

## OVERVIEW

### Important Dates:

- Government wide implementation date required in NSPM-33 was August 8, 2024.

### Requirements:

Section 10632 of the CHIPS and Science Act of 2022 (42 U.S.C. § 19232) contains both an individual certification requirement (individuals designated as senior/key persons on a proposal) and an organizational certification regarding malign foreign talent recruitment programs (MFTRP).

NSF was the first agency implementing this requirement, effective for all proposals submitted on or after May 20, 2024. For NSF proposals, certification is included on the Biographical Sketch and the Current and Pending (Other) Support documents. These require the individual to certify that the individual is not a party to a MFTRP (see NSF PAPPG Chapters I.E.2.(b) and II.D.1.e for additional information) prior to proposal submission. NSF also requires all senior/key personnel on potential awards to submit updated Current and Pending (Other) Support information prior to making a funding recommendation. These requests are being emailed to the PI during the Just-In-Time (JIT) period, and includes a short turn-around due date. While not all Federal agencies have issued guidance or adopted the Common Forms for Biosketch and Current and pending, the NSPM-33 deadline to implement certification requirements was August 8, 2024. Therefore, Mason is implementing a process to review all Federal Funding Opportunities for this requirement and conduct MFTRP security reviews for federal proposals. This will ensure Mason is in compliance with Federal law and guidance.

### Mason Implementation

The MFTRP reviews and certifications will impact **ALL** of Mason's federal proposals. Information has been developed and shared with faculty and will be reissued.

Additionally, ORIA has developed a process to meet the organizational due diligence requirements to verify that individuals are not party to a malign foreign talent recruitment program. With each Federal application submission, we must provide AOR certification that all individuals identified as senior/key personnel have been made aware of and have complied with their responsibility to certify that they are not a party to a MFTRP.

ORIA personnel will be monitoring PI activity and reviewing Biosketch and Current and Pending disclosures. They will look at the disclosures as well other relevant sources and cross check information. Therefore, all federal proposals, regardless of whether they are required, must submit to OSP the complete Common Form Biosketch or Current and Pending with signed certification. OSP will submit these to ORIA for the MFTRP review, following the below process.

## Business Process: MFTRP Security Check

### Stage: Prior to Department Review

#### Local Research Administrator (Administrative Contact)

1. Review all federal Funding Opportunities, including pass-through opportunities, to check if MFTRP certifications have been added.
  - All NSF proposals require use of Common Forms including MFTRP certification
  - For NASA proposals see NASA Addendum below.
  - OSP maintains a database of agency language, [see Matrix](#) and advise OSP of any needed updates
  - Review table of contents and opportunities for references to: Research Security, foreign influence, malign foreign talent, sponsored foreign talent, foreign recruitment, sponsored foreign government, National Defense authorization act, etc.
  - If there are agency specific certification documents required, , and please ensure PI completes and those are uploaded to RAMP along with a comment indicating there is an agency specific form or certification, not just the Common Form.
  - If there are no agency specific forms, please use the OSTP Common Forms (insert hyperlink) for Biosketch and Current and Pending and follow process in Step 2 below.
2. If using ScienCV to produce Current and Pending (C&Ps), proceed to Step 4. Otherwise, continue to step 3.
  - Ensure all C&Ps submitted by subrecipients and other key personnel meet the Common Form template outlined here:  
[https://www.nsf.gov/bfa/dias/policy/researchprotection/commonform\\_cps.pdf](https://www.nsf.gov/bfa/dias/policy/researchprotection/commonform_cps.pdf)
3. Use RAMP to generate Other Support for Mason personnel [here](#) and revise it to align with the Common Form linked above. OSP has created an editable template linked on the Current and Pending section of its website as a job aid.
  - **NOTE:** Sections marked in **green** on the Common Form Template are additions that must be made to the C&P that downloads from RAMP to ease the editing process.
  - Make sure to convert all text color to black.
4. Ensure all C&Ps are signed.
5. Combine 1) Biosketches and 2) Current and Pending into a single document entitled MFTRP. Upload to FP>Attachments.

- Biosketches for all senior/key personnel on the proposal (PIs, Co-PIs, faculty, subrecipient key personnel). Consultants only if they are listed as key personnel.

Budgets	SF424 Summary	History	Reviewers	Attachments
<b>Name</b>				
Full Proposal FP3210 Luke NSF.pdf				
Indirect Split FP3210 Luke NSF.xlsx				
Luke Biosketch				
Mathematical Biology _ NSF - Solicitation.pdf				
<b>MFTRP FP3210 Luke NSF.pdf</b>				
NSF Checklist FP3210.pdf				
SOW FP3210 Luke NSF.pdf				

6. Initiate the “MFTRP Security Check” ancillary review and assign to Organization>Research Integrity.

**Add Ancillary Review**

1. \* Select either an organization or a person as reviewer:

Organization: Research Integrity [dropdown] [add icon]

Person: [input field] [dropdown]

2. \* Review type:

NSF MFTRP Security Check [dropdown]

3. \* Response required?

Yes  No [Clear](#)

4. Comments:

[text area]

- **You do not have to wait for ORIA approval to complete Departmental Review and move to OSP Specialist Review.**
- Notes: If key personnel are listed anywhere in a proposal, including subrecipients and consultants, ORIA will need to screen them.
- If ORIA has not cleared a proposal by 2-days before deadline, please message them at [ramp.coi@gmu.edu](mailto:ramp.coi@gmu.edu)
- AOR will not sign certification forms until ORIA has cleared proposal.

7. Prepare any additional documents per the RFP, agency guidance, or other sponsor instructions:
  - If George Mason is the subrecipient, the MFTRP Security Check is still required. If our pass-thru sponsor has a form required, depending on the wording, it may be that both the PI and AOR sign. Please share forms with Maggie Ewell, OSP Pre-Award Director, for guidance. If the form is just the organization certification, similar to above, only OSP Pre-Award Director would sign, following completion of COI review.
  - For subrecipients:
    - Ensure C&Ps meet the common form template (see Step 3 above).
    - Please ask subs to include in cover letter the organizational certification:

*In accordance with Section 10632 of the CHIPS and Science Act of 2022 (42 U.S.C. § 19232), I certify that all individuals identified as senior/key personnel have been made aware of and have complied with their responsibility under that section to certify that the individual is not a party to a malign foreign talent recruitment program.*

- For LOIs, if they are required to come through OSP, per the Mason policy, then they will complete a MFTRP review. LOIs submitted by PI, with no OSP involvement, do not require MFTRP review until they are invited to submit full proposal.

## Stage: Specialist Review

### OSP Specialist

1. Ensure the MFTRP Security Check is complete. It should state 'Yes' under 'Accepted':

**Manage Ancillary Reviews**

1. Identify each organization or person who should provide additional review.

Review Type	Org	Person	Reqd	Accepted	Notified	Comments
MFTRP Security Check	Research Integrity		yes	yes	yes	

2. You do not have to wait for ORIA approval to complete Specialist Review. For NASA proposals see NASA Addendum below.
3. Upon completing review, assign OSP AOR Review ancillary. Please remember:
  - a. AOR will hold approvals and signatures until ORIA approves the ancillary
  - b. If ORIA review results in required edits to Biosketches or C&Ps, OSP Specialist will work with Department RA to complete
  - c. If the proposal is ready, but awaiting ORIA approval two days prior to the Sponsor deadline, email [rampcoi@gmu.edu](mailto:rampcoi@gmu.edu)