



Office of the Chief of Research Security Strategy and Policy: Research Security Policy Updates

External EPSCoR Workshop

Sarah Stalker-Lehoux

Deputy Chief of Research Security Strategy and Policy

National Science Foundation

June 18, 2024

Research Security Training Modules



Research Security Training for the U.S. Research Community

- Four teams developing research security training frameworks and training modules
- Co-funded with National Institutes of Health (NIH), Department of Energy (DOE), and Department of Defense (DOD)
- Available for all appropriate researchers, stakeholders, students, academics, research security experts and leaders, government agencies and national laboratories



CHIPS+: Research Security Training Modules

1

What is
Research
Security?



2

Disclosure



3

Manage and
Mitigate Risk



4

International
Collaboration



The modules are now available on the NSF website

<https://rst.nsf.gov>

<https://new.nsf.gov/research-security/training>

Multiple options for accessing modules:

Take the research security training

Take the training directly from your browser. Visit the four training modules at the links below.

- Each module should take about 60 minutes to complete.
- You can leave a module and return without losing progress from this browser.
- When you complete the module, you can download or print a completion certificate, but the module **will not save a record** of your training.



› Module 1: What is Research Security?

Learn key concepts of research security and how to recognize situations that may indicate undue foreign influence. Understand the regulatory landscape that shapes research security and discover what you can do to safeguard the core values that underpin U.S. academic research.

[Start module 1](#)



› Module 2: Disclosure

Learn about federal funding agency disclosure requirements, including types of information that must be disclosed, how that information is used, and why such disclosures are fundamental to safeguarding the U.S. research enterprise from foreign government interference and exploitation.

[Start module 2](#)

Web-based versions that can be taken online

Deploy your own instance of the training

If you would like to download these modules for your organization to use, you have two options:

1. **LMS/SCORM:** Download the LMS/SCORM file for use in your organization's learning management system. The files are compiled as SCORM 1.2.
2. **Storyline Source File:** Most of our online lessons are built in Articulate 360. Download the .story file if you would like to edit or modify the lessons in Storyline.

Title	Source files
Module 1: What is Research Security?	1. LMS/SCORM 2. Storyline Source File
Module 2: Disclosure	1. LMS/SCORM 2. Storyline Source File
Module 3: Manage and Mitigate Risk	1. LMS/SCORM 2. Storyline Source File
Module 4: International Collaboration	1. LMS/SCORM 2. Storyline Source File

IHEs can download for integration into learning management systems

Questions? Check out the recently released FAQs!



SECURE

Safeguarding the Entire Community in
the U.S. Research Ecosystem



Today's Geopolitical Environment is Challenging for Research



Researchers & Institutions



SECURE is the bridge



US Government





Mission:

Empower the research community to make security-informed decisions about research security concerns



Approach:

Providing information, developing tools, and providing services



Audience:

IHEs, non-profit research institutions, and small and medium-sized businesses



Duties of SECURE under CHIPS

- 1** **Serve as a clearinghouse for information** to help enable the members and other entities in the research community to understand the context of their research and identify improper or illegal efforts by foreign entities to obtain research results, know how, materials, and intellectual property;
- 2** **Develop a standard set of frameworks and best practices**, relevant to the research community, to assess research security risks in different contexts;
- 3** **Share information concerning security threats** and lessons learned from protection and response efforts through forums and other forms of communication;
- 4** **Provide timely reports** on research security risks to provide situational awareness tailored to the research and STEM education community;
- 5** **Provide training and support**, including through webinars, for relevant faculty and staff employed by institutions of higher education on topics relevant to research security risks and response;
- 6** **Enable standardized information gathering** and data compilation, storage, and analysis for compiled incident reports;
- 7** **Support analysis of patterns of risk and identification** of bad actors and enhance the ability of members to prevent and respond to research security risks;



