Guidance on Purchasing of Synthetic Nucleic Acids or Synthesis Equipment at Texas A&M

Beginning April 26, 2025, the Texas A&M University Institutional Biosafety Committee (IBC) will require all researchers to order synthetic nucleic acids or purchase nucleic acid synthesis equipment only from providers or manufacturers who adhere to the OSTP Nucleic Acid Synthesis Screening Framework ("Framework") requirements. These requirements apply to all life sciences research, regardless of funding source, including research conducted outside the U.S. if supported by Texas A&M University.

Before Acquiring Nucleic Acid Synthesis Products or Synthesis Equipment

1. **Verify the Provider's Attestation to the Framework**:
   - Providers must attest to implementing the screening Framework through a statement that is either posted on a public website or provided to you.
   - For additional information and current list of providers with Framework attestation statements see: https://research.tamu.edu/story/new-federal-guidelines-will-limit-how-researchers-buy-synthetic-dna/
2. **Obtain IBC Approval**:
   - Confirm you have IBC approval to use the nucleic acid synthesis product(s) or synthesis equipment.
   - For questions about IBC approval for other synthetic nucleic acid sequences, contact biosafety@tamu.edu.
3. **Obtain other institutional approvals, if required.**
   Activities involving Sequences of Concern* and the purchase of synthesis equipment must be reviewed by the Research Security and Export Controls Office
   - For questions about Research Security & Export Control approval, contact exportcontrols@tamu.edu (TAMU), ethics-compliance@ag.tamu.edu (AgriLife), or . researchcompliance@tees.tamus.edu (TEES)
4. **Ensure you have a Material Transfer Agreement (MTA), if required**
   - For questions about MTAs, contact negotiations@tamu.edu (TAMU), ethics-compliance@ag.tamu.edu (AgriLife), or innovationsandcontracts@tamu.edu (TEES).

Before Developing Nucleic Acid Synthesis Equipment

Individuals interested in developing nucleic acid synthesis equipment should consult with the IBC and the office of Research Security & Export Controls **before** developing such equipment to ensure they understand and are capable of meeting the provider obligations outlined in the Framework including the requirement to Attest to compliance with the Framework.

The Framework mandates comprehensive screening mechanisms to prevent misuse of synthetic nucleic acids. These requirements include screening procedures to verify the legitimacy of customers and their intended use of synthetic nucleic acids, following technical standards set by the National Institute of Standards and Technology, compliance for continued funding, and regular updates of screening processes and customer verification methods.

References:

- https://aspr.hhs.gov/S3/Documents/OSTP-Nucleic-Acid-Synthesis-Screening-Framework-Sep2024.pdf
- https://grants.nih.gov/grants/guide/notice-files/NOT-OD-25-012.html

*Per the Framework, and at the time of its issuance, a Sequence of Concern is described as a nucleotide sequence or its corresponding amino acid sequence that is a Best Match to a sequence of federally regulated agents (i.e., the Biological Select Agents and Toxins List (BSAT), or the Commerce Control List (CCL)), except when the sequence is also found in an unregulated organism or toxin. As of and after October 13, 2026, this definition will include sequences known to contribute to pathogenicity or toxicity, even when not derived from or encoding regulated biological agents.