



# **OMB Proposes Rule: Sweeping Changes to Federal Grants**

**Public Comments due July 13, 2026**

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American Institute for Medical and Biological Engineering  
(AIMBE)

# OMB Proposed Rule

The Office of Management and Budget (OMB) has proposed [significant changes](#) to the rules that govern federal grants across all agencies of the government, including NIH, and NSF. These rules would undermine the scientific, merit-based peer-review system in favor of political priorities.

The proposed regulations are open for public comment, and we encourage the AIMBE community to submit personal messages sharing their concerns. Public comments are due by **July 13, 2026**.

# OMB Proposed Changes to the Federal Grant Lifecycle

## Grant Competitions

### POLITICAL ALIGNMENT

Every grant program must align with the President's priorities



### GRANT TIMELINES

Multi-year funding is prioritized



## Grant Application & Review

### POLITICAL REVIEW

Political appointees must approve grants



### UNCLEAR GUIDELINES

Grants must comply with an undefined "Gold Standard Science"



### Peer Review



PEER REVIEW

Peer review is reduced to advisory status and is no longer binding

Dismantles the primary measure of scientific merit

## Research and Dissemination

### GRANT SPENDING RESTRICTIONS

Researchers cannot:

- Attend conferences
- Join professional societies
- Subscribe to journals

(without agency pre-approval)

### PUBLISHING BAN

Publication costs are unallowable, limiting researchers from sharing findings

No publishing without agency pre-approval

### Grant Termination



Grants can be terminated at any time, even mid-award, for any reason



# How do I submit a comment?

AIMBE has partnered with the American Physical Society (APS) to provide a simple tool to help you submit comments about the proposed OMB rule. The tool is a comment builder that allows you to address specific areas of the proposed rule, including:

- Grant review and the politicization of science
- International collaborations
- Professional activities and extracurricular affiliations
- Broadening participation and workforce development

<https://aimbe.org/advocate/omb-proposed-rule-resources/>

# Submitting your Comment



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[Home](#) > [APS initiatives](#) > [Advocate and amplify](#) > [Science policy and advocacy](#) > Comment on OMB proposed rule for federal financial assistance

## Comment on Office of Management and Budget proposed rule for federal financial assistance

Make your voice heard on the Office of Management and Budget's proposed federal grant funding changes and defend the scientific community from this existential threat.

<https://aimbe.org/advocate/omb-proposed-rule-resources/>

# Submitting your Comment



## Professional activities and extracurricular affiliations

**Relevant sections:** 2 CFR § 200.432 (Conferences), § 200.454 (Memberships and Subscriptions), § 200.461 (Publication Costs), § 200.206 (Risk Assessment), and § 200.450 (Issue Advocacy)

- **Conferences and professional memberships:** Conference costs are unallowable unless explicitly written into the grant's terms (§ 200.432). Professional society membership costs require prior written approval, are only allowable if necessary to fulfill the award requirements, and are banned entirely if the organization's primary function is issue advocacy (§ 200.454).
- **Publication and subscription costs:** Limits researchers' ability to widely disseminate research results by generally making publication costs – including page charges, article processing charges and open access fees – unallowable under Federal awards (grants). Exceptions require advanced approval by the agency on a case-by-case basis or specifically required by Federal statute (§ 200.461).

Potentially limits researchers' ability to access the scientific record by making subscription costs unallowable (§ 200.454).

- **Vetting and autonomy:** Broadens pre-award risk assessments to scrutinize applicants' professional and extracurricular affiliations (§ 200.206).
- **Public and civic engagement:** Bans "issue advocacy" on politically sensitive topics labeled by the preamble as "divisive ideologies" (§ 200.450).

Comment on professional activities and extracurricular affiliations



## Broadening participation and students, scientists, and workforce development

**Relevant sections:** 2 CFR § 200.300 (Statutory and national policy requirements) and § 200.218 (Disparate-impact liability)

- **DEI ban:** Blocks federal funds from supporting or promoting Diversity, Equity, and Inclusion (DEI/DEIA) initiatives that are perceived to conflict with applicable Federal anti-discrimination laws (§ 200.300). Lawful, established efforts to increase participation in science may be put at risk of elimination.
- **Disparate-impact restrictions:** Bans the use of federal funds for disparate-impact studies, related litigation, or operational policies aimed at mitigating systemic disparities (§ 200.218), severely limiting topics like education research.
- **"Gender ideology":** Federal funds may not be used to promote "gender ideology" as defined in Executive Order 14168 (e.g. denying "the biological reality of sex or the sex binary in humans" or endorsing or advocating for "the notion that sex is a chosen or mutable characteristic").

Comment on broadening participation and students, scientists, and workforce development



## Grant review and the politicization of science

**Relevant sections:** 2 CFR § 200.205 (Merit Review) and § 200.340 (Termination and Suspension)

- **Political oversight:** Establishes a centralized "pre-issuance review" where federal agency heads must designate senior political appointees to independently review discretionary award proposals to ensure they align with federal law, presidential priorities, and specific national criteria like scientific rigor and public safety. These officials must exercise independent judgment rather than routinely deferring to peer reviews, and agencies retain the discretion to repost funding opportunities if proposals do not meet these standards (§ 200.205). Awards must "...demonstrably advance the President's policy priorities," giving political appointees a veto over any science that conflicts with an administration's ideology.
- **Sudden defunding risk:** Introduces contract-style "convenience terminations" allowing agencies to suspend or terminate active grants at any point if a project no longer aligns with perceived federal priorities (§ 200.340). The agency would not be required to provide a detailed analysis of why the grant was terminated.