What SECURE will do... and won't do



Uniform Quality of Service



Reduce Cost and Administrative Burden



Frameworks and Best Practices



Advice, Decisions, Investigations, Policy



Curated Syntheses

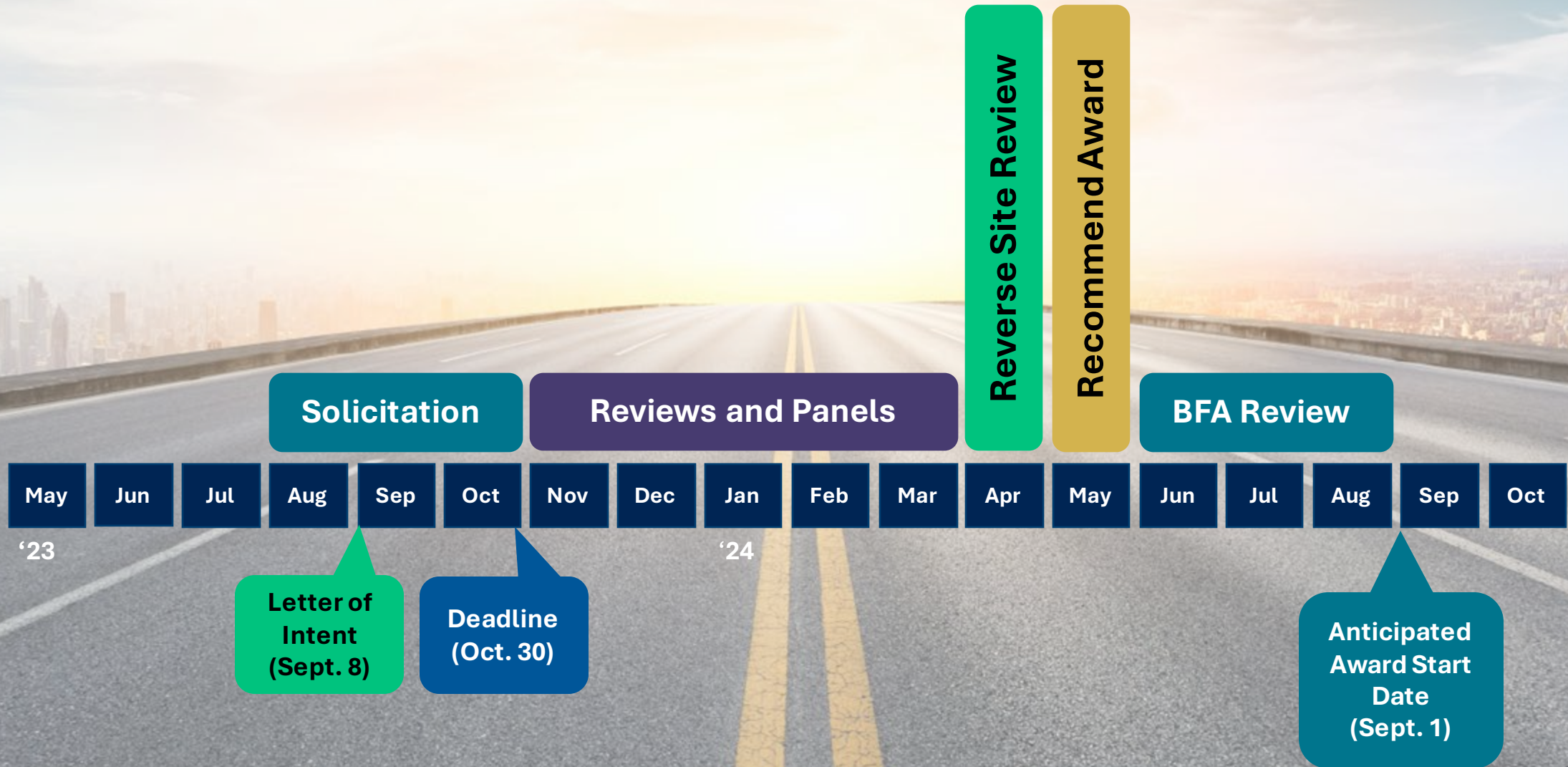


Patterns of Risk



Analytical Tools

SECURE Center Timeline





TRUST
TrusteR** **Research Using Safeguards and
Transparency****

Our Guiding Principles



Respect the science



Get to “YES”



Focus on mitigation measures

Practicing Thoughtful Vigilance...

TRUST

Avoid curtailing beneficial activities due to risk aversion or overly broad interpretation of policy.

Avoid the targeting of individuals based on nationality or country of origin. Protect core values of fairness and due process throughout.

Maintain open lines of communication with the community. We want to hear from you before situations become a major concern.



NSF Responding to Legislative Requirements

Section 10339 of the CHIPS and Science Act

Identify *research areas* ... that may involve access to “**controlled unclassified or classified information**” and “exercise due diligence in granting access to individuals working on such research who are employees of the Foundation or covered individuals on research and development awards funded by the Foundation.”

FY23 Appropriations Report

Open-source research capabilities at NSF could be used by adversaries against U.S. allies or U.S. interests...therefore directs the NSF to collaborate with the Secretary of Defense and the Director of National Intelligence to compile and maintain a list of all NSF-funded open-source research capabilities that are known or suspected to have an impact on foreign military operations.



How did we develop our process?

