

July 9, 2026

Andrew Reisig and Joel Savary
Office of Federal Financial Management
Office of Management and Budget
Submitted electronically via www.regulations.gov

Re: Comments of the American Institute of Biological Sciences on the Proposed Rule, *Regulation for Federal Financial Assistance* (Docket OMB-2026-0034), 91 Fed. Reg. 32198 (May 29, 2026)

Dear Mr. Reisig and Mr. Savary:

The American Institute of Biological Sciences (AIBS) submits these comments on the Office of Management and Budget's (OMB) proposed revisions to 2 CFR Part 200, the Uniform Guidance governing federal financial assistance. AIBS is a nonprofit scientific association dedicated to promoting informed decision-making that advances biological research and education for the benefit of science and society. Our members include scientific societies, research institutions, natural history museums, botanic gardens, biological field stations, and universities—organizations whose work depends on the federal grant funding administered under this framework, including tens of billions of dollars annually from the National Science Foundation (NSF), the National Institutes of Health (NIH), and other agencies.

AIBS shares OMB's stated goals of transparency, accountability, and responsible stewardship of taxpayer dollars. We are deeply concerned, however, that this proposed rule, taken as a whole, would cause lasting and largely preventable harm to the U.S. research enterprise—harm that would outlast any single administration. Many of the rule's central provisions are also in direct tension with the administration's own Executive Order on Restoring Gold Standard Science (EO 14303), which calls for science that is reproducible, transparent, collaborative, interdisciplinary, subject to unbiased peer review, and free of conflicts of interest. As detailed below, the proposed rule would undermine each of those tenets: it would replace unbiased expert review with review by political appointees, restrict the international collaboration that is a cornerstone of how science advances, and tie funding to administration priorities that may change at any moment.

Our substantive comments focus on the provisions that most significantly affect federally supported scientific research. We do not address every proposed change, and the absence of comment on any provision should not be interpreted as agreement with it. Each section below is keyed to the relevant provisions of 2 CFR Part 200, with the section number noted in brackets as requested.

1. The Comment Period Is Inadequate and OMB Has Not Analyzed the Rule's Costs

This proposed rule is among the most transformative revisions to the Uniform Guidance since its establishment. It amends 91 parts of Title 2 across hundreds of sections, fully restates a large share of Part 200, and adds dozens of new subsections affecting virtually every stage of the federal award life cycle. A change of this magnitude warrants the careful, multidisciplinary analysis that a 45-day comment period—spanning a single summer—cannot support. Compounding the problem, the rulemaking never appeared on the Unified Agenda, and no EO 12866 meetings were held while it was under interagency review, so affected stakeholders had no advance notice that rulemaking of this scope was underway. A comment period of at least 90 days would have been far more consistent with past practice and appropriate for a rule of this scale and consequence.

Most significantly, OMB's own Regulatory Impact Analysis acknowledges that it was unable to quantify the expected costs or benefits of the rule, and it expressly requests public comment to supply the cost data, operational information, and implementation estimates needed to evaluate the proposal. A rule cannot be meaningfully assessed—by the public or by OMB—when the agency itself concedes the evidentiary record is incomplete. The compliance costs here are real and substantial: institutions will have to redesign subaward structures, expand monitoring and reporting systems, and stand up new approval workflows across dozens of agencies, each of which may interpret the rule differently. OMB should have conducted the cost-benefit analysis that ought to precede—not follow—a proposed rule of this consequence.

2. The Proposed Rule Would Politicize Funding Decisions and Destabilize the Research Enterprise

[§ 200.202, § 200.205, § 200.208]

Read together, these provisions reorient the federal grant system around shifting political priorities rather than scientific merit. § 200.202 would require that program goals and objectives be “aligned with administration policies and priorities.” § 200.205 would insert a pre-issuance review in which senior appointees confirm that applications are “consistent with applicable law, Federal agency priorities, and the national interest,” and that discretionary awards “demonstrably advance the President's policy priorities.” § 200.208 would, in effect, allow agencies to change the governing criteria midstream.

This is a fundamental departure from the framework that has made the United States the world leader in science. For decades, funding decisions have been driven by rigorous, independent peer review that evaluates proposals on scientific merit, feasibility, and public benefit. Layering a political appointee's judgment on top of that process—under undefined standards such as “national interest” and “administration priorities”—invites decisions untethered from scientific quality and subject-matter expertise. Such an approach is also squarely at odds with the Gold Standard Science order's insistence on unbiased peer review

that is free of conflicts of interest. OMB’s expertise and statutory mandate lie in financial management, not in adjudicating scientific merit; that judgment is best left to the expert review processes Congress and the agencies have built.

