American Society for
Biochemistry and Molecular Biology
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RE: Common Disclosure Forms for the Biographical Sketch and Current and Pending Support

The American Society for Biochemistry and Molecular Biology is an international nonprofit scientific and educational organization that represents more than 10,000 students, researchers, educators and industry professionals. Founded in 1906 to advance the science of biochemistry and molecular biology, the society publishes three peer-reviewed journals, supports science education at all levels, and promotes the diversity of individuals entering the scientific workforce. The ASBMB strongly advocates for strengthening the science, technology, engineering and mathematics (STEM) workforce, supporting sustainable funding for the American research enterprise, and ensuring diversity, equity and inclusion in STEM.

The ASBMB appreciates the substantial efforts undertaken by the White House Office of Science and Technology Policy in implementing NSPM-33 to lessen the administrative burden that federally funded scientists face when managing their grants. As we've said before, harmonizing disclosure forms will also help prevent foreign influence on research integrity and safeguard research security, while increasing openness, transparency and international collaboration. The ASBMB has made several recommendations to the OSTP and federal agencies for implementing National Security Presidential Memorandum 33 and continues to be an engaged stakeholder in the process.

To formulate additional recommendations (below) for improving disclosure, we worked closely with ASBMB members who serve on the Public Affairs Advisory Committee and who are federally funded (including but not limited to the National Institutes of Health, the National Science Foundation, the Department of Energy, the Department of Defense and the Department of Veteran Affairs).

Improving the Biographical Sketch form

Recommendation 1: Use existing semi-automated systems to generate the biosketch.

Many principal investigators already have created biosketches for funding agencies. The OSTP should strongly recommend that agencies use a semi-automated systems to generate the new biosketch (one example is SciENcv). Doing so would significantly reduce the time principal investigators spend re-creating a biosketch in the new form.

If a semi-automated system is not feasible, providing an option for principal investigators to submit their current NIH or NSF biosketch into a database and build off of the existing form is also a solution is preferred rather than having to create new submissions for each entry.

Recommendation 2: Reduce requirements for the products section.

As currently written, it is unclear if all products a principal investigator has ever contributed to must be included in the biosketch. If that is the requirement, we urge the OSTP to reconsider. Most researchers

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produce about 20 publications a year; filling out all publications, i.e., products, would take unnecessarily long to input. Federal agencies should adopt what is outlined in the NIH's biosketch: PIs are asked to choose a select number of the most relevant products/papers.

Improving the Current and Pending (Other) Support form

Recommendation 1: Clearly define "in kind support" and clarify what is included in the definition.

As the guidance is currently written, "in kind support" includes every piece of equipment and all supplies. It is not feasible for PIs to document and estimate the cost of each item in a single form. According to this guidance, every single plasmid, cell line, set of pipets, microfuge, etc. would need to be documented, resulting in hundreds of hours of administrative labor. This type of information has no bearing on the quality of a research project. In addition, principal investigators cannot estimate the financial value of everything in their laboratory.

Federal agencies should define clearly "in kind support" and restrict what falls in this category to ensure that scientists are not spending hundreds of hours attempting to track down the origins and value of all the equipment and supplies in their labs.

Recommendation 2: Clarify the "person-months" description.

The section that explains "person-month(s) per year committed to the project" is unclear as written. Instead of aligning the person-months to the budget period, this should be changed to ask for the months during that budget period.

Recommendation 3: Provide examples, including completed forms with references to types of support.

Lastly, we strongly urge the OSTP and federal agencies to provide examples of completed forms with different types of support to give clear guidance to investigators.

These harmonized forms are a step in the right direction, but the instruction pages must go through several rounds of review and changed accordingly.