

Customers: Actions for Compliance

Beginning October 26, 2024, federal agencies funding life sciences research (such as the National Institute of Allergy and Infectious Diseases, National Science Foundation, Department of Defense, Department of Agriculture, and Department of Energy) will require Customers to purchase nucleic acids only from Providers or Manufacturers who self-attest to adherence with §4(b) of the [Executive Order on the Safe, Secure, and Trustworthy Development and Use of Artificial Intelligence](#) (AI EO) and the resulting [US Framework for Nucleic Acid Synthesis Screening](#) (Framework).

A Customer can ensure that they purchase from a Provider or Manufacturer that adheres to the Framework by either:

- 1) **Checking a Provider or Manufacturer’s website for a self-attestation to the Framework;**
or
- 2) **Requesting a self-attestation from a Provider or Manufacturer.**

For assistance identifying compliant Providers and Manufacturers, Customers can scan this QR code to view a continuously updated [List of Framework-Attesting Nucleic Acid Synthesis Providers & Benchtop Manufacturers](#).



Who is a Customer?

The Framework defines a Customer as an “individual or entity (such as an institution) that orders or requests synthetic nucleic acids from a Provider, or that purchases nucleic acid synthesis equipment from a Manufacturer.” More details about who qualifies as a Customer may become more clear on or after October 26, 2024, when federal funding agencies implement the funding requirements outlined by the [AI EO](#).

Please note: If you are a biofoundry, cloud lab, core facility/academic core facility, or contract research organization (CRO) that “*synthesizes and distributes synthetic nucleic acids as a transactional service,*” **you are considered a Provider under the Framework.**

What kinds of life sciences research does the Framework apply to?

The Framework “applies to federally funded life sciences research involving the procurement of all types of synthetic nucleic acids—including but not limited to DNA and RNA, whether single- or double-stranded, as well as whole organism genomes (eg, viruses, bacteria)—containing any synthetic SOC [sequence of concern]. It also applies to federally funded life sciences research involving the procurement of any benchtop equipment capable of synthesizing nucleic acids.”

Note that **this includes research conducted outside of the US** if that research is supported by US federal funding agencies conducting life sciences research.

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