The harm is not limited to the relatively few awards that might be blocked. The mere existence of a political filter with undefined criteria and no meaningful appeal will reshape what researchers propose and what institutions submit, long before scientific subject matter expert reviewer(s) see an application. Researchers working at the frontiers of biology—where questions touch on public health, environmental change, or human behavior—will have reason to wonder whether their work will survive a political screen, and many will steer toward safer topics. That kind of self-censorship is difficult to measure, nearly impossible to reverse, and corrosive to the independence that gives science its credibility. And because the criteria can change with each administration, the same mechanism could be used to redirect science in any direction at any time—a fragile arrangement that no administration should be comfortable building. AIBS urges OMB to withdraw these provisions and preserve the primacy of independent scientific merit review.

3. Allowing Funding Competitions to Be Exempted from Public Notice Undermines Transparency

[§ 200.204]

Section 200.204 would permit agencies to exempt grant competitions from the ordinary requirement of public notice. This is difficult to reconcile with a rule that OMB describes as advancing transparency and accountability. Public notices of funding opportunities are the foundation of fair, open competition: they ensure that every qualified institution—not only those with the closest ties to an agency—learns of an opportunity and can compete for it on equal terms. Exempting competitions from public notice would shrink the applicant pool; disadvantage smaller institutions, museums, and field stations that lack insider channels; and erode public confidence that awards are made on the merits. AIBS urges OMB to preserve a robust public-notice requirement for funding opportunities.

4. Vague Content-Based Prohibitions Will Chill Legitimate Biological Research

[§ 200.218, § 200.300]

Section 200.218 would prohibit using federal awards for research or activities grounded in “disparate-impact” frameworks, and § 200.300 would impose prohibitions related to “DEI” and “gender ideology.” None of these terms is defined in the proposed rule. That vagueness is itself a serious problem. Biology routinely and legitimately studies variation across populations and the biological and environmental factors that drive differences in health and disease—for example, research on sex differences in physiology and drug response, on environmental exposures that affect some communities more than others, or on the distribution of disease across populations. Researchers and institutions cannot tell whether

such mainstream, peer-reviewed science would be abruptly disallowed by these undefined prohibitions.

Because dozens of agencies must implement these provisions on a compressed timeline, interpretation will vary, and the safest course for a risk-averse institution will be to avoid entire lines of inquiry rather than test the boundaries of an undefined rule. The predictable result is that valuable science goes unproposed and unfunded—a suppressing effect that raises serious academic-freedom and First Amendment concerns and that, again, conflicts with the Gold Standard Science order’s commitment to follow the evidence. At a minimum, OMB must define these terms precisely and narrowly so that they do not reach legitimate scientific inquiry; better still, it should withdraw them.

5. Blanket Restrictions on Foreign Collaboration Will Cede U.S. Scientific Leadership

[§ 200.220, § 200.202(e)]

Section 200.220 would broadly prohibit using federal funds for “covered foreign collaborations,” and § 200.202(e) would require case-by-case justification of any international element of a research award, with foreign entities effectively barred absent political-appointee approval. International collaboration is not peripheral to modern biology—it is central to how science is done and how it advances. Biodiversity research depends on field work, specimen exchange, and partnerships across borders; pandemic preparedness depends on global disease surveillance; ecological and climate research depends on data and sites that span continents. The Gold Standard Science order itself identifies collaboration as a hallmark of rigorous science.

Legitimate national-security concerns about specific foreign entities are real and important, but they are already addressed through targeted, risk-based tools—disclosure requirements, export controls, and research-security policies. A blanket presumption against all international collaboration is poorly tailored to those risks and would impose large collateral costs: it would slow scientific progress, weaken U.S. leadership of global research initiatives, and prompt the world’s best scientists to build their networks elsewhere. AIBS urges OMB to withdraw these provisions and rely instead on the existing, targeted mechanisms for managing genuine foreign-influence risks.

6. Expanded Termination and Suspension Authority Would Cause Irreversible Harm

[§ 200.340]

Section 200.340 would expand agencies’ authority to terminate or suspend active awards when an award is determined not to “effectuate program goals, Federal agency priorities, or the national interest.” “National interest” is undefined, the rule does not specify who makes the determination or by what criteria, and the provision functions in practice as a termination-for-convenience clause tied to political priorities. Federal research operates on a

time horizon that spans administrations; the harm from terminating it midstream is often irreversible.

Consider the concrete consequences. If an administration were to deprioritize, say, Alzheimer's disease research, a long-term study could be terminated years in, after substantial public investment, with no way to recover the lost cohort time. Patients enrolled in active clinical trials would lose access to investigational treatments and the safety monitoring that comes with enrollment—outcomes that cannot be undone and that conflict with the informed-consent framework participants relied upon. A multi-decade ecological dataset interrupted at year 22 would become a permanent gap in the scientific record. Research teams would dissolve, trainees would lose their projects mid-degree, and specialized expertise would leave the field or the country. Stopping research in progress is not savings—it is waste compounded by harm. AIBS urges OMB to restore the established standard under which awards are terminated early only for cause—documented noncompliance, fraud, or failure to perform—and to address changing priorities prospectively through new funding opportunities, with notice, a stated rationale, and an opportunity to respond.

