**Action Items from Panel and Program Director for POSE Proposal 2518372– Submit your response within two (2) business days of the date of this request**

**Notes:**

* **Please acknowledge receipt of this communication.**
* **Always include your proposal number on the subject line of any communication with the Program Officer.**

Dear Dr. Ghenis,

**NOTE: If the proposed project includes studies with laboratory animals and/or human subjects, please provide an IRB or IACUC letter as soon as possible. NO AWARD CAN BE MADE WITHOUT AN IRB APPROVAL OR EXEMPTION LETTER, OR AN IACUC AWARD LETTER.**

Thank you for submitting an application to our POSE solicitation. Your POSE Phase I/Phase II proposal has been reviewed by a panel of experts. I need additional information for the ongoing evaluation and due diligence. Please copy/paste this email in MS Word and provide a response to this e-mail in a **Word attachment**. Please respond as soon as possible and definitely within 4 business days. A specific written response is required for each of the following questions or concerns. Each response (a) must be self-contained without referring to other responses (or the proposal) in your reply and (b) should not be more than half page.

Please be aware that this communication is in NO WAY an indication of a successful award. **In fact, many proposals do not make it past this stage.** If you have previously provided some of the information requested below, please include it again in your response to this email.

**SECTION 1:**

During the review process, several weaknesses have been identified that we are giving you an opportunity to address.

**Panel and Program Director Questions:**

Please provide responses to the following questions:

1. Please clarify your tasks to be accomplished and provide quantitative milestones and quantitative outcome metrics.

We will execute integrated ecosystem-building workstreams from August 2025 to July 2026, with all activities funded exclusively by POSE. Our landscape and needs scan (months 1-4) will survey 100-150 stakeholders across six key segments: policy researchers, benefit access organizations, civic tech groups, government agencies, academic institutions, and open-source contributors. We'll ensure at least 10 responses per segment, conduct 8 focus groups with 6-10 participants each, and document 20+ unmet needs and 10+ collaboration opportunities. This will deliver a comprehensive gap-analysis report by month 4, achieving >80% survey completion rate and >90% focus group attendance. We will also build the ecosystem through nine in-person conferences and hosted engagements in various geographies and research communities.

Community programs launching by month 9 include a Benefit Access Partners network, three policy-focused webinars, and weekly Slack office hours. We'll formalize partnerships with 10 new institutional users, optimize our Google Ads Grant monthly, and double monthly visitors from 5,000 to 10,000. Our sustainability workstream will deliver a 3-year financial model, establish IP frameworks including PolicyEngine trademark registration, and critically, launch a public ecosystem metrics dashboard tracking contributors, users, code velocity, and community health indicators over time.

1. Kindly propose alternative strategies if the desired metrics of success are not met.

We've designed specific triggers and corrective actions for each critical metric, with quarterly reviews conducted transparently via GitHub. If survey or focus group participation falls below target by month 3, we'll introduce $50 participation incentives and leverage partnerships with university groups, APSA networks, and civic tech communities. Should board recruitment lag by month 7, we'll engage the Open Source Initiative and Linux Foundation board networks while appointing interim advisors to maintain momentum.

For contributor growth, if external PRs remain below 30/month by month 10, we'll launch a $5,000 micro-grant program for documentation improvements, mentorship activities, and community event organizing, alongside implementing senior-mentor pairing sessions. If our ecosystem dashboard or Software Bill of Materials (SBOM) publication faces delays exceeding 30 days, we'll recruit volunteer DevSecOps specialists and shift to bi-weekly progress updates until back on track.

Financial sustainability contingencies include accelerating corporate partnership outreach if philanthropic commitments lag, and expanding API certification programs if earned revenue falls short of projections. Most critically, if ecosystem discovery reveals fundamental strategic pivots, we'll conduct targeted follow-up research and document learnings for Phase II refinement.

1. Please clarify what has been developed to date and what will be developed under this proposal.

**Already Delivered (Pre-July 2025):**

The PSL Foundation’s PolicyEngine project team has built comprehensive technical infrastructure including U.S. and U.K. tax-benefit microsimulators covering federal, state, and local rules. Our REST API serves production workloads for MyFriendBen and LA County benefit screening tools, while our policy analysis platform (Python package and web app) and report suite serves 5,000+ monthly visitors, including adoption within Congress, think tanks, and academia. We've attracted 130+ GitHub contributors and recently launched an AI-powered policy explanation feature. We will also launch a fresh web app and locally calibrated microdata in fall 2025, enabling state and congressional district simulations.

**Phase I Ecosystem Deliverables (POSE-Funded):**

This grant exclusively funds organizational and community infrastructure. We'll produce a comprehensive ecosystem landscape report documenting stakeholder needs, collaboration opportunities, and strategic gaps.

