



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 sweeping effects for research and development conducted in the United States, and in turn, the economy and all Americans. **I am writing in opposition to the proposed rule.**

I am a Professor, Department Chair, and Associate Dean of Research at American University's School of Public Affairs in Washington, DC. *The views expressed here are my own and do not represent the position of American University.* As a researcher and academic, it is clear to me that **the proposed rule would have a severe, negative impact on the quality and quantity of rigorous science produced in the United States, with lasting, harmful impacts on Americans' quality of life, American global competitiveness, and the economy as a whole.**

For the reasons detailed in the comments that follow, the Department should immediately withdraw its current proposal. This would leave the current peer-reviewed processes in effect.

Comments

Together, American innovation combined with public investments in research through the competitive and rigorous peer review system has been extremely successful in extending and improving American's lives. To date, the system has produced an incredible scope and number of successes in merely the last century alone—from cancer drugs to the video camera to the internet to solar panels to the COVID-19 vaccine.

Public investment in research leads to technological progress and directly boosts GDP by increasing worker productivity, worker wages, and returns on investment. A 2025 report from colleagues at American University discusses the macroeconomic impact of cuts to public research funding: they estimate that a 25% reduction in scientific funding would have short- and long-term negative consequences for the economy and for Americans' financial well-being, reducing tax revenue by 4.3% annually and reducing GDP by about 3.8% in the long run (25-30 years).

This proposal would alter the time-proven system in ways that would damage its ability to support cutting edge science. This sweeping proposal would affect the Uniform Guidance (2 CFR Part 200), which governs grants across virtually all federal research agencies, including NIH, NSF, DOE, NASA, DOD, USDA, and others.

Specific Concerns:

The proposed rule would threaten the independence, stability, and scope of scientific research, reducing the scientific questions investigated – limiting the scientific knowledge generated as a result:

§200.205: Political appointees—not peers with expertise in the science, as the current system is designed—would have final say over which research gets funded. The rule states that recommendations from scientific peer reviewers are “advisory” only and should not be “routinely deferred to.” Awards would need to be consistent with administration policy priorities and the “national interest” as defined by the executive branch. This is the most consequential and problematic change because it shifts final decision-making authority away from subject-matter experts and toward political leadership. This process also creates uncertainty and instability for research areas that become politically controversial as interests and political appointees change. It also limits the scope of science to political priorities, instead of what science should be limited to: feasibility and the bounds of knowledge.

§200.340: Agencies would be required to include this cancellation right in every grant, and active research studies could be canceled at any time. Federal agencies would receive broader authority to terminate awards that no longer align with agency priorities. For researchers, that means funding stability could become less predictable even after a grant is awarded. This has implications for staffing, equipment, and planning the time horizon for studies and experiments.

§ 200.218: The proposal incorporates provisions implementing executive orders related to “diversity, equity, and inclusion” (DEI) and related topics. The definitions and implications of how DEI is interpreted would effectively prohibit federal funding toward categories of research that examine unintentional discrimination and illuminate disparities in outcomes. This includes barring funding toward much crucial public health and social science research, such as research examining the unequal distribution of climate hazards, air quality, and disaster vulnerability, among other topics. The result would limit our bounds of knowledge rather than expand them.

§ 200.300: The rule would restrict any work the administration deems to involve DEI practices or what it terms “gender ideology.” Women have been excluded from medical studies historically; this would likely exacerbate that problem. Again, this would limit the scope of the research questions researchers investigate and in turn the knowledge we generate in the scientific enterprise. This would harm women’s health if women or research questions specific to women’s health are further excluded from medical and scientific research.

Scientific peer-reviewed journals and conferences are the main ways researchers communicate research findings to each other and to the world. The proposed rule would limit and add administrative burdens to this information sharing:

§200.454: Subscriptions to the journals researchers need to stay current in their field would require specific prior government approval to be paid for with grant funds. This could result in researchers losing access to the scientific literature that drives their own research questions and interpretation of findings.

§200.461: The costs of publishing in scientific journals would no longer be covered by grant funding unless a specific contract requires it or the agency approves it one case at a time. This means that publishing research findings in scientific journals that operate by these types of fees would become harder to pay for and conflicts with the federal Open Access mandate in effect.

§200.432: Attending scientific conferences would require advance government permission. Researchers could only use grant funds to attend a conference if that specific conference was approved and written into their grant from the start, meaning that investigators could not use funds to attend a meeting that was scheduled after the grant was awarded. This could limit the ability of scientists to gather to interpret a surprising result or scientific development.

The proposed rule adds new review, reporting, oversight, and risk-assessment requirements. Universities may need more administrative infrastructure to manage awards, subawards, and compliance activities. As it is, researchers spend too much time – an estimated 42% of their time – on administrative tasks such as grant applications and reporting, when they could be devoting that time to scientific discovery.

Conclusion

Our tax dollars should prioritize investments that truly grow our future and our economy, including supporting cutting-edge, rigorous research as reviewed and determined by scientific peers that can generate results that improve the human condition. **I urge the Administration to rescind this proposal and continue the time-proven, successful process of peer review.** Thank you for the opportunity to comment on this regulation.

Sincerely,

Taryn W. Morrissey, Ph.D.

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