



Regulation for Federal Financial Assistance

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Dear Mr. Vought:

Thank you for the opportunity to comment on Proposed Rule: Regulation for Federal Financial Assistance (OMB-2026-0034; FR Doc. 2026-10817). These changes to government-wide grant policies would have profound consequences for the entire university research enterprise -ranging from training doctoral students to producing high-quality basic science. With these changes we would have fewer scientists and lose our place in the global competition for scientific advancement. Without enough scientists or a robust scientific infrastructure, the American people will suffer. As a result, I **advise against the proposed changes**.

I write in my capacity as a sociologist who studies the American family and gender politics in the United States. I spent twenty years at North Carolina State University before relocating to the University of Illinois at Chicago as the Head of the Sociology Department. I served for a decade as Department Head, and remained on the faculty for another decade after that. I regularly taught courses in methodology, sociology of gender, sociology of the family, and theory. While retired now, I am still writing articles from the data gathered during my last NSF grant. I also serve on the National Chapter Advisory Board of the Scholars Strategy Network.

I have received several scientific grants from the National Science Foundation (NSF), the National Council on Soviet and East European Research, the Knight Foundation, and the Rockefeller Foundation. The NSF grants focused on basic research. In one project, we tested several theories for the effect of women's economic independence on marriage. In the more recent NSF grant, we studied the implications of changing gender norms on social identities of youth in the 21st Century. I can assure you that while both studies focused on issues of gender, neither was driven by- or riddled with- ideological bias. In both cases, we were studying these topics because they impact Americans' pursuit of happiness in their personal lives. . Social scientific research on gender, as well as other topics, is not "ideology" but designed to test theories about human society. I have devoted forty years of my career to doing just that. We must continue to do social scientific research to understand the impact of gender on Americans' lives and how organizations support or discourage people of all sorts, by region, race, religion and gender, to succeed, or not.

My comments raise several justifications for why I advise against the proposed changes. First, I comment on the proposals to exclude certain types of research from funding altogether, which would prevent critical social science research. Second, I comment on the politicization of research funding, criticizing the proposal that would allow political appointees- instead of scientists- to judge the quality of science to be funded, stifling scientific innovation. Third, I critique the proposals that will make a scientific career burdensome, and decrease the quality of the scientific workplace, driving scientists out of the academy, and perhaps out of the country.

Sections 200.218 and 200.300 Will Prohibit the Funding of Essential Social Science Research

First, and most troubling, is that §§200.218 and 200.300 would prohibit entire fields of social science research from any funding. We cannot retain our status as the premier scientific researchers in the world if we prohibit research into public health, social life, inequality, and diversity. Human societies are diverse, and various public policies and private organizations may advantage one group by design or inadvertently. We cannot know the effects of organizational decisions without research. My own field, sociology of gender, would be cut off from support. Social scientists who study gender do not impose any “ideology” on the research; we try to understand what creates and decreases inequality. We test theories about human behavior that will help us understand gender and other aspects of human activity.

The scientific study of gendered behavior in marriage- research that could not occur if the proposed rule goes into effect- has provided consistent new information that not only informs married couples about their choices but also teaches us about the rate of social change. Basic social scientific findings are often generalizable beyond the actual area of the research. By denying funding, these proposed changes would weaken, if not destroy, much of the social science infrastructure in this country. This cedes global dominance to other countries.

The Proposed Revisions to Section 200.205 Politicize Research Funding and Harm Scientific Innovation

Second, and closely related to the first, is the replacement of peer review by political oversight for the decision to fund scientific research. What makes American science great is the freedom to innovate, the quintessential American freedom from stifling state censorship. Under the proposed revisions to §200.205, political appointees would have final say over which research gets funded. Every grant would need sign-off from a political appointee, and the rule says that recommendations from scientific peer reviewers are “advisory” only and should not be “routinely deferred to.” Peer review may be imperfect, but it is the very best method we have for ensuring that scientific experts decide what proposals are valid empirical projects and which are redundant, unnecessary, or simply badly designed. To allow political appointees to decide on scientific research inherently politicizes it. This proposal will stifle science and lead to brain drain. Scientists who have options will flee to countries that allow free scientific thought, fund the best ideas, and not the ruling elites' pet projects. .

The Proposed Rule Will Drive Scientists Away and Erode Scientific Research

Last, but still vital, many of the proposals simply make the bureaucracy of running a big grant nearly impossible, and so will deter researchers from even seeking federal funding. The proposed revisions to §200.340 suggest that once granted, research studies can be canceled at any time. The government can pull the plug on an ongoing study whenever it decides the work no longer fits its current priorities, even if nothing has gone wrong and the science is on track. Agencies would be required to include this cancellation right in every grant. This creates uncertainty in any grant-funded job. No scientist funded by the federal government could assure their employees, from graduate assistants to post-doctoral researchers, that they would get paid from month to month. Such insecurity would destroy any organization, public or private. Businesses fail

when their employees do not get paid or have a good reason to worry that they might be without pay to cover their mortgage at any given moment. Why would anyone take such a job? And even if they do keep their jobs, the proposed revisions to §200.454 mean they could lose access to the scientific literature. Subscriptions to scientific journals would require governmental approval if paid for with federal funds.

Even worse, the proposed revisions to §200.432 deprive scientists the flexibility to attend any conference that was organized after the grant was submitted, because they would only be allowed to attend those specific conferences requested within the original grant application. American scientists will be shut out of international conferences that are called when new and exciting breakthroughs are happening, because those conferences hadn't been planned years in advance. Because of this, the best and the brightest scientists will avoid working for American institutions that are funded with federal research dollars. These proposals seem designed to decrease the quality of scientific careers, and I have already seen evidence of that happening, as my last cohort of doctoral students has all decided to apply only for non-academic jobs. The perceived attack on higher education is already weakening our team of young, talented scientists willing to do basic research. These proposals will further the brain drain from universities and decrease the quality of our scientific endeavors.

The Proposed Rule Will Erode Public Trust in the Government and in Science

The goal of increasing scientific knowledge, including the knowledge about human society, should be at the core of every regulation of science. We need the highest quality science possible to solve the world's problems, and for that, we need experts deciding what research is high enough quality to fund. We also need funding streams that are stable and provide infrastructure for universities, as well as direct costs for scientists, including social scientists. The proposed changes, however, represent a dangerous departure from the meritocratic system that has made American science the best in the world. By politicizing decision-making about scientific research, these proposals, if enacted, will erode public trust in both the government and in science. I urge you to reject these proposals.

Sincerely,

Barbara J Risman, Ph.D.