



July 13, 2026

Submitted electronically via www.regulations.gov

The Honorable Russell T. Vought
Director, Office of Management and Budget
Executive Office of the President
725 17th Street NW
Washington, DC 20503

Re: Proposed Rule, Regulation for Federal Financial Assistance (Docket No. OMB-2026-0034)

The Consortium of Social Science Associations (COSSA) appreciates the opportunity to comment on the proposed rule published in the Federal Register, May 29, 2026, Regulation for Federal Financial Assistance (OMB-2026-0034).

According to the preamble, the goals of the proposed revision to 2 CFR (or Uniform Guidance) are to improve transparency, accountability, and oversight of federal funding while reducing administrative burden and ensuring responsible stewardship of taxpayer resources. COSSA supports these goals as an important function of the federal government. Unfortunately, several provisions within the proposed rule would not have the intended effect. In fact, many of the proposed changes, if implemented, have the potential to increase administrative burden, create uncertainty in the federally funded research system, reduce transparency, and irreparably damage the U.S. scientific enterprise and our leadership on the global stage. In addition, if implemented the rule would undo decades of legislation and regulatory reforms that have been thoughtfully deliberated in cooperation with the research community. **Therefore, COSSA strongly urges OMB to withdraw the rule and to engage with the research and other communities that rely on federal financial assistance to rethink ways 2 CFR may need to be changed, enhanced, or modernized.**

§ 200.205 | Federal Agency Review of Merit Proposals

The proposed rule would add an additional layer of pre-issuance, political review to federal funding decisions. It would instruct federal agencies to ensure, prior to award, that the project is “consistent with applicable law, federal agency priorities, and the *national interest*.” However, the criteria included in the rule for making these determinations raise several concerns.

First, this section of the proposed rule contains several ambiguous terms (e.g., “national interest”) that make it impossible to anticipate how they would be applied, especially with respect to scientific research funding. For example, the rule does not define what it means for an award to “*demonstrably advance the President’s policy priorities*.” Instead, the rule includes four principles for agencies to follow when making funding decisions. However, these principles, which would determine the difference between a funded and unfunded project, are not authorized under federal law. Following these principles as stated in the proposed rule would significantly *reduce transparency* into the process for determining federal research funding.

Since World War II, the United States' research enterprise has been guided by the promise of science, allowing those with subject area expertise to help guide how the country best invests in research. Countless scientific advances in the intervening years that were funded (at least in part) by taxpayer dollars, likely were not explicitly tied to an Administration's stated policy priorities. Their selection for federal funding was determined by scientific need, peer review, competition, and financial capacity. Adding a requirement that all federal research grants "demonstrably advance the President's policy priorities" would fundamentally change the way research is supported in the U.S. and, perhaps unintentionally, lead to entire areas of research not being supported. The nature of basic science is to explore fundamental questions that may not have an immediate application—and may not be tied to a specific Presidential policy—but that contribute to the scaffolding of knowledge that builds and progresses over time. This must be preserved.

Second, the proposed rule would give the authority to make the determinations discussed above to a political appointee within the agency (or their designee). One concern is the likelihood that not all political appointees holding this expanded power will have the necessary subject matter expertise needed to make informed decisions about research projects deserving federal support. Instead, they would be tasked with determining whether grant proposals are aligned with the political and ideological priorities of the Administration. Further, the proposed rule specifically states that these political appointees may ignore the outputs of the peer review process, essentially providing them with veto power over scientific research that conflicts with an Administration's ideology. The peer review process (also referred to as merit review) has served the research community for decades and is considered the gold standard for objective review by experts in the appropriate fields. *Sidestepping this process would further reduce transparency into federal funding decisions and degrade public trust in science.*

Finally, this section would prohibit federal funding for activities related to DEI, gender, or "Anti-American Values," another term that is not defined in the rule. If implemented, the rule would threaten programs previously established by Congress that seek to address longstanding racial, social, or other disparities and underserved communities. The usage of vague terminology, again, does not allow for transparency and could give the Administration unlimited discretion to eliminate programs it disfavors, regardless of Congressional direction or intent.

§ 200.202 | Program Planning and Design

The proposed rule would require federal agencies to design programs that "align with administration policies and priorities." While new Administrations certainly have the prerogative of developing and promoting new initiatives and activities that are priorities for them, Administrations cannot legally create new programmatic requirements beyond those authorized and appropriated by Congress.

In addition, the proposed rule would limit international collaborations. We agree with the need to prioritize national security and research security. However, the priority placed on "domestic-first" would increase administrative burden for those working on programs with international partners by requiring that the collaboration be approved in advance by a senior political appointee.

