

Frequently asked questions on NASA China PI and team member certification for grant proposals and award

1. QUESTION: Will answering “Yes” on any of the certification questions preclude me from submitting a proposal?

ANSWER: A “yes” answer will not automatically preclude proposal submission, but it will be discussed between the PI, unit administration, OSP, University leadership, and George Mason counsel, if necessary. The PI will be advised on whether to include information in the proposal or to NASA pre-award.

2. UPDATED 2/28/25: QUESTION: Question No. 2 of the current NASA China Certification, which all NASA PIs are required to answer, contains this question: *“Do you have any active collaborations or other work-related relationships (paid or unpaid) with individuals who are employed by or acting on behalf of China, a Chinese-owned company, or any Chinese research institute, university, or government unit?”*

Could you define “collaborations or other work-related relationships?” For example, which of the following is considered relevant and requires a report: funding proposals, journal reviews, organizing conferences/workshops, serving/volunteering on national and international professional organizations with members from China, book writing, paper writing, email exchanges on research discussion, answering public data/model questions?

ANSWER: NASA is broadly interested in knowing about collaborative activity between researchers on NASA grants and persons affiliated with China, Chinese institutions, or Chinese businesses. Many such relationships are permissible under NASA’s China-funding restrictions, but should be disclosed to the Office of Sponsored Programs (OSP) so that it can review whether they comply with those funding restrictions, and whether and how they should be disclosed to NASA. OSP will consult with university leadership to assess whether the collaborations and other work-related relationships comply with funding restrictions and make further determinations prior to submitting proposals to NASA. To facilitate University leadership’s decision-making process, PIs and team members should take a broad and inclusive disclosure approach.

For the purposes of this Question, you should consider if the activity involves an affiliation or collaboration with persons associated with the Chinese government, including universities and business entities. If so, it should be disclosed.

Any funding proposal, or current book writing, research, or preparation of journal articles or other writings with persons affiliated with China should be disclosed, even if unrelated to a proposed or existing NASA-funded project.

Any service on an editorial board of a publication based in or affiliated with China should be disclosed. Reviewing manuscripts with Chinese authors for a journal would not need to be disclosed.

Activities involving attendance at, or organization of, multinational conferences and workshops do not need to be disclosed simply because persons affiliated with China are participating. Similarly, there is no general duty to disclose work in international professional organizations that have members from China.

You are not required to disclose general scientific discussions with persons in China on public data/model issues.

You are not required to disclose the use of data from China that is publicly available. However, you must do so if information is provided by China pursuant to an agreement for access to data.

3. QUESTION: Why is “unpaid” work required to report by GMU?

ANSWER: Collaborations can happen in paid or unpaid work. Nothing about the NASA China-funding restrictions is limited to paid work. The Government specifically requires reporting to include unpaid work and roles.

4. QUESTION: For PI Question No. 2, can you define “individuals who are employed by or acting on behalf of China, a Chinese-owned company, or any Chinese research institute, university, or government unit”? The difficulty for PIs is how to determine if a collaborator is “acting on behalf of China”? Do we need to ask all collaborators if they are employed by China or “acting on behalf of China” before engaging any collaborations?

ANSWER: You do need to ask proposed collaborators on a NASA-funded project if they are employed (full, part-time, or in any other paid or unpaid roles) by or affiliated with the government of China, a Chinese university, or a Chinese business.

5. QUESTION: The certification form for Individual Information Question No. 1 contains the note “This may include such funding that you are personally aware of to a research center, institute, or group that you belong to as a member.” I am concerned about the word “group.” Specifically, does this mean that I need to attest that neither I nor *anyone in PIs group* receives funding or support from China or a Chinese research unit? In other words, it may be insufficient to attest that I *personally* do not receive funding, but rather I have to attest neither I nor ***anyone in any group in which I work*** receives funding from China, which requires me to ask everyone in the group about their funding situation.