**February
2024**

JASON Sensitive Research Study

- Assess national security application of the research at the project level

**March
2024**

JASON Rubric Road Test

- NSF proposals lack information for certain evaluation criteria
- Suggestion to use a decision tree rather than a rubric

**March
2024**

NSF Internal Consultations – RSLG, QSSC Road Test

- Development of QIST keywords to use during pilot phase
- Understanding of resources required for Research Security Review Team

**April
2024**

Interagency Consultations – DARPA, NIST, R&E

- Identify mitigation strategy with the research institution
- Benchmarked process and mitigation strategies



External Engagement

Academia

- Association of American Universities
- American Council on Education
- Association of Public and Land-Grant Universities
- Council on Governmental Relations
- Federal Demonstration Partnership (FDP) Research Security Subcommittee and May Meeting
- FDP Future Listening Sessions*
- HBCU Science Council*

Professional Societies

- American Physical Society
- Institute of Electrical and Electronics Engineers*
- Association for Computing Machinery*
- American Society of Mechanical Engineers*
- Asian American Scholars Forum

Small Businesses

- Small businesses and FFRDCs at the Chicago Quantum Symposium
- Small Business Technology Council*

* Indicates planned or upcoming meeting



TRUST: "Trusted Research Using Safeguards and Transparency"

Evaluate Three Criteria, with transparent step by step process:

- 1) Appointments and positions with, and research support from U.S. proscribed parties and whether a party to a malign foreign government talent recruitment program (MFTRP)
 - U.S. Bureau of Industry and Security Entity List
 - Annex of Executive Order (EO) 14032 or superseding EOs
 - Sec. 1260H of the National Defense Authorization Act (NDAA) for FY2021 - Sec. 1286 of the NDAA for FY2019, as amended
- 2) Nondisclosures of appointments, activities and sources of financial support (current research security policy)
- 3) Potential foreseeable national security applications of the research

OCRSSP will confirm that senior personnel have no ***active appointments and positions with or receive research support from U.S. proscribed parties***, and that they are not a **party to a MFTRP**

Undisclosed information will be examined from the time NSPM-33 Implementation Plan was released (Jan 2022)



TRUST Process

Appointments and positions w/
and research support from U.S.
Proscribed Parties and MFTRPs



OCRSSP conduct analytics



Research Security Review Team
to identify mitigation



OCRSSP and the institution will
work together to mitigate risk

Nondisclosures (Current
Research Security Policy)



OCRSSP conduct analytics



Research Security Review Team
to identify mitigation



OCRSSP and the institution will
work together to mitigate risk

National Security Application of
the Research



OCRSSP Keyword Automated
Review



Research Security Review Team
to identify mitigation



External USG consultation
coordinated through ODNI (if
needed)



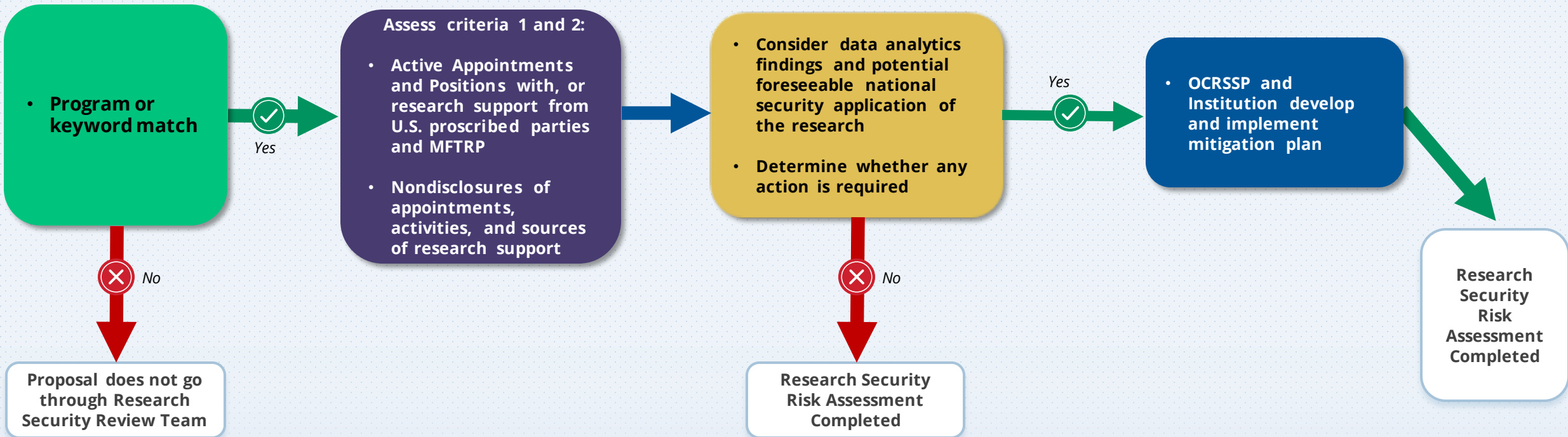
TRUST Process

NSF CONSIDERS AWARD RECOMMENDATION

OCRSSP DATA ANALYSTS

RESEARCH SECURITY REVIEW TEAM

RESEARCH INSTITUTION



Research Security Review Team Questions

Are the national security aspects important enough to override the societal benefits of non-national security applications?