For contributors, we'll publish a Contributor Guide detailing technical workflows, a maintainer ladder defining advancement paths, and a Code of Conduct ensuring professional participation. Our public ecosystem metrics dashboard will track contributor characteristics, code velocity, user growth, and community health indicators—making PolicyEngine's ecosystem development transparent and measurable. We'll establish community programs including the Benefit Access Partners network for organizations using our tools, regular policy webinars connecting researchers with practitioners, and virtual hackdays expanding our contributor base.

1. Please address your current and planned intellectual property activities.

The PSL Foundation’s PolicyEngine team develops all software–front and back end–open source on GitHub under AGPL-3.During Phase I, we'll establish comprehensive IP policies aligned with our mission.

**Planned Phase I Activities:**

* **Month 2**: Implement Developer Certificate of Origin (DCO) plus lightweight Contributor License Agreement (CLA) ensuring clear inbound licensing while respecting contributor rights
* **Month 3**: File "PolicyEngine" trademark (USPTO Class 42) protecting brand integrity using non-federal funds
* **Month 4**: Release microdata and documentation under CC0 (public domain) or CC BY 4.0, finalizing after community consultation
* **Month 6**: Publish trademark usage guidelines enabling community members to accurately represent their relationship with PolicyEngine
* **Month 8**: Launch Software Bill of Materials (SBOM) automation, refreshed monthly for security transparency
* **Month 12**: Establish "PolicyEngine Certified" program for organizations meeting quality standards, creating sustainable revenue supporting open development

We maintain a strict anti-patent policy—no patents filed or planned—as proprietary restrictions contradict our democratization mission. All IP activities reinforce open collaboration while protecting project integrity and sustainability.

1. Please clarify the aspects of the project that are transformative.

The PolicyEngine project transforms tax-benefit microsimulation from an agency monopoly into community-driven infrastructure, establishing the "Linux of fiscal policy analysis." Where traditional models hide behind institutional walls, we make every calculation transparent, every assumption challengeable, and every enhancement shareable. Phase I's governance and contributor systems enable any researcher, journalist, or community group to engage with equal standing—not as mere users but as co-creators.

The transformation extends beyond transparency to capability democratization. A rural nonprofit can now analyze poverty impacts with the same sophistication as the Congressional Budget Office. Local journalists fact-check political claims using previously inaccessible tools. Benefit navigators help families claim $70 billion in unused support. By establishing formal governance, creating clear contribution pathways, and building sustainable revenue models, we're proving that community-driven development can tackle society's most complex analytical challenges.

Most transformatively, PolicyEngine converts competitive hoarding into collaborative abundance. When commercial users like Impactica enhance California rules, nonprofits nationwide benefit immediately. Academic behavioral modeling improvements help both researchers and benefit navigators. Phase I's ecosystem infrastructure—from contributor guides to metrics dashboards—creates the organizational foundation for this positive-sum dynamic. Success demonstrates that open-source approaches can revolutionize domains traditionally dominated by proprietary gatekeepers, from healthcare modeling to climate analysis, inspiring a new generation of democratic analytical infrastructure.

**SECTION 2:**

**Administrative Certifications:**

1. If there are any overlapping, similar or equivalent past, current or pending applications that have been submitted to other federal agency/agencies as of today’s date, please address the status as below.

(1) provide documentary evidence that any overlapping, similar or equivalent proposal was not funded; or

(2) provide documentary evidence that your overlapping, similar or equivalent proposal has been withdrawn from review; or

(3) provide documentary evidence of the status of any non-NSF applications, and confirm that only one of the applications will be pursued if you are unable to certify and document either #2 or #3

RESPONSE: No overlapping proposals are pending or funded elsewhere.

1. **If you have chosen a duration of less than 12 months, I urge you to re-affirm the timelines and budgets are reasonable for the project or ask for an adjusted timeline (within the max allowed budget).** If necessary, please submit an updated timeline/milestone chart that clearly illustrates the performance plan of your project in a separate file.

RESPONSE: 12‑month timeline remains reasonable; no adjustment requested.

1. Please certify that you will **not use POSE funds** for: (1)the development of open-source products, including tools and artifacts, (2) to fund existing well-resourced, open-source communities or ecosystems, (3) to support the development of products that are proprietary and/or intended for profit.

RESPONSE: Funds will not develop open-source, proprietary, or for-profit products, or support existing well‑resourced ecosystems.

1. **Please confirm that the information provided in the Biographical Sketches of the proposal for the senior personnel on the project is correct and up-to-date.** If applicable, provide updated Biographical Sketches in NSF-approved format for all participants on the project or reference the page number of the proposal where they may be found for each individual.

