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Director Russell Vought
The Office of Management and Budget
725 17th St NW
Washington, DC 20503

Re: Comment on Proposed Rule OMB-2026-0034

We write to express our opposition to Proposed Rule OMB-2026-0034 and respectfully urge the Office of Management and Budget to withdraw this proposal.

Although the federal government unquestionably possesses broad authority to establish conditions governing federal grants, those conditions should promote national competitiveness and innovation, preserve confidence in the integrity of the scientific review process, and satisfy the requirements of reasoned administrative decision-making. Several provisions of the proposed rule do not meet those objectives.

Federal investment in scientific research has been one of the principal drivers of American technological leadership for more than seventy-five years.[1] The system has succeeded because it combines rigorous scientific peer review, institutional accountability, and predictable funding rules that allow researchers to undertake long-term, high-risk investigations whose benefits often emerge only after many years. The proposed rule would undermine these foundational principles.

Most concerning are the proposed provisions permitting agencies to terminate awards because "a termination is in the interest of the Federal agency" or because the agency determines continued funding is "no longer in the Federal Government's interests." These standards are extraordinarily broad and provide little guidance what circumstances would subject a particular research grant to termination.

Long-standing grant administration standards provide agencies authority to terminate awards, but before 2025 such terminations were unusual.[2] Under the OMB's proposed standards, research support could be withdrawn at virtually any time based on changing policy priorities rather than scientific performance or compliance with grant requirements. Such uncertainty would predictably discourage ambitious, long-term research projects. Scientific

[1] Mark Krass & Ames Grawert, *The Cost of the Trump Administration's Attacks on Research Funding*, The Brennan Center for Justice, May 14, 2026, *at* https://www.brennancenter.org/our-work/research-reports/cost-trump-administrations-attacks-research-funding.
[2] Andrew Gerard, *How Bad Is It When the Government Cancels Active Research Grants?*, Macroscience, Dec. 22, 2025, *at* https://www.macroscience.org/p/how-bad-is-it-when-the-government.

investigation often requires years of investment before producing meaningful results. Universities cannot responsibly recruit faculty, admit doctoral students, purchase specialized equipment, or establish collaborative research programs if funding may be discontinued based on indeterminate standards unrelated to scientific merit or performance.

The proposal also appears to diminish the central role of expert peer review by allowing political leadership greater discretion in determining which applications receive funding. Scientific peer review is not perfect, but it has long served as the principal mechanism for ensuring that grants are awarded on the basis of scientific quality, technical feasibility, and potential impact.[3] Decisions regarding scientific merit are generally best made by experts with relevant technical knowledge rather than by officials whose primary responsibilities are necessarily political or administrative.

Introducing broader political discretion into funding decisions risks reducing confidence that awards are based principally on scientific excellence. Even the perception that research funding depends upon alignment with current political priorities may discourage investigators from pursuing innovative or controversial lines of inquiry, despite their potential scientific importance.

The United States has become the world's leading center for scientific innovation largely because researchers have viewed American institutions as stable, predictable, and committed to academic freedom. Recent reductions, suspensions, and cancellations of numerous federally supported research projects have already generated widespread reports that some researchers are considering or accepting opportunities in other countries offering greater funding stability and institutional support. Continued uncertainty regarding the durability of federal research awards would likely accelerate this trend.[4]

Similarly, universities make long-term commitments when admitting doctoral students and maintaining research laboratories. If federal support becomes substantially less predictable, institutions may reasonably reduce the size of Ph.D. programs, delay faculty hiring, or curtail investments in emerging fields whose success depends upon sustained federal partnerships. Such decisions would reduce the nation's future scientific workforce and diminish the pipeline of researchers upon whom both government and private industry depend.[5]

These consequences extend well beyond universities. American economic competitiveness has long rested upon close collaboration among federal agencies, research universities, hospitals, national laboratories, and private industry. Breakthroughs in biotechnology, advanced materials, artificial intelligence, semiconductor technology, pharmaceuticals, communications, agriculture, and numerous other sectors frequently originate in federally supported academic research before being commercialized through private enterprise.[6] Weakening that research ecosystem would ultimately reduce innovation throughout the economy.

Other nations are actively working to match—and ultimately surpass—American leadership in innovation. Notably, they are doing so by emulating the very legal and regulatory frameworks that have underpinned U.S. preeminence for decades: robust federal funding of university

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[3] Hug, S.E. & Aschbasch, Mirjam, *Criteria for Assessing Grant Applications: A Systematic Review*, 6 PALGRAVE COMM'NS 1 (2020).
[4] Alexandra Witze, *75% of US Scientists Who Answered Nature Poll Consider Leaving*, 640 NATURE 298 (2025); *see also* Vivienne Walt, *Trump Slashed Science Funding. Now the U.S. Could Face a Costly Brain Drain*, NEW YORK TIMES, Apr. 4, 2026, *at* https://www.nytimes.com/2026/04/04/business/dealbook/trump-brain-drain-academia.html.
[5] Krass & Grawert, *supra* note 1.
[6] *Id.*

research and, through the Bayh-Dole Act, incentives for private industry to develop that research into commercial products. It would be a costly irony if the United States ceded its competitive position not because rivals outperformed us, but because we dismantled the framework they are now racing to replicate.[7]

The government unquestionably possesses legitimate interests in ensuring fiscal responsibility, protecting taxpayer funds, enforcing grant conditions, and aligning research investments with lawful national priorities. Those objectives can be achieved without adopting termination standards that lack objective limiting principles or reducing the role of independent scientific peer review.

For decades, federally supported research has generated extraordinary public benefits, including lifesaving medical treatments, technological innovation, economic growth, national security advances, and the education of future generations of scientists and engineers. Policies governing that system should reinforce—not weaken—the conditions that have enabled those successes.

Thank you for considering these comments.

Respectfully submitted,*

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*We submit this comment in our personal capacities. Our views are our own and should not be attributed to our respective institutions.

[7] Simone McCarthy *et al*., *In the Race to Attract the World's Smartest Minds, China Is Gaining on the US*, CNN, Sep. 29, 2025, *at* https://www.cnn.com/2025/09/29/china/china-reverse-brain-drain-science-tech-competition-us-intl-hnk.