Is the technology sufficient and unique enough for the national security use case in mind?

What are the goals of the project?

Guiding Questions



Do certain mitigation measures on the project confer a meaningful advantage to the United States?



Research Security Review Questions continued...

What happens if we say no?

- If the United States has a **definitive advantage**, mitigation makes the most sense when and so can endure the burden of additional protections without negatively impacting the country's relative position.
- If “**neck and neck**,” consider whether imposing the burden of security restrictions on U.S. researchers might slow the pace of U.S. innovation relative to foreign competitors.
- If the United States is **not the leader** in this domain, consider whether the United States seeks to benefit from this international cooperation by elevating U.S. capabilities, despite the potential level of risk.



Mitigation Strategies – Examples from DARPA

- NSF is considering some of DARPA's potential risk mitigation strategies that have proven effective when preparing risk mitigation strategies for Countering Foreign Influence Policy issues.
- NSF intends to work with the Federal Demonstration Partnership on sharing mitigation strategy templates
 - 1) Periodic Security Communication
 - 2) Expanded Reporting Requirements
 - 3) Certification of Status
 - 4) Confirmation of Disassociation
 - 5) Proactive Security Measures at Institutions



Example mitigation plan excerpt from DARPA:

- A researcher was rated as a VERY HIGH risk due to multiple active affiliations with PRC government-connected entities (Factor 4 of the DARPA risk rubric) and several instances of active funding from the same entities.
- The Program Manager wanted to mitigate those risks and requested that the institution implement expanded reporting requirements as one part of a multi-faceted mitigation plan.

“The researcher will meet with the institution’s Office of Scientific Integrity on a quarterly basis to review a list of his active collaborations to determine whether there are any changes that should be reported to funding agencies or any additional management/oversight to put in place (e.g., a new COI management plan or modifications to existing plans).”

“On a quarterly basis the institutions will send either an updated list of the researcher’s collaborations or a certified notification that there is no change from the previous submission. These reports will be sent quarterly based on the initial award date of the project.”

“The institution will require the researcher to request permission before engaging in any new foreign collaborations. These collaborations will be vetted by the institution’s Office of Scientific Integrity to determine whether the researcher can begin a collaboration or whether additional mitigation measures need to be implemented.”

“During the six-month reporting period, the researcher will be required to submit an updated SF-424. The SF-424 does have an overall page limitation, which prevented the researcher from including all of his information previously. Going forward, additional pages will be included for any required information that does not fit within the page limit.”



TRUST Implementation

External webinars: June 11, June 20 [Register Here](#)

Email address: trust@nsf.gov

- **Phase 1 – Quantum Proposals – beginning FY25**
 - Pilot program will be an *iterative process* and NSF will assess:
 - Implementation of new Tiger Team process
 - Timeline of process, bandwidth and resources required from NSF staff
 - NSF's ability to assess potential national security application of the research
 - How often NSF needs external consultation
 - ***Continued External Engagement – Listening Sessions with FDP Members, among others***
- **Phase 2 – PAPPG Changes & Expand to some CHIPS+ Key Tech Areas**
 - Information to assess certain criteria are not currently in solicitations
 - Consider expansion to Microelectronics, AI, and Biotechnology.
- **Phase 3 – Scale up Review for all CHIPS+ Key Tech Areas**
 - NSF Staff will have more familiarity with the process
 - Mitigations will be more streamlined, expediting the review process





Contact Information:

- Sarah Stalker-Lehoux, Deputy CRSSP: [sstalker@nsf.gov](mailto:ssstalker@nsf.gov)
- OCRSSP Main Email: research-protection@nsf.gov
- OCRSSP Email for new TRUST policy: trust@nsf.gov
- NSF Research Security Website: <https://new.nsf.gov/research-security>





