



August 30, 2025

FOIA Officer
Office of the General Counsel
U.S. National Science Foundation
2415 Eisenhower Avenue
Alexandria, Virginia 22314

**Re: Freedom of Information Act Request — Organoid Intelligence / “Humane Endpoints”
(Jan 1, 2020–Present)**

Dear FOIA Officer:

Pursuant to the Freedom of Information Act, 5 U.S.C. § 552, the Sentient AI Protection & Advocacy Network (SAPAN), a U.S. 501(c)(3) nonprofit, respectfully requests the records described below. We seek these records to inform policymakers, researchers, journalists, and the public about ethical guardrails governing organoid intelligence (biocomputing) and any humane-endpoint standards (pre-defined stop-conditions intended to prevent suffering).

Records Requested (Jan 1, 2020–present)

Please conduct a reasonable search of electronic and paper records and produce the following, for NSF (not OIG):

1. EFRI: BEGIN OI program materials: program solicitations, FAQs, webinar slide decks/recordings, internal guidance to program officers, and award lists with funded

abstracts referencing organoid intelligence / organoid-based computing (a/k/a “biocomputing with brain organoids”).

2. Merit review artifacts and risk/ethics materials: panel summaries, award recommendation memoranda, risk analyses, and ethics assessments for awarded BEGIN OI proposals and any other NSF awards that materially involve organoid-based computing. (Please redact PII and proprietary content as required; release all reasonably segregable portions.)
3. Inter-directorate communications and policy memos (BIO, CISE, ENG, TIP) that substantively address humane endpoints, sentience/consciousness assessment, donor consent for computing uses, or welfare safeguards for organoid-computing projects.
4. Contracts/MOUs/SOWs with outside entities (universities, bioethics boards, advisory firms) retained to provide ethics advisory, red-team, or evaluation services for organoid-computing projects.

Helpful search terms (non-exhaustive): “organoid intelligence,” “organoid computing,” “brain organoid computing,” “biocomputing,” “BEGIN OI,” “EFRI,” “humane endpoint(s),” “sentience,” “consciousness,” “distress markers,” “donor consent,” “welfare safeguard(s).” Likely custodians include EFRI/ENG program leadership and staff supporting BEGIN OI, and relevant policy staff in BIO/CISE/TIP.

Form of Production

Please provide records electronically (native files where practicable; otherwise searchable PDF) via secure download link or email. If any records are only available in paper, scanned PDFs are preferred.

Fees and Fee Category

Requester Category: Educational or Non-Commercial Scientific (nonprofit).

Fee Waiver: We request a public-interest fee waiver under 5 U.S.C. § 552(a)(4)(A). Disclosure will contribute significantly to public understanding of federal oversight of organoid-computing ethics and is not primarily in SAPAN's commercial interest. SAPAN will analyze and publish responsive records and a plain-language brief on sapan.ai and distribute findings to journalists, policymakers, and researchers. If fees are assessed despite the waiver, SAPAN agrees to pay up to \$50 without further approval.

Segregability, Withholdings, and Rolling Releases

If you determine portions of a record are exempt, please release all reasonably segregable non-exempt portions and identify each exemption applied. For any withholdings under Exemptions 4 or 5, please provide a description sufficient to permit meaningful review (e.g., an index). We welcome rolling releases as records are processed.

Please direct questions or narrowing proposals to: foia@sapan.ai

Thank you for your consideration and for NSF's commitment to timely, transparent FOIA processing. We look forward to your acknowledgment letter with a tracking number and to working collaboratively to focus the search as needed.

Respectfully,



Tony Rost
Executive Director
Sentient AI Protection & Advocacy Network (SAPAN)
EIN: 99-0606146