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September 5, 2023

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

**Re: Agency Information Collection Activities; Request for Public Comment on Common Disclosure Forms for the Biographical Sketch and Current and Pending (Other) Support for Use in Submission of Research Applications (88 FR 52215)**

*Submitted electronically at <http://www.reginfo.gov/public/do/PRAMain>.*

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.

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 are all 157 U.S. medical schools accredited by the Liaison Committee on Medical Education; 12 accredited Canadian medical schools; approximately 400 academic health systems and teaching hospitals, including Department of Veterans Affairs medical centers; and more than 70 academic societies. Through these institutions and organizations, the AAMC leads and serves America's medical schools, academic health systems and teaching hospitals, and the millions of individuals across academic medicine, including more than 193,000 full-time faculty members, 96,000 medical students, 153,000 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 participation in the AAMC by U.S. and international academic health centers.

As stated in both individual<sup>1</sup> and joint<sup>2</sup> letters to the NSF in response to the first notice on these proposed common disclosure forms, AAMC strongly supports federal efforts to standardize and

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<sup>1</sup> AAMC Comments to NSF. 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. Oct. 31, 2022. <https://www.aamc.org/media/63221/download?attachment>

<sup>2</sup> AAU, AAMC, APLU, COGR, ACE. Agency Information Collection Activities: Request for Comment Regarding Common Disclosure Forms for the Biographical Sketch and Current and Pending (Other) Support. Oct. 31, 2022. <https://www.aamc.org/media/63226/download?attachment>

streamline disclosure requirements needed to implement National Security Presidential Memorandum 33 (NSPM-33) and address research security concerns. Standardizing the information collection required across federal agencies will facilitate institutional compliance while also reducing administrative burden.

We appreciate the replies from NSF addressing the comments in response to the initial notice and the resulting modifications to the proposed forms. In particular, the increase of the estimated burden hours is a closer reflection of the feedback we received from AAMC member institutions. Additionally, the updates clarifying the definitions for consulting activities, in-kind contributions, and types of personnel subject to the requirements are key elements for institutions to understand what information needs to be reported.

The AAMC looks forward to continued engagement with NSF as the agency moves forward with NSPM-33 implementation. We also reiterate that 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 note that it is very likely that institutions will require additional clarity post-implementation and urge NSTC and NSF to publish additional information in form of FAQ or guidance as needed in the future. AAMC would be glad to assist in identifying institutions to provide feedback on proposed policies or aspects of implementation.

Please feel free to contact me or my colleagues Anurupa Dev, PhD, Director of Science Policy and Strategy ([adev@aamc.org](mailto:adev@aamc.org)) and Heather Pierce, JD, MPH, Senior Director for Science Policy and Regulatory Counsel ([hpierce@aamc.org](mailto:hpierce@aamc.org)) with any questions about these comments.

Sincerely,

A handwritten signature in blue ink, appearing to read "Ross McKinney, MD". The signature is fluid and cursive, with a distinct "MD" at the end.

Ross McKinney, MD  
Chief Scientific Officer

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