NSF Proposal and Award Policy Update

ENG EPSCoR PI Meeting

June 18, 2024

Speakers

Jean Feldman, Head, Policy Office

Division of Institution and Award Support

Office of Budget, Finance and Award Management

policy@nsf.gov

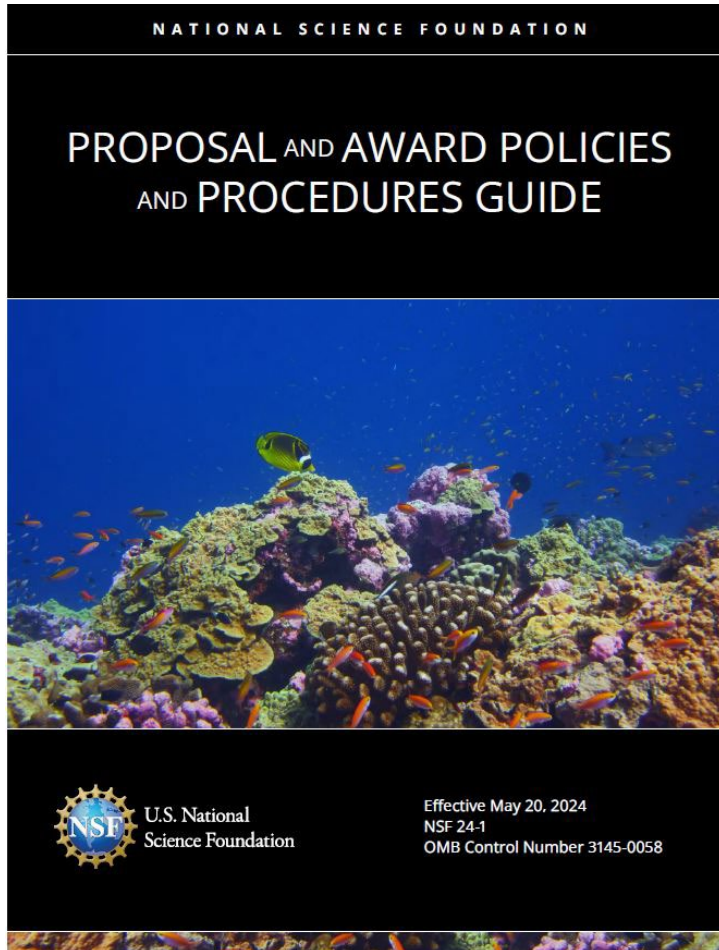


Topics

- Proposal & Award Policies & Procedures Guide (PAPPG) (NSF 24-1)
 - Effective Date
 - Summary of Significant/Relevant Changes to EPSCoR PIs
- Outreach Opportunities
- Additional Resources



NSF PAPPG (NSF 24-1)



Effective for proposals submitted or due on or after May 20, 2024

Summary of Changes to the PAPPG (NSF 24-1)

[Home](#) [Proposal & Award Policies & Procedures Guide \(PAPPG\) \(NSF 24-1\)](#)

[PAPPG - printable version \(PDF\)](#)

[Summary of Changes to the PAPPG](#)

[Table of Contents](#)

[Introduction](#) +

[Part I: Proposal Preparation and Submission Guidelines](#) +

[Part II: Award, Administration and Monitoring of NSF Assistance Awards](#) +

[Subject Index](#)

[Privacy Act and Public Burden Statements](#)

Effective Date May 20, 2024

Overall Document

- Editorial changes have been made throughout to either clarify or enhance the intended meaning of a sentence or section.
- Website and document references have been updated to reflect current information.
- Updates have been made to ensure consistency with data contained in NSF systems or guidance located and terminology used in other NSF or Federal policy documents.

By-Chapter Changes

Chapter I: Pre-Submission Information

- **Chapter I.D, Concept Outlines**, has been updated to provide additional clarity on the use of concept outlines and the Program Suitability and Proposal Concept Tool (ProSPCT).
- **Chapter I.D, Types of Submissions**, includes new coverage on the use of concept outlines and the required use of the Program Suitability and Proposal Concept Tool (ProSPCT) for submission. Additional changes on the use of concept outlines and the use of ProSPCT for specific proposal types is available in Chapter II.E.
- **Chapter I.E, Who May Submit Proposals:**



PAPPG (NSF 24-1)

Summary of Changes

- Malign Foreign Talent Recruitment Programs (MFTRP)
 - Any individual who is a current party to a MFTRP is ineligible to serve as a senior/key person on an NSF proposal or award.
 - This requirement applies to any proposal submitted or due on or after May 20, 2024
 - Definition of MFTRP is contained in the PAPPG Introduction, Section D.
 - Each senior/key person must certify prior to proposal submission that they are not a party to a MFTRP (Biographical Sketch and Current and Pending (Other) Support).
 - Each PI and co-PI on any NSF award must certify annually thereafter.
 - A new term and condition has been added implementing this requirement post-award.
 - Organizations must certify upon proposal submission that all senior/key personnel have been made aware of and complied with the requirement that they are not a party to a MFTRP.



PAPPG (NSF 24-1)

Summary of Changes

- Postaward Foreign Financial Disclosure Report (FFDR) requirements (applies to each IHE that receives an award or funding amendment on an existing award made on or after May 20, 2024)
 - Each IHE must submit an institutional report annually – negative reports are required
 - Reporting includes any gift or contract with a cumulative value of \$50K or more from a country of concern
 - Reports must be submitted by July 31 each calendar year in Research.gov
 - IHEs must maintain copies of relevant records
 - NSF may request copies of contracts, agreements, or documentation of financial transactions associated with disclosures.
 - Organizations other than IHEs are not required to submit annual FFDR reports
 - A new term and condition has been added implementing this requirement post-award.



