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October 31, 2022

Suzanne H. Plimpton, Reports Clearance Officer
National Science Foundation
2415 Eisenhower Avenue
Suite E7400
Alexandria, VA 22314

Re: 87 FR 53505: Agency Information Collection Activities: Request for Comment Regarding Common Disclosure Forms for the Biographical Sketch and Current and Pending (Other) Support

Submitted electronically to splimpto@nsf.gov.

The Association of American Medical Colleges (AAMC) appreciates the opportunity to provide feedback to the National Science Foundation (NSF) and the National Science and Technology Council's (NSTC) Research Security Subcommittee, on common disclosure forms for the Biographical Sketch and Current and Pending (Other) Support sections of a research application. In addition to these comments, we would like to recommend to NSF the joint letter submitted by AAMC and several other higher education associations in response to this query, which highlights the importance of clarifying definitions, ensuring a transparent and uniform process for updating the common forms, and limiting agency variation in required disclosure data elements and instructions.

The AAMC is a nonprofit association dedicated to improving the health of people everywhere through medical education, health care, medical research, and community collaborations. Its members comprise all 156 accredited U.S. medical schools; 14 accredited Canadian medical schools; approximately 400 teaching hospitals and health systems, including Department of Veterans Affairs medical centers; and nearly 80 academic societies. Through these institutions and organizations, the AAMC leads and serves America's medical schools and teaching hospitals and the millions of individuals across academic medicine, including more than 191,000 full-time faculty members, 95,000 medical students, 149,000 resident physicians, and 60,000 graduate students and postdoctoral researchers in the biomedical sciences. Following a 2022 merger, the Alliance of Academic Health Centers and the Alliance of Academic Health Centers International broadened the AAMC's U.S. membership and expanded its reach to international academic health centers.

As federal research agencies move quickly to implement the recommendations of National Security Presidential Memo-33 (NSPM-33)¹ under the leadership of the NSTC, AAMC strongly supports the focused effort to standardize and streamline disclosure requirements across federal agencies as well as create a set of common forms to report these disclosures during the grant application process.

Harmonization has the potential to promote compliance and reduce administrative burden while addressing federal funding agencies' need for information to address research security concerns. However, we caution that substantial changes to current forms and practices could initially increase burden and costs by requiring institutions to overhaul existing policies, software, and training. Any subsequent revisions to those forms again require modifications to all of those systems. Thus, the expertise and engagement of research institutions is key for arriving at the most effective and efficient processes, and we hope this will continue as further policies are developed.

We have provided more detailed comments on additional topics below. The responses reflect the outcomes of conversations between AAMC and constituents at AAMC's member medical schools and teaching hospitals.

Estimation of the burden on researchers and institutions

Conversations with AAMC constituents flagged concerns that the estimate of time for completing both the Biographical sketch (Biosketch) and the Current and Pending (Other) Support form as set forth in the Federal Register did not reflect the actual effort or time commitment required of researchers. While NSF has estimated that it would take one hour to complete both the Biosketch and the form, input from AAMC constituents conveyed that it can take up to three hours to complete a Biosketch for the first time (with less than an hour to update it). Similarly, the Current and Pending (Other) Support form was reported to take over an hour to complete. Investigators also noted that the estimates should be expanded to account for the additional time needed when applying to or receiving funding from multiple federal agencies.

Importantly, researchers and institutional administrators conveyed that estimating burden using only the time needed to complete these forms substantially underestimates the time and effort required to collect, review, and report those disclosures. The true cost and time burden includes building information systems, constantly updating the necessary infrastructure and coordinating processes among disparate offices to report to multiple agencies. This process is further complicated when a hospital is involved, when reporting effort around clinical research, or when storing confidential data. Finally, constantly changing requirements present one of the biggest challenges—each time an agency changes a component of the forms or requests unique information, it becomes increasingly difficult to automate a system to collect these data points and the burden subsequently increases.

¹ NSPM-33 is available here: [Presidential Memorandum on United States Government-Supported Research and Development National Security Policy – The White House \(archives.gov\)](https://www.archives.gov/files-media/press-releases/2017/07/20170714-nspm-33)

A system to collect and report disclosures

Institutions expressed to AAMC that current information transfer is manual, and that no systems were originally set up to have the type of information exchange needed to efficiently report on the disclosures being requested. It is thus very expensive and time-consuming to develop system integration across a variety of software platforms that currently store the requested information.

AAMC has previously shared with NSF, OSTP, and the NSTC Research Security Subcommittee the potential of Convey, the AAMC-developed global disclosure system, to address some of these integration issues. The system was developed at the request of an Institute of Medicine (now National Academies) workgroup to fill an unmet need to reuse disclosure data for multiple purposes and for institutions to link existing systems through public APIs. Already in use by many journals, academic societies, and organizations, Convey can collect and store any of the requested information and can be adapted to the disclosure needs of the receiving organization, a key point when some agencies may request additional data beyond the common elements. Importantly, Convey can also connect disclosure information to digital persistent identifiers, through its integration with the ORCID iD. The AAMC would be glad to continue this discussion, as the implementation of NSPM-33 moves forward.

Given the enormous undertaking and substantial impact of this harmonization effort, we hope there will be ongoing opportunities for the scientific community to engage and comment on individual agency plans as they move forward. Any measures that are developed outside of this overall coordinated effort will undercut cross-agency harmonization and make such efforts more difficult in the future.

We look forward to continued engagement with the NSTC Research Security Subcommittee as the process of NSPM-33 implementation moves forward. Please feel free to contact me or my colleagues Anurupa Dev, PhD, Lead Specialist for Science Policy (adev@aamc.org) or Heather Pierce, JD, MPH, Senior Director for Science Policy (hpierce@aamc.org) with any questions about these comments.

Sincerely,

A handwritten signature in blue ink, appearing to read "Ross McKinney, Jr., MD". The signature is stylized and includes a small circular mark at the end.

Ross McKinney, Jr., MD
Chief Scientific Officer

cc: David J. Skorton, MD, AAMC President and Chief Executive Officer