§ 200.218 | Prohibition of Using Federal Awards to Promote or Support Theories of Disparate-Impact Liability

This section proposes a new policy to prohibit funding for activities that "impose disparate-impact liability based on federally protected characteristics such as race, sex, or age," including disparate-impact studies, litigation, or other activities that aim to mitigate systemic disparities. If implemented, this provision could

negatively impact important research areas, such as education or health research studying diverse populations or comparative studies among differing socioeconomic circumstances.

§ 200.220 | Prohibition of Using Federal Funds for Covered Foreign Collaborations

This section would prohibit the use of federal funding for research, technical assistance, data-sharing, or travel with “covered foreign countries” unless authorized by federal statute or a federal agency head. However, as written the proposal could be broadly interpreted to prevent any international collaborations without express approval, making U.S. science less competitive globally.

§ 200.300 | Statutory and National Policy Requirements

This section would prohibit the use of taxpayer dollars to “fund, promote, encourage, subsidize, or facilitate” DEI and “gender ideology” policies. Once again, the rule does not provide formal definitions of “*diversity, equity, and inclusion* (DEI)” or “*diversity, equity, inclusion, and accessibility* (DEIA).” If implemented, this proposal could threaten federal programs created by Congress that seek to address racial, social, or other disparities and underserved communities.

§ 200. 340 | Termination and Suspension

The proposed rule would significantly broaden the federal government’s ability to terminate or suspend discretionary grant funding “for convenience” if the award “does not effectuate program goals, federal agency priorities, or the *national interest* as they exist at the time of the termination.” If implemented, this section would have major destabilizing effects on the research community, making it difficult to plan for and administer federal awards. For example, grantees may lose funding after already making investments in personnel or infrastructure.

The Uniform Guidance already provides federal agencies with the ability to terminate discretionary awards if they “no longer effectuate the program goals or agency priorities.” Again, adding the ambiguous term “*national interest*” to the authority would mean that awards could be terminated *without cause* if the Administration’s priorities shift and allow new Administrations to terminate awards made under their predecessors. See the commentary to § 200.205 above for additional reasons why broadening this authority would be detrimental to the U.S. scientific enterprise.

§ 200.432 | Conferences

§ 200.454 | Memberships, Subscriptions and Professional Activity Costs

§ 200.461 | Publication and Printing Costs

Restrictions on the use of federal funds for conference attendance, scientific publications, and journal subscriptions hinder the ability of researchers to disseminate their findings, learn about advances in their fields, and establish important connections and research collaborations. The exception for prior approval at the time the award is issued would increase administrative burden by requiring grantees to determine in advance (often years in advance for multiyear awards) which scientific conferences would be appropriate for sharing their findings and anticipating plans for publishing their results, both of which are unknown at the time of award. These restrictions would be especially harmful to early career researchers who depend on scientific conferences and access to the scientific literature to advance their careers. These costs should be maintained as allowable by default in the final rule.

Undefined and Ambiguous Terminology

The proposed rule includes several undefined, ambiguous terms that would be used in funding determinations. Among them include, but are not limited to:

- “National interest” (§ 200.205)
- “Anti-American values” (§ 200.205)
- “Demonstrably advances the President’s policy priorities” (§ 200.205)
- “Gold Standard Science” (§ 200.205)
- “DEI” or DEIA” (§ 200.205, § 200.300)
- “Issue advocacy” (§ 200.450)
- “Public messaging” (§ 200.450)

Using ambiguous terms as metrics in funding decisions provides uncertainty and further reduces transparency as it is not clear to the public how such terms are being defined and applied.

Conclusion

COSSA appreciates the opportunity to comment on the proposed rule. As noted, the rule as currently drafted fails to meet its stated goals of improving transparency, accountability, and stewardship of federal funds and reducing administrative burden. Instead, it would create significant uncertainty and instability in the federal funding system, especially for research funding, increase administrative burden for grantees and federal agencies, reduce transparency into funding and termination decisions, and disincentivize important collaborations and dissemination of research findings.

The sheer scope and breadth of regulations and policies addressed in the proposed rule call for OMB to employ a far more deliberative process with the stakeholder community. The 45-day comment period and October 1, 2026 implementation date do not adequately reflect the scale of the changes being proposed. Additional stakeholder engagement is warranted before finalizing a rule as far-reaching and consequential as this one.

Thank you again for the opportunity to express these concerns. You can contact COSSA by emailing wnaus@coffa.org.