PAPPG (NSF 24-1)

Summary of Changes

- Mentoring plan requirement expanded to include graduate students
 - Funding for graduate students and/or postdoctoral scholars must include a mentoring plan not to exceed one page.
 - There are not separate plans for graduate students and postdoctoral scholars.
 - A single plan must be included for all graduate students or postdoctoral researchers supported by the project regardless of whether they reside at the submitting organization, any subrecipient organization, or at any organization participating in a simultaneously submitted collaborative proposal.



PAPPG (NSF 24-1)

Summary of Changes

- Individual development plan requirement for graduate students and postdoctoral researchers
 - Graduate students and postdoctoral researchers with substantial support must have an individual development plan (updated annually), which maps to educational goals, career exploration, and professional development.
 - NSF defines substantial support as an individual who has received one person month or more of support during the annual reporting period.
 - Certification that each graduate student or postdoctoral scholar has a plan is completed by the PI or co-PI in Research.gov as part of the annual reporting process.
 - A new term and condition has been added implementing this requirement post-award.



Common Forms for the Biographical Sketch and Current and Pending (Other) Support

- Revision of the Biographical Sketch and Current and Pending (Other) Support
 - NSF and NIH co-chaired the NSTC disclosure policies working group to develop Common Forms for the Biographical Sketch and Current and Pending (Other) Support
 - Common Forms harmonize content requirements for both forms for use by Federal Research Funding Agencies
 - The comments reflect input from both research funding agencies and the research community
 - Both forms include the requisite certification from NDAA 2021, Section 223 regarding information being accurate, current and complete and that the individual is not a party to a MFTRP
 - PAPPG (NSF 24-1) contains NSF's implementation of both Common Forms.



PAPPG (NSF 24-1) Common Forms

- Common Forms Implementation Guidance – Disclosure Requirements and Standardization
- NSF serves as steward of the Common Forms

NSTC Research Security Subcommittee NSPM-33 Implementation Guidance Disclosure Requirements & Standardization

Over the past several months, the National Science and Technology Council (NSTC) Research Security Subcommittee has worked to develop consistent disclosure requirements for use by senior personnel, as well as to develop proposed common disclosure forms for the Biographical Sketch and Current and Pending (Other) Support sections of an application for Federal research and development (R&D) grants or cooperative agreements.

The National Science Foundation (NSF) has agreed to serve as steward for these common forms as well as for posting and maintenance of the table entitled, *NSPM-33 Implementation Guidance Pre- and Post-award Disclosures Relating to the Biographical Sketch and Current and Pending (Other) Support*.

The objective of the *Disclosure Requirements and Standardization* section of NSPM-33 Implementation Guidance is to, "Provide clarity regarding disclosure requirements (e.g., who discloses what, relevant limitations and exclusions), disclosure process (e.g., updates, corrections, certification, and provision of supporting documentation), and expected degree of cross-agency uniformity".

COMMON DISCLOSURE FORMS FOR THE BIOGRAPHICAL SKETCH AND CURRENT AND PENDING (OTHER) SUPPORT

- **New!** Common Form for Biographical Sketch
- **New!** Common Form for Current and Pending (Other) Support Information
- **New!** Definitions

Guidance for Federal research funding agencies on obtaining approval from OMB/OIRA to use the Common Disclosure Forms may be obtained from your agency's Paperwork Reduction Act (PRA) Officer. For assistance in identifying your PRA officer, please contact Suzanne Plimpton at splimpto@nsf.gov.

DISCLOSURE REQUIREMENTS



Major Changes Made to the Common Forms to Incorporate Community Feedback

- Biographical Sketch
 - Definitions added for Institutional, Professional, and Academic Positions and Appointments (included in updated Definitions document).
 - Certification language modified to address concerns, however, it is incumbent on each Federal Research Funding Agency to issue provide detailed instructions on the certification requirements that apply specifically to that agency. Language also added that specifies that the signature must be in the same calendar year of the proposal being submitted.
 - New certification added on Malign Foreign Talent Recruitment Programs (both of these changes also apply to Current and Pending (Other) Support.
 - Parameters have been added regarding professional appointments: “With regard to professional appointments, senior/key persons must only identify all current domestic and foreign professional appointments outside of their primary organization.”
 - Guidance revised regarding listing of products: “The listing of products provided should be organized by the senior/key person in a way that best demonstrates their ability to carry out the research proposed. It is incumbent on each Federal Research Funding Agency to issue guidance regarding any specific limitations to the number of products permitted.”