Comment on grant review and the politicization of science



## International collaborations

**Relevant sections:** 2 CFR § 200.202(e) (Research Eligibility) and § 200.220 (Covered Foreign Collaborations)

- **Blanket foreign restrictions:** Extends rigid restrictions like the Wolf Amendment — which prevents bilateral NASA collaboration with China — government-wide. For bilateral and multilateral collaboration, prohibits spending federal funds on direct programmatic activities, research, technical assistance, data-sharing, travel, or indirect costs with "covered foreign countries" or other foreign entities unless expressly authorized by federal statute or federal agency head (§ 200.220).

Covered foreign country means any country designated by statute, Executive Order or other Federal law as a foreign adversary, a country of particular concern, or a country subject to sanctions or restrictions related to national security, defense, or intelligence activities. **Broad interpretations of this section could prevent international collaborations without express approval.**

- **"Domestic-first" restraints:** Generally restricts R&D awards to U.S. entities (§ 200.202(e)). Exceptions for international program elements may be included only when authorized by federal statute or approval by a senior political appointee. U.S. researchers could therefore be isolated from global projects like CERN through additional bureaucratic red tape.

Comment on international collaborations



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## Professional activities and extracurricular affiliations

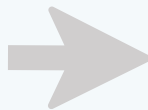
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Comment on professional activities and extracurricular affiliations



## Add Your Comment: Protect the Grant Review Process

Unique, substantive comments are the most effective tactic to impede this rule right now. They force OMB to respond and lay the ground for future congressional or judicial action.

- Introduce yourself and your relationship to the topic.
- Give specific examples and describe concrete impacts.
- Reference the section numbers where relevant within your comment. (Section numbers will be automatically bracketed at the top of your comment to meet submission requirements.)
- You do not need to answer every question; only answer those relevant to you.

You will have a chance to view your full comment and edit it. Clicking "Send" will submit your comment to regulations.gov.

**In a complete sentence, introduce yourself and your career stage or field of study.**

**For example: I am an assistant professor in statistical physics.**

1/4 < >  
Answers will be used to generate a reviewable letter

Next

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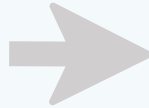
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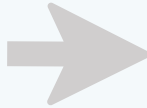
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**How might your grants have been/would be impacted if political appointees have the authority to override peer review?  
Section 200.205**

2/4



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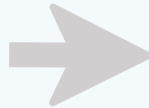
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**How might your past or present research be impacted if active grants can be terminated at any time for political reasons?  
Section 200.340**

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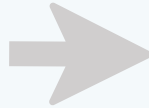
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**In two to three sentences, summarize your concerns about the impact of this rule on the integrity of grant processes.**

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**Create  
Message**



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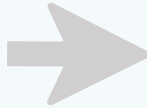
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Clicking "Send" will submit your comment to regulations.gov.

[200.205, 200.340]

To Whom it May Concern |

I am writing in my personal capacity to oppose the proposed revisions to sections 200.205 and 200.340 that would undermine the integrity of federal grant review processes and federal

First Name \*

Last Name \*

Email \*

What professional societies are you a member of?

I would like to receive APS policy updates

Send



# Submitting your Comment

## Additional comments on the rule

You may also submit comments on other aspects of the proposed rule changes.

Use our tool to submit additional comments →

## Additional resources and context

You can see the full rule on the [federal register](#). You may also submit a comment anonymously on the federal register website, using our comment builder to draft and then copy/paste your finished comment, if desired.

### Federal register: Regulation for Federal Financial Assistance

View the full, proposed rule changes on the federal register site.

Review the full rule changes →

### Make your voice count. File your public comment by July 13.

The proposed rule would let political preference override expert peer review, restrict international collaboration, reach into the work of running your lab, and weaken the programs that train the next generation of scientists.

Read APS leaders' call to action →

# Tips for Submitting Comments

To use this tool effectively, or to submit comments on your own through regulations.gov, please consider the following:

- Your comments will be made public and will be part of the public record
- Use constructive arguments and language, avoiding any sensitive or inflammatory themes
- Use evidence to support your claims
- Provide personal examples of how the rule would impact your research
- Address specific areas of the proposed rule, citing the sub-item number associated, for each section of your comments (the comment tool provides this feature automatically)

# AIMBE Public Messaging Tools: Share with your communities

“

Studies of new therapies should not have to clear political review while our relatives wait for new dementia treatments.

”

**OPPOSE THE PROPOSED OMB RULE CHANGES**



“

The treatment that could save your life tomorrow may be sitting in a lab today, waiting for federal funding. **Policies that slow medical research slow the discovery of cures.**

”

**OPPOSE THE PROPOSED OMB RULE CHANGES**



“

When a child is diagnosed with a rare disease, their family's hope often rests on federally funded research. **These proposed changes would let political appointees — not pediatric specialists — decide which studies are worth pursuing.** No parent should have to live with that.

”

**OPPOSE THE PROPOSED OMB RULE CHANGES**



“

The pacemaker. The insulin pump. The MRI. All of these came from federally funded research. **These proposed rules would put politicians — not engineers or doctors — in charge of deciding which new medical devices get developed.** That's not just bad science. It's a threat to the next generation of life-saving technologies.

”

**OPPOSE THE PROPOSED OMB RULE CHANGES**



<https://aimbe.org/advocate/omb-proposed-rule-resources/>

# Additional Community Resources

Council on Government Relations

- [OMB Proposed Rule Summary Slides](#)

FASEB Comment Tool

- [Take a quiz to identify which part of the proposal affects you](#)

National Council of Nonprofits

- [Chart of Proposed Changes](#)

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