RESPONSE: Biographical sketches on file remain current.

1. [*This question is for statistical purposes only and does not affect your chances of award*]. Please indicate whether part or all of the fundamental academic research underlying this project was funded by NSF. If so, please provide the NSF award number(s).

RESPONSE: No prior NSF funding underpins this project.

1. **As applicable for applicant and/or all other organizations involved as for example subawardee, subcontractor, etc. please provide proof of right to use the addresses for company business** (copy of business license, copy of the lease or signed letter from someone authorized to allocate that space). Write n/a if all organization are Institutes of Higher Education (IHEs).

RESPONSE: N/A, as we work remotely.

1. **Please certify in writing** that the PI on the award has the legal right to work in the U.S., and she/he will be primarily employed by the proposing organization for the duration of the award, and does not have primary appointment(s) at non-U.S. based non-profit or non-U.S. based for-profit organizations.

RESPONSE: Max Ghenis is a U.S. citizen and will be primarily employed by the proposing organization for the duration of the award; he holds no foreign primary appointments.

1. The section 889(a)(1)(B) of the John S. McCain National Defense Authorization Act (NDAA) for Fiscal Year (FY) 2019 (Pub. L. 115-232) prohibits the head of any federal agency from procuring contracts with or issuing grants to entities that use equipment or services from Huawei Technologies Co Ltd, ZTE Corp, Hytera Communications Corporation, Hangzhou Hikvision Digital Technology Company, or Dahua Technology Company (or any subsidiary or affiliate of such entities), as a substantial or essential component of any system or as critical technology as part of any system. Please certify in writing that you do not currently nor will enter into a contract (or extend or renew a contract) to procure or obtain equipment, services, or systems that uses covered telecommunications equipment or services as a substantial or essential component of any system, or as critical technology as part of any system produced by Huawei Technologies Company or ZTE Corporation (or any subsidiary or affiliate of such entities), or video surveillance and telecommunications equipment produced by Hytera Communications Corporation, Hangzhou Hikvision Digital Technology Company, or Dahua Technology Company (or any subsidiary or affiliate of such entities).

RESPONSE: We do not and will not use covered telecom equipment or services.

1. Please provide in writing the details of **3 alternate quotes for any outsourced work** outlined in this proposal (EXCLUDING SUBAWARDS), and provide a justification of the consultants or services or products you plan to utilize in this proposal.

RESPONSE: Alternates for Dan Feenberg’s economics consulting services include:

* Martin Holmer, economist with experience developing tax simulation models, $200/hour
* Don Boyd, economist with experience developing tax simulation models, $400/hour
* McKing Consulting Corporation – Economist III, $147.63/hour

Feenberg authored TAXSIM, formed its user community, and is collaborating with PolicyEngine under a MOU with NBER to migrate its backend to our open-source system. He is the lowest cost and uniquely qualified.

Other products we may utilize in this proposal include Slack, Google Cloud Platform, and GitHub. These are industry standards in their respective markets, and we have utilized them in the past.

1. (Non-profit, non-academic organizations, and For-profit organizations) A business has the freedom to pursue any technology and market area, with notable exceptions. One of these exceptions are projects where the envisioned pathways involve the production, distribution, or sale by the company of chemical components, natural or synthetic variations thereof, or other derivatives related to Schedule I controlled substances. If your company is directly involved in any products related to Schedule I controlled substances, NSF cannot support a proposal from your company, even if the proposal does not focus on these products. **Please certify in writing that the company is not directly involved in commercialization of any products related to Schedule I controlled substances.**

RESPONSE: We are not directly involved in commercialization of any products related to Schedule I controlled substances.

1. **Ownership and Control Requirements (If Applicable):** Non-profit and for-profit proposing organizations must be U.S.-based, and U.S.-owned and controlled. Please provide a detailed **Capitalization Table** showing percentage of company/organization ownership per person/entity. As outlined in the solicitation, a majority (more than 50%) of a proposing organization's equity (e.g., stock) must be directly owned and controlled by one of the following:

(1) One or more individuals who are citizens or permanent residents of the U.S.;

(2) Other U.S. firms, each of which is directly owned and controlled by individuals who are citizens or permanent residents of the U.S.;

(3) A combination of (1) and (2) above.

Please provide a detailed **Capitalization Table** showing percentage of company/organization ownership per person/entity. Please include a column in the capitalization table indicating if each person/entity is a US Citizen/Permanent Resident or not. In that column indicate for every line-item whether the line-item entry is (1), (2) or (3) from above or Not Applicable (N/A). Please identify if share options have been exercised and to which individual or entity these belong.

Write n/a if all organization are IHEs.

RESPONSE: The PSL Foundation is a non‑stock 501(c)(3) with no equity owners.