Major Changes Made to the Common Forms to Incorporate Community Feedback

- Current and Pending (Other) Support

- Revised definition of In-kind contribution provided: "In this section, please disclose all in-kind contributions with an estimated dollar value of \$5000 or more and that require a commitment of the individual's time. An in-kind contribution is a non-cash contribution provided by an external entity that directly supports the individuals' research and development efforts. An in-kind contribution may include but is not limited to: real property; laboratory space; equipment; data or data sets; supplies; other expendable property; goods and services; employees or student resources. In-kind contributions with an estimated value of less than \$5000 need not be reported." It is not possible, however, to develop a one size fits all definition of In-kind contributions given the variance in agency missions.
- Clarified definition of consulting to provide greater clarity on what must be reported:
 - "Consulting activities must be disclosed under the Proposals and Active Projects Section of the form when any of the following scenarios apply:
 - The consulting activity will require the senior/key person to perform research as part of the consulting activity;
 - The consulting activity does not involve performing research, but is related to the senior/key person's research portfolio and may have the ability to impact funding, alter time or effort commitments, or otherwise impact scientific integrity; and
 - The consulting entity has provided a contract that requires the senior/key person to conceal or withhold confidential financial or other ties between the senior/key person and the entity, irrespective of the duration of the engagement."



PAPPG (NSF 24-1) Biographical Sketch

- Required for each individual identified as a senior/key person.
 - Used to assess how well qualified the individual, team, or organization is to conduct the proposed activities.
 - Individuals are required to disclose contracts associated with participation in programs sponsored by foreign governments, instrumentalities, or entities, including foreign government-sponsored talent recruitment programs.
 - Must certify that they are not a party to a MFTRP
- Must be created in SciENCv.



BIOGRAPHICAL SKETCH COMMON FORM November 1, 2023

This Biographical Sketch Common Form provides instructions for submission of a biographical sketch by each individual identified as a [senior/key person](#) on a Federally funded research project. The biographical sketch is used to assess how well qualified the individual, team, or organization is to conduct the proposed activities.

Consistent with NSPM-33, individuals are required to disclose contracts associated with participation in programs sponsored by foreign governments, instrumentalities, or entities, including [foreign government-sponsored talent recruitment programs](#). Further, if individuals receive direct or indirect support that is funded by a foreign government-sponsored talent recruitment program, even where the support is provided through an intermediary and does not require membership in the foreign government-sponsored talent recruitment program, that support must be disclosed. Individuals must also report other foreign government sponsored or affiliated activities. In accordance with 42 USC § 19232, individuals are prohibited from being a party in a [malign foreign talent recruitment program](#).

A table entitled, *NSPM-33 Implementation Guidance Pre- and Post-award Disclosures Relating to the Biographical Sketch and Current and Pending (Other) Support*² has been created to provide helpful reference information regarding pre-award and post-award disclosures. The table includes the types of activities to be reported, where such activities must be reported in the application, as well as when updates are required in the application and award lifecycle. A final column identifies activities that are not required to be reported.

Individuals are reminded **not to submit any personal information in the biographical sketch**. This includes items such as: home address; home telephone, fax, or cell phone numbers; home e-mail address; driver's license number; marital status; personal hobbies; and the like. Such personal information is not appropriate for the biographical sketch and is not relevant to the merits of the proposal. The Federal research funding agency is not responsible or in any way liable for the release of such material.

The format of the Biographical Sketch Common Form is provided below. There is no page or character limit to this section of the application.

*** = required**

***Identifying Information**

***Name:** Enter the name of the senior/key person (Last Name, First Name, and Middle Name, including any applicable suffix).

Persistent Identifier (PID) of the Senior/Key Person: Enter the PID of the senior/key person. The PID is a unique, open digital identifier that distinguishes the individual from every other researcher with the same or a similar name.

***Position Title:** Enter the current position title of the senior/key person.

PAPPG (NSF 24-1) Biographical Sketch

- NSF's implementation is fully compliant with the data elements specified in both Common Forms
- Page limitation has been removed from the biographical sketch
- Synergistic Activities
 - Removed as an element of the biographical sketch.
 - It must be included as a separate upload for each senior/key person in Research.gov.
 - May be up to one page that includes a list of up to five distinct examples that demonstrate the broader impact of the individual's professional and scholarly activities that focus on the integration and transfer of knowledge as well as its creation.



NSF Common Disclosure Forms Implementation Instructions

Common Form Instruction

- Enter the Persistent Identifier (PID) for the senior/key person.
- Products – A list of products that demonstrate the individual's ability to carry out the project.

NSF Instruction

- Enter the ORCID of the senior/key person. (optional)
- Products – Provide a list of up to five products most closely related to the proposed project and up to five other significant products.



