

Jul 13, 2026

Andrew Reisig & Joel Savary  
Office of Federal Financial Management  
Office of Management and Budget (OMB)  
725 17th St Northwest  
Washington, DC 20503

Re: Public Comment on OMB-2026-0034

*Via electronic filing (<MBX.OMB.Grants@OMB.eop.gov >, <  
<https://www.federalregister.gov/documents/2026/05/29/2026-10817/regulation-for-federal-financial-assistance>>)*

Dear Mr. Reisig and Mr. Savary,

As scientists and research librarians who study the role of science in society, and how scientific information is produced and communicated, we are deeply concerned about the proposed rules. We are not legal scholars, and do not offer a detailed expert analysis of the regulatory language and landscape. This comment reflects our considered opinion of the likely broad consequences of the proposed changes, based on our expertise in our subject areas.

Given the breadth and complexity of the proposed revisions, and the short period given to provide comments, we focus our comments on three overarching issues: politicizing the grantmaking process; chilling speech; and impairing research communication.

### **Politicizing the Grantmaking Process**

The changes proposed in 2 *CFR* § 200.205 (Merit Review), §200.204 (Notice of Funding Activities) and § 200.340 (Termination and Suspension) politicize the process of making grants, and subject grant-funded projects to continuous political influence.

Generally, the current processes for awarding grants are designed to be transparent and meritocratic: Information about competition budgets, goals, process, and criteria for entry and awards are public, and announced in advance. The criteria for proposal entry and proposal evaluation are impartial and clearly stated in advance. Records of proposal and evaluation are systematically retained to support public audit and accountability. Further, for most scientific competitions, the process follows an even more stringent process of "peer-review" in which disinterested external experts are engaged to evaluate how each proposal addresses the stated program goals.

The proposal (in § 200.205) would fundamentally alter this: Competitions would no longer have to be open and public (200.204), and awards decisions will be made by groups of "senior political appointees" who are forbidden from "routinely defer[ing]" to peer review, and required

to ensure that each award "advance[s] the President's policy priorities"<sup>1</sup>. Furthermore, neither explanation nor record-keeping is required for these decisions. Finally, section (§ 200.340) effectively subjects every grant-funded project to continual political influence by giving political appointees the ability to cancel ongoing awards at any time. Taken together, the proposed changes will transform the system for allocating grant funds from a transparent, merit-based process to a political process, dictated by political appointees operating out of the public eye.

## **Chilling Speech**

The changes proposed in 2 *CFR* § 200.206 (Federal agency review of risk posed by applicants), §200.450 (Lobbying), and § 200.332 (Requirements for Pass-through Entities) aim to pressure awardees not to express individual political views.

It is the responsibility of scientists to systematically and dispassionately apply rigorous standards in their scientific research. And all participants in a democracy have the right to vigorously express their individual political opinions. The current system imposes professional conduct on scientists when acting from authority, such as while conducting a review, or conducting research on human subjects -- while retaining the recognized distinction between speaking from authority and speaking one's mind in the political and social spheres.

In contrast, the proposed changes to 2 *CFR* § 200.206 direct agencies to scrutinize applicants' professional affiliations and extracurricular activities, for undefined risks, within a review system that would be fundamentally politicized (see previous section). Further, awardees who survive the political vetting process would be prohibited under "issue advocacy" (200.450) from communicating findings or conducting education that could be perceived as having political implications -- with the "reputational harm provisions" in § 200.332 providing a mechanism to cancel the award, or portions of it, if an agency's political oversight is displeased by a grant's findings, or how they are communicated.

## **Impairing Research Communication**

The changes proposed in § 200.432 (*Conferences*), § 200.454 (*Memberships and Subscriptions*), and § 200.461 (*Publication Costs*) will reduce dissemination and communication of research.

The proposed changes generally disallow the use of federal grant funding for conferences, professional organizations, or journal publication and reading costs. This essentially withdraws federal support for all of the customary channels for critiquing, evaluating (e.g., peer review), and disseminating research. As a partial rationale, OMB asserts (200.461) that "Publication costs

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<sup>1</sup> The proposed changes to §200.205 also repeatedly refer to "gold standard science" as an additional basis for additional requirements. However the determination over which research is "gold standard science" is also made by political appointees.

are not inherently necessary to carry out the core programmatic objectives of most Federal awards."

The OMB's rationale is wrong, and its proposed changes will harm both science and society. Science is by nature a collective activity that depends on examining, criticizing, validating, and building on others' work. Science cannot progress without transparency, publication, and collaboration. Further, making scientific results and methods broadly and freely available not only enables the scientific community to progress, but also creates transparency necessary to establish the trustworthiness of research findings for the public, and to maximize the public benefit from research.

## **Summary**

It is the prerogative of the democratic political process to determine which questions society will invest in answering, and which problems it will pay to solve. However, it is wrong to prohibit awardees from expressing political opinions. And it is corrupt (or, at least, foolish) to pay for the answers that one wishes to hear, collect only data that favors a preferred conclusion, or evaluate proposed solutions based on the politics of the proposers. An open, transparent, and meritocratic process of grant evaluation remains the best way to seek answers to the problems society has democratically chosen to address

The proposed rule is fatally flawed in both design and implementation. Adopting the rule will not serve the stated goals of improving transparency, accountability, and oversight; clarifying regulation; and reducing award recipient burden. To the contrary -- adopting the rule would undermine transparency, politicize oversight, create broad areas of uncertainty, and pose an enormous burden for awardees. Moreover, adoption of the rule will severely damage the integrity of the entire Federal award system, violate the rights of awardees to express political views, substantially impair scientific research and higher education, restrict innovation, and threaten the competitiveness of the United States.

We strongly urge OMB not to finalize this rule.

Sincerely,

Micah Altman, Research Scientist, MIT

Chris Bourg, Director, MIT Libraries

Philip N. Cohen, Professor of Sociology, University of Maryland