7. Heightened Oversight and the Elimination of Fixed-Amount Subawards Increase Burden

[§ 200.303, § 200.333]

Section 200.303 would heighten scrutiny and compliance obligations across the entire award life cycle—adding requirements around organizational policies, fraud reporting, conflict-of-interest disclosures, and subrecipient monitoring—while § 200.333 would eliminate fixed-amount subawards and move all subawards to a cost-reimbursement basis. OMB presents the rule as reducing burden, but these provisions do the opposite. Fixed-amount subawards are a streamlined, outcome-focused mechanism widely used to support research consortia, multi-institutional networks (such as collaborative specimen-digitization efforts that link dozens of museums and university collections), and pilot projects. Converting them to cost reimbursement imposes detailed financial tracking, invoicing, and audit obligations on every subrecipient.

These costs fall hardest on the smaller institutions, natural history museums, botanic gardens, and field stations that often participate in collaborative biological research as subrecipients and that lack large grants-management offices. The likely effect is to push such partners out of federally funded collaborations altogether—narrowing the research community rather than strengthening accountability. Because OMB has not quantified these compliance costs, the rule proceeds without any analysis of the burden it imposes. AIBS urges OMB to retain fixed-amount subawards and to scale oversight to each recipient's actual, documented risk.

8. New Limits on Advertising, Public Communication, and Civic Activity Are Vague and Overbroad

[§ 200.421, § 200.450]

Section 200.421 would make nearly all advertising and public-relations costs unallowable, and § 200.450 would add new prohibitions on voter-registration activities and on “issue advocacy or public messaging” regarding policy positions “unrelated to the award.” These provisions would significantly constrain how grantees communicate about their work with the public. Communicating taxpayer-funded science to the public is central to the mission of museums and botanic gardens, and an expected part of the work of research institutions — and the Gold Standard Science order's own emphasis on transparency depends on that communication. Restricting the costs of public outreach undercuts the public benefit of the research itself.

The limits on civic activity are especially troubling and especially vague. Many museums and similar institutions regard nonpartisan voter registration as an integral part of their civic and educational mission, and the phrase “issue advocacy or public messaging” is so broad that institutions cannot tell what ordinary public-engagement activities might be swept in—raising clear First Amendment concerns. Because the rule also permits agencies to change the governing criteria at will, institutions cannot reliably plan around these provisions even where they believe their activities are permissible. AIBS urges OMB to withdraw these restrictions and, at a minimum, to define their scope narrowly and expressly protect nonpartisan civic engagement and the public communication of science.

9. Restrictions on Conferences, Memberships, and Publications Impede Dissemination of Science

[§ 200.432, § 200.454, § 200.461]

These provisions would restrict the very activities through which research reaches the world. § 200.432 would require express prior agency approval, written into the award terms, before a grantee may attend a conference. § 200.454 would significantly restrict—and largely disallow—the costs of professional-society memberships, subscriptions, and professional-activity costs. § 200.461 would make publication costs, including article processing charges and open-access fees, unallowable by default. Conferences, memberships, and publications are not ancillary to research; they are how findings are validated, disseminated, and translated into practice, and how researchers stay current in their fields. Restricting them makes science more siloed and less transparent—directly contrary to the reproducibility and transparency the Gold Standard Science order demands.

The default prohibition on publication costs in § 200.461 also creates a direct legal conflict with existing federal open-access policy. Under the 2022 OSTP public-access memorandum, agencies are required to ensure that peer-reviewed publications resulting from federal funding are made freely and immediately available—an obligation grantees typically satisfy by paying open-access fees. OMB cannot simultaneously require open access and defund the

primary means of achieving it; the proposed rule offers no way to reconcile the two. Moreover, requiring prior approval for conferences, memberships, and publications—under criteria the agency may change at will—means grantees cannot rely on being able to disseminate their results, and the burden falls disproportionately on smaller and less-resourced institutions. AIBS urges OMB to withdraw these provisions, retain current allowance for conference, membership, and publication costs, and at a minimum confirm that publication costs necessary to satisfy a federal open-access mandate remain allowable.

Conclusion

AIBS supports genuine efforts to strengthen transparency, accountability, and stewardship of federal research funds. But the proposed rule, as written, would replace the foundations of a research system that is the envy of the world—independent merit review, stable multi-year support, open international collaboration, and the free dissemination of results—with vague, shifting, politically driven standards that contradict the administration’s own Gold Standard Science order, increase burden on researchers and institutions, and threaten American scientific leadership at a moment of intense global competition. OMB has not analyzed the rule’s costs, has defined few of its key terms, and has allowed too little time for the public to address its many provisions.

For these reasons, AIBS urges OMB to abandon the rule in its current form. We further urge OMB to approach any future major revisions to federal grantmaking policies with appropriate stakeholder consultation and the cost-benefit and operational analyses that should precede a rule of this consequence, and to allow a comment period commensurate with its scope. We welcome the opportunity to work constructively with OMB toward reforms that strengthen accountability while preserving the scientific excellence on which the nation’s health, security, and prosperity depend.

Respectfully submitted,

Scott Glisson
Chief Executive Officer
American Institute of Biological Sciences