PAPPG (NSF 24-1)

Current and Pending (Other) Support

- Required for each individual identified as a senior/key person.
 - Used to assess the capacity or any conflicts of commitment that may impact the ability of the individual to carry out the research effort as proposed.
 - Information helps assess any potential scientific and budgetary overlap/duplication with the project being proposed.
 - Must certify that they are not a party to a MFTRP
- Must be created in SciENCv.



CURRENT AND PENDING (OTHER) SUPPORT COMMON FORM
November 1, 2023

The individual agrees to update this disclosure at the request of the Federal research funding agency prior to the award of support and at any subsequent time the agency determines appropriate during the term of the award. (Refer to the Federal research funding agency's policy on updating award support).

Instructions for Submission of the Current and Pending (Other) Support Common Form

Current and pending (other) support information is used to assess the capacity or any [conflicts of commitment](#) that may impact the ability of the individual to carry out the research effort as proposed. The information also helps assess any potential scientific and budgetary overlap/duplication with the project being proposed.

This document provides instructions on submission of current and pending (other) support information for each individual identified as a [senior/key person](#) on a Federally funded research project.¹

A separate submission must be provided for each proposal and active project, as well as in-kind contributions using the instructions and format specified below. Note that there is no page limitation for this section of the application, though some fields have character limitations for consistency and equity.

Consulting activities must be disclosed under the proposals and active projects section of the form when any of the following scenarios apply:

- The consulting activity will require the senior/key person to perform research as part of the consulting activity;
- The consulting activity does not involve performing research, but is related to the senior/key person's research portfolio and may have the ability to impact funding, alter time or effort commitments, or otherwise impact scientific integrity; or
- The consulting entity has provided a contract that requires the senior/key person to conceal or withhold confidential financial or other ties between the senior/key person and the entity, irrespective of the duration of the engagement.

Consistent with NSPM-33, individuals are required to disclose contracts associated with participation in programs sponsored by foreign governments, instrumentalities, or entities, including [foreign government-sponsored talent recruitment programs](#). Further, if individuals receive direct or indirect support that is funded by a foreign government-sponsored talent recruitment program, even where the support is provided through an intermediary and does not require membership in the foreign government-sponsored talent recruitment program, that support must be disclosed. Individuals must also report other foreign government sponsored or affiliated activities. In accordance with 42 USC § 19232, individuals are prohibited from being a party in a [malign foreign talent recruitment program](#).

¹In accordance with the NSPM-33 Implementation Guidance, senior/key persons typically do not include graduate students.

PAPPG (NSF 24-1)

Summary of Changes

- Proposals that may impact the resources or interests of a federally recognized American Indian or Alaska Native Tribal Nation (Tribal Nation) will not be awarded by NSF without the prior written approval from the designated official(s) from the relevant tribe(s).
- For these purposes, references to “resources or interests of a Tribal Nation” are limited to resources and interests connected to Tribal Nation lands or those aspects of Tribal life that are within the domain of a Tribal Nation, (including, but not limited to, Tribal languages and subsistence rights on Tribal Nation lands) as opposed to individual Tribal Nation members.
- New Proposal Preparation Instructions:
 - New checkbox on the Cover Sheet to indicate if there are “Potential Impacts on Tribal Nations”
 - Proposers seeking funding for such proposals must provide at least one of the following at time of proposal submission:
 - (i) A copy of the written request to the Tribal Nation for the activities that require review and approval;
 - (ii) Prior to award, a written confirmation from the Tribal Nation(s) that review and approval is not required; or
 - (iii) A document providing the requisite approval.



NSF Outreach Opportunities

- Spring 2024 NSF Grants Conference
 - June 3-5 in Philadelphia, PA
 - In-person and virtual options
 - Registration now open
- NSF Policy Office Webinar Series
 - Common Forms Webinar from April 25th
- Resource Center
 - On-demand presentations – searchable by topic and year

For on-demand opportunities and to be notified of upcoming events:

<https://nsfpolicyoutreach.com/>



Additional Resources

- [Policy Office Website](#)
- [PAPPG \(NSF 24-1\)](#)
- [PAPPG \(NSF 23-1\) \(for proposals submitted prior to May 20, 2024\)](#)
- [FAQs On Proposal Preparation and Award Administration](#)
- [Current and Pending \(Other\) Support FAQs](#)
- [NSF Pre-award and Post-award Disclosures Relating to the Biographical Sketch and Current and Pending \(Other\) Support \(for proposals submitted prior to May 20, 2024\)](#)
- [NSTC Pre-award and Post-award Disclosures Relating to the Biographical Sketch and Current and Pending Support](#)
- [Use of Generative Artificial Intelligence Technology in the NSF Merit Review Process](#)



QUESTIONS?



- **Policy Office Website**
<https://nsf.gov/bfa/dias/policy/>
- **NSF Staff Directory**
<https://nsf.gov/staff/>
- **Career Opportunities | National Science Foundation**
<https://new.nsf.gov/careers>