



July 10, 2026

Submitted electronically via Regulations.gov

Docket No. OMB–2026–0034

Office of Management and Budget

Office of Federal Financial Management

Attn: Andrew Reisig and Joel Savary

Re: Comments on Proposed Rule, “Regulation for Federal Financial Assistance,” 91 Fed. Reg. 32,198 (May 29, 2026), Docket No. OMB–2026–0034

Dear Mr. Reisig and Mr. Savary:

CHORUS supports the Office of Management and Budget's commitment to strengthening accountability, transparency, and responsible stewardship in the administration of federal financial assistance. Public trust in federally funded research depends on clear standards, effective oversight, and the ability to demonstrate the value and impact of taxpayer investments.

As OMB considers updates to the federal financial assistance framework, it is important to preserve and strengthen the infrastructure that enables transparency, compliance, and long-term access to the results of federally funded research.

For more than a decade, federal agencies, research institutions, publishers, and scholarly infrastructure providers have worked together to build systems that support public access, research integrity, persistent identification, interoperability, and transparent reporting. These investments have created a more connected and accountable research ecosystem, allowing agencies and the public to better track research outputs, measure outcomes, and ensure that federally funded knowledge remains discoverable and accessible over time.

The proposed rules and regulations threaten the continued benefits of this historic investment. CHORUS is concerned that the proposed changes to grant administration and award oversight will create uncertainty that disrupts these established partnerships and infrastructure investments. Stable and predictable federal policies are essential for sustaining the systems that support compliance, public access, data sharing, research assessment, and the stewardship of the scholarly record. CHORUS has been working with federal agencies since 2013, including monitoring more than 524,600 articles reporting on funded research from the National Science Foundation and 237,800 from the Department of Energy among others. Specific concerns are detailed below.

[200.205] Merit Review and [200.340] Termination and Suspension

- **Implement political review of grant decisions:** Senior political appointees must conduct a “pre-issuance review” before grants can be awarded
- **Discount peer review recommendations:** Peer review evaluation of grant proposals is considered “advisory” only
- **Expand authority to terminate grants.** Active grants can be terminated or suspended when they no longer align with agency priorities or the national interest.

The merit review process, in which scientific experts in a particular field are brought together to review scientific proposals and assign scores that are based on the quality of the application and its potential to advance new knowledge, has underpinned many discoveries that have led to major scientific innovations. This objective approach to scientific review establishes a foundation of trust within the broader scientific community and throughout the U.S. population. Revising the rules to establish an environment that sidesteps traditional and transparent scientific metrics in favor of political review will weaken overall confidence in the U.S. research enterprise.

[200.432] Conferences, [200.454] Memberships and Subscriptions, [200.461] Publication Costs

- **Restrict ability to cover professional development costs.** Limit the use of grant funds to cover the cost of professional memberships, conference attendance, and publication and subscription costs.

Researchers (and research) benefit from the professional exchange of knowledge and ideas through professional academic societies and open discussion at conferences. Research findings are communicated, not only to an academic audience but also to the wider public, via scholarly publication, and commonly made widely available via subscription. Limiting the use of funds in this way will hinder the ability of researchers to learn about emerging advances, establish productive collaborations, and disseminate discoveries.

[200.202(e)] Research Eligibility and [200.220] Covered Foreign Collaborations

- **Limit international collaboration.** Prohibits using grant funds to collaborate with any foreign adversary, country of particular concern, or country subject to sanctions.

Broad interpretation of this section could severely limit international collaboration without express approval and bureaucratic hurdles. US science and innovation has historically benefited from international collaboration. Limiting such collaboration will isolate US researchers from important findings and opportunities for progress and innovation.

As OMB evaluates revisions to federal financial assistance regulations, CHORUS urges that the proposed rule changes not be adopted and instead that OMB work to:

- Preserve merit-based and evidence-driven approaches to research funding and oversight;

- Recognize the importance of trusted scholarly infrastructure in supporting transparency and accountability;
- Promote interoperability across agencies, institutions, publishers, and research service providers;
- Support persistent identifiers, standardized metadata, and open information exchange that improve reporting and reduce administrative burden;
- Ensure that compliance requirements strengthen, rather than complicate, public access to the findings of federally funded research and research data;
- Maintain a stable policy environment that enables long-term investments in research infrastructure and innovation.

The United States has developed a world-leading research enterprise in part because of its ability to connect federal investment with trusted systems for knowledge creation, dissemination, preservation, and reuse. Policies governing federal financial assistance should reinforce these strengths while advancing accountability and public confidence.

CHORUS looks forward to engaging with OMB, federal agencies, and stakeholders across the research ecosystem to ensure that any final rule supports both responsible stewardship of federal funds and the continued effectiveness of the nation's research infrastructure.

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