ANSWER: The certification in Individual Information Question No. 1 is asking whether you, personally receive funding or other support from China either as a direct funding recipient as well as anything funded under the auspices of a George Mason center, institute, or other group. You do not need to certify on behalf of or about all members of a group in which you are a member.

6. NEW 2/28/25 QUESTION: *Related to the question: Do you have **any** active collaborations or **other work-related relationships (paid or unpaid)** with individuals, including planned co-*

authors, who are employed by or acting on behalf of China, a Chinese-owned company, or any Chinese research institute, university, or government unit?” Researchers are required to report both “bilateral” and “multilateral” collaborations even though multilateral collaborations are permitted. While multilateral collaborations are permitted according to Federal laws and NASA Guidance, [Section 1340 of Public Law 112-10](#) (Appendix A) and [Section 539 of Public Law 112-55](#) (Appendix B) explicitly state that “None of the funds made available by this Act may be used for the National Aeronautics and Space Administration (NASA) or the Office of Science and Technology Policy (OSTP) to develop, design, plan, promulgate, implement, or execute a **bilateral** policy, program, order, or contract of any kind to participate, collaborate, or coordinate **bilaterally** in any way with China or any Chinese-owned company unless such activities are specifically authorized by a law enacted after the date of enactment of this division.” The NASA PRC guidance for NASA proposers (Appendix C) states that “A5: Work that involves investigators affiliated with institutions in other countries in addition to the PRC and USA, and/or work done under the auspices of a multilateral organization is generally permitted.”

ANSWER: While bilateral collaborations are prohibited, and multilateral collaborations are “generally permitted,” NASA has advised Mason that such multilateral collaborations must be *disclosed* to NASA for their knowledge. This is clearly conveyed on the NASA Pre- and Post-Award Disclosure matrix #4 which states that in current and pending support, you must disclose: (a) all resources made available, or expected to be made available, to an individual in support of the individual’s research and development efforts, regardless of (i) whether the source is foreign or domestic; (ii) whether the resource is made available through the entity applying for a research and development award or directly to the individual; or (iii) whether the resource has monetary value; and (b) includes in-kind contributions requiring a commitment of time and directly supporting the individual’s research and development efforts, such as the provision of office or laboratory space, equipment, supplies, employees, or students.

Additionally, NASA requires individual and organizational certifications regarding participation in Malign Foreign Talent Recruitment programs. Your disclosure of information regarding multilateral collaborations is essential for Mason to review and provide accurate organizational certification regarding Malign Foreign Talent Recruitment programs required under NSPM-33.

NASA has also clarified that travel supported/paid by an external entity solely to attend a conference or workshop is not required to be disclosed to NASA. Therefore, Mason will no longer require that travel to conferences supported/paid by an external entity be disclosed on the current and pending form. The information should still be listed on the travel question of the Mason NASA certification to ensure that nothing about the travel falls under the NASA disclosure requirements.

7. Can you clarify the phrase “*any ... other work-related relationships (paid or unpaid).*” For example, does it include serving in the same editorial boards, membership in the same professional organizations, or international expert panels? What constitutes a relationship? Instead of using “any other relationship”, the forms need to provide a list of specific activities.

ANSWER: It is not possible to provide a list of specific activities. Please see Question and Answer #2 above which provides additional detail and examples of the types of activities to include and not to include.

Please note, Mason regularly participates in Research Security training and seminars with Federal agencies and as recently as January, 2025, Federal Agencies stated in public forums, such as the Federal Demonstration Partnership (FDP) conference, that collaborations such as co-authorships, are valuable information for their agencies as they review grants to determine potential research security risks, such as Malign Foreign Talent Recruitment programs. Therefore, Mason will retain the question and continue to ask PIs and key personnel for NASA proposals and awards *to report any active collaborations or other work-related relationships (paid or unpaid) with individuals, including planned co-authors, who are employed by or acting on behalf of China, a Chinese-owned company, or any Chinese research institute, university, or government unit.* Mason will evaluate whether these meet the criteria set forth in the NASA disclosure matrix for reporting purposes.