



EXECUTIVE OFFICE OF THE PRESIDENT
WASHINGTON, D.C. 20503

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MEMORANDUM FOR THE HEADS OF FEDERAL RESEARCH AGENCIES

FROM: ARATI PRABHAKAR
DIRECTOR
OFFICE OF SCIENCE AND TECHNOLOGY POLICY

SUBJECT: Policy Regarding Use of Common Disclosure Forms for the “Biographical Sketch” and the “Current and Pending (Other) Support” Sections of Applications by Federal Research Funding Agencies

I. Purpose and Use of the Common Forms

This policy requires federal research funding agencies to use harmonized common disclosure forms for the Biographical Sketch and the Current and Pending (Other) Support portions of funding application packages for grants and cooperative agreements (i.e., the Common Forms), except as otherwise provided below. The National Science and Technology Council (NSTC) Research Security Subcommittee has worked to develop consistent disclosure requirements, as directed under section 4(b) of [National Security Presidential Memorandum 33 \(NSPM-33\)](#)¹, including with resolution of comments submitted through the Paperwork Reduction Act (PRA) notice published in the Federal Register. The Common Forms also provide general standards for agencies to develop forms for use in their own research and development (R&D) programs.

The [Biographical Sketch Common Form](#)² provides instructions for submission of a biographical sketch by each individual identified as a covered individual or senior/key person on a federally funded research project. The biographical sketch is used to assess how qualified the individual, team, or organization is to conduct the proposed activities.

The [Current and Pending \(Other\) Support Common Form](#)³ is used to assess the capacity or any conflicts of commitment that may impact the ability of the individual to carry out the research effort as proposed. The information also helps assess any potential scientific and budgetary overlap/duplication with the project being proposed.

¹ <https://trumpwhitehouse.archives.gov/presidential-actions/presidential-memorandum-united-states-government-supported-research-development-national-security-policy/>

² https://www.nsf.gov/bfa/dias/policy/researchprotection/commonform_biographicalsketch.pdf

³ https://www.nsf.gov/bfa/dias/policy/researchprotection/commonform_cps.pdf

The Common Forms will replace other forms and formats that agencies currently use to disclose biographical sketch, and current and pending (other) support information, when applicants apply for federal research funding. Federal funding agencies may also use these Common Forms for contracts, as appropriate.

The National Science Foundation (NSF) has agreed to serve as steward of the Common Forms. The Common Forms and related information are available on the NSF website at: https://www.nsf.gov/bfa/dias/policy/nstc_disclosure.jsp.

Consistent with the PRA and the Privacy Act, a Privacy Act and Burden Statement must appear on the Common Forms, specific to that agency. An agency may not conduct or sponsor, and a person is not required to respond to, an information collection subject to the requirements of the PRA unless it displays a valid Office of Management and Budget (OMB) control number. The OMB control number for the Common Forms is 3145-0279. Each federal research funding agency that uses these forms must also incorporate their specific System of Records Notice in their PRA common forms request submitted to The Office of Management and Budget's Office of Information and Regulatory Affairs (OMB/OIRA) for clearance. Guidance for federal research funding agencies on obtaining approval from OMB/OIRA to use the Common Forms may be obtained from agency PRA Officers.

There may be cases where agencies choose not to use these Common Forms for reasons specified by statute, regulation, specific agency authorities, or other compelling reasons. In some cases, agencies may choose not to use these Common Forms because of a need to collect additional information or to apply more stringent protections to protect R&D that is classified, export-controlled, or otherwise legally protected. Deviation from the common disclosure forms will require OMB/OIRA review and clearance under the PRA.

II. Federal Research Funding Agency Implementation

To implement the use of Common Forms, each federal research funding agency, defined in the January 2022 [NSPM-33 Implementation Guidance](#)⁴ as any federal department or agency with an annual extramural research expenditure of over \$100,000,000, will be required to submit an implementation plan to the Office of Science and Technology Policy (OSTP) within 90 days following the issuance of this policy. The implementation plan should include specific details regarding use of the Common Forms, including:

- a. the anticipated implementation date;
- b. any planned deviations from the content of the Common Forms; and
- c. information regarding electronic implementation of the Common Forms.

Federal research funding agencies should ensure that applicants using the Common Forms include a persistent digital identifier that meets the requirements articulated in both the 2022 OSTP [NSMP-33 Implementation Guidance](#) and the 2022 OSTP [Public Access Policy Guidance](#)⁵.

⁴ <https://www.whitehouse.gov/wp-content/uploads/2022/01/010422-NSPM-33-Implementation-Guidance.pdf>

⁵ <https://www.whitehouse.gov/wp-content/uploads/2022/08/08-2022-OSTP-Public-Access-Memo.pdf>

Consistent with Section 10637 of the CHIPS and Science Act of 2022 and the goals of Executive Orders 13985 and 14091, agencies should engage in monitoring and evaluation to ensure that use of Common Forms does not target, stigmatize, or discriminate against (or create institutional policies or barriers within federal programs and services that may disadvantage or burden) individuals on the basis of race, color, ethnicity, religion, sex (including pregnancy, sexual orientation, or gender identity), national origin, age (40 or older), disability, and genetic information (including family medical history), consistent with Title VI of the Civil Rights Act of 1964. Agencies should consult with their Offices of Civil Rights, or their equivalents, in addition to bodies charged with the implementation of Executive Orders 13985 and 14091 as part of their monitoring and evaluation activities.