

SUPPORTING STATEMENT – PART A
National Science Foundation
Common Disclosure Forms for the Biographical Sketch and Current and Pending (Other)
Support
OMB Control No. 3145-NEW

A. Justification

1. Necessity of the Information Collection

The National Science Foundation (NSF), on behalf of the National Science and Technology Council’s (NSTC) Research Security Subcommittee, is seeking approval for common disclosure forms for the Biographical Sketch and Current and Pending (Other) Support sections of a research application. NSF has agreed to serve as steward of these common disclosure forms, and, in this capacity, will be responsible for collection and resolution of public comments, as well as for posting and maintaining these common disclosure forms (including subsequent revisions) and other associated documents on the “[NSTC Research Security Subcommittee, NSPM-33 Implementation Guidance, Disclosure Requirements & Standardization](#)” webpage of the NSF website. The NSTC Research Security Subcommittee, has developed this information collection as common disclosure forms to enable Federal research funding agencies beyond NSF to streamline the information collection process in coordination with OMB.

Section 4(b) of National Security Presidential Memorandum-33 (NSPM-33) directs that “research funding agencies shall require the disclosure of information related to potential conflicts of interest and commitment from participants in the Federally funded R&D enterprise... The appropriate disclosure requirement varies depending on the individual’s role in the United States R&D enterprise.” Section 4(b)(vi) directs that “agencies should standardize forms for initial disclosures as well as annual updates, ... and should provide clear instructions to accompany these forms and to minimize any associated administrative burden.”

These common disclosure forms are intended to clarify what is expected of senior personnel applying for R&D funding from Federal research funding agencies. Variations among Federal research funding agencies will be limited to cases: (a) where required by statute or regulation; (b) where more stringent protections are necessary for protection of R&D that is classified, export-controlled, or otherwise legally protected; or (c) for other compelling reasons consistent with individual agency authorities and as coordinated through the NSTC.

Agencies may develop agency- or program-specific data elements and instructions, if necessary, to meet programmatic requirements, although agencies will be instructed to minimize the degree to which they supplement the common forms. Modification and/or supplementation of these common disclosure forms will require clearance by OMB/OIRA under the Paperwork Reduction Act (PRA) process.

2. Needs and Uses

The NSTC Research Security Subcommittee has worked to develop harmonized disclosure requirements for use by senior/key persons, as well as to develop proposed common disclosure forms for the Biographical Sketch and Current and Pending (Other) Support sections of an application for Federal research and development (R&D) grants or cooperative agreements. The purpose of the Biographical Sketch is to assess how well qualified the individual, team, or organization is to conduct the proposed activities. The purpose of Current and Pending (Other) Support is to assess the capacity of the individual to carry out the research as proposed and to help identify any potential scientific and budgetary overlap/duplication, as well as overcommitment with the project being proposed. These common disclosure forms are intended to replace forms/formats currently used by agencies for these sections of applications, thereby increasing the consistency of disclosure forms and reducing administrative burden.

As stated in the NSPM-33 Implementation Guidance, “the goal of these common forms and accompanying instructions is to ensure that applying for awards from any Federal research funding agency will require disclosing the same information in the same manner, to increase clarity and reduce administrative burden on the research community. In some cases, research agencies may adapt the forms and instructions, where required by their legal authorities. Such common forms also will allow the research community to identify and point out where greater clarity may be needed.”

3. Use of Information Technology

For purposes of NSF, these common disclosure forms must be used by senior/key persons to develop their biographical sketch and current and pending (other) support in [SciENcv](#) and included in the application submitted to the Foundation. The application must be submitted either through use of [Research.gov](#) (NSF’s main proposal submission vehicle), or [Grants.gov](#), which has its own OMB clearance under 4040-0002. Other Federal research funding agencies may utilize different electronic systems for use in development of the application which will be cleared separately by OMB/OIRA under the PRA process.

4. Efforts to Identify Duplication

Given that these are Common Forms, there will be no duplication.

5. Impact on Small Entities

This collection will not have a significant impact on a substantial number of small businesses.

6. Consequences of Less Frequent Collection

Not applicable.

7. Special Circumstances

This information collection will be conducted in a manner consistent with the general information guidelines.

8. Consultations Outside the Agency

As required by 5 CFR 1320.8(d), comments on the information collection activities were solicited through the publication of a 60-Day Notice in the Federal Register at 87 FR 53505. NSF received 100 discrete comments in response to the 60-day Notice. Commenters included individuals, professional societies, institutions of high education, and federal agencies. Responses to each of the comments submitted can be found in the attached Comment Table. Additionally, NSF and other U.S. Government representatives consulted with several stakeholders through meetings, conferences, and presentations to receive input. These stakeholders included university professional associations as well as faculty associations and bodies of the National Academies of Science, Engineering, and Mathematics. The National Science and Technology Council's Subcommittee on Research Security also held several virtual listening sessions to receive feedback.

9. Paying Respondents

Not applicable.

10. Assurance of Confidentiality

The information from these forms will be covered by NSF's Privacy Act System of Records, in particular, NSF-50, "Principal Investigator/Proposal File and Associated Records."

11. Justification for Sensitive Questions

No sensitive questions are asked as part of this information collection. Senior/key persons are advised not to submit any personal information. This includes items such as: home address;

home telephone, fax, or cell phone numbers; home e-mail address; driver’s license number; marital status; personal hobbies; and the like. Such personal information is not appropriate and is not relevant to the merits of the proposal.

12. Estimate of Hour Burden

As these will be common disclosure forms, the following burden table is applicable only to NSF. The Foundation expects an annual rate of 46,500 applications per year, with an estimate of two hours for each form per applicant. On average, there are four senior/key persons per application, and the following table lays out the burden estimate per proposal.

Form Name	Number of Proposals (estimated)	Number of respondents (estimated)	Burden time (hours)	Total
Biographical Sketch	46,500	4	2	372,000
Current and Pending (Other) Support	46,500	4	2	372,000
Total burden hours				744,000

13. Estimate of Cost Burden

Beyond the hourly burden, there are no respondent or record keeper costs estimated for this collection.

14. Cost to Federal Government

NSF Office of Budget, Finance, and Award Management

Policy Office Head 3 months x AD-5 = \$46,800
1 Senior Policy Specialist 1 month x GS-14 = \$12,100
1 Policy Analyst 20 hours x GS-13 = \$1,500

NSF Office of the Director

Chief of Research Security, Strategy, and Policy 1 week x SES Pay Band C = \$4,000

National Institutes of Health

Director, Office of Policy for Extramural Research Administration 2 months at SES Pay Band C = \$32,000

Total Salaries: \$96,400

15. Reason for Change in Burden

Not applicable. This is a new request for common forms.

16. Project Schedule

Not applicable.

17. Request to Not Display Expiration Date

The OMB expiration dates of the common disclosure forms will be displayed on the NSTC Research Security Subcommittee, “NSPM-33 Implementation Guidance Disclosure Requirements & Standardization” webpage of the NSF website, the information collection screens in SciENCv, as well as within Research.gov and Grants.gov.

18. Exceptions to the Certification

There are no exceptions.

B. Collections of Information Employing Statistical Methods

Not applicable.

Attachments:

Biographical sketch Common Form and associated instructions

Current and Pending (Other) Support Common Form and associated instructions

Comment Table