



July 7, 2026

Office of Management and Budget  
725 17th Street NW  
Washington, DC 20503

**Re: Comment on Docket OMB-2026-0034, Proposed Rule “Regulation for Federal Financial Assistance”**

*Submitted online via <https://www.regulations.gov/commenton/OMB-2026-0034-0001>*

The Interdisciplinary Association for Population Health Science (IAPHS) opposes OMB’s proposed rule, OMB-2026-0034, Office of Management and Budget, Regulation for Federal Financial Assistance.

IAPHS is a big-tent, nonpartisan, scientific community that fosters rigorous research on the most pressing issues affecting individuals’ health, with the goal of improving population health. Our members study how the conditions in which people live, work, and age shape health across entire populations — work that is, by its nature, interdisciplinary, community-engaged, and focused on understanding why health outcomes differ across groups and places. On behalf of the nearly 700 scientist members of IAPHS, the organization strongly urges OMB to withdraw the proposed rule.

The proposed rule purports to enhance “transparency, accountability, and proper oversight for the Federal grantmaking process,” but in reality it will have the opposite effect. The changes will shroud the grantmaking process in secrecy, politics, and capriciousness; and undermine the U.S. scientific enterprise which has long been the envy of the world. Below, we describe how the proposed rule will have profoundly negative consequences.

**[200.205, 200.202].** The United States has been a world leader in science since WWII, in large part due to its gold standard, nonpolitical, unbiased, expert peer review process conducted by federal grant making agencies. Several provisions in the proposed rule will weaken that merit-based process as secondary to a capricious, political one. This includes provisions §200.205 and §200.202 that would give political appointees—not scientists—the final say on whether a grant is funded, require grants to demonstrably “advance the President’s policy priorities” and demand “gold standard science” without defining that term. Peer review recommendations would remain “advisory” that senior political appointees need not follow (§200.205). Neither the President nor political appointees have the expertise to discern which grants represent innovative and rigorous science. Yet, these

provisions require federal agencies to structure their grant solicitations around the President's political agenda instead of community need, or the guidance of the scientific community.

**[200.340].** Provision §200.340 will potentially waste billions of dollars by giving federal agencies authority to terminate existing grants at any time for any reason the agency decides is “in the interest of the Federal agency” — including whenever an award no longer matches shifting “agency priorities” or “the national interest.” Large grants are often funded in five-year increments because science has a long arc. Terminating an existing grant simply burns all money spent on the grant to date, wasting taxpayer dollars and obstructing science, the opposite of the proposed rule's goal of “proper oversight.” Federal agencies currently review existing grants annually for progress, so the proposal is unnecessary and wasteful.

**[200.204, 200.206].** Several provisions eliminate transparency and merit-based allocation of grants. Provision §200.204 allows federal agencies to skip publicly posting a grant solicitation whenever the agency decides that posting “would pose a national security risk or is in the national interest of the United States.” The rule defines neither phrase. Consequently, the exception could be applied to almost any solicitation, shrouding the process in secrecy. When solicitations are not posted publicly, agencies necessarily invite hand-picked people or organizations to apply — eliminating transparency, healthy competition and steering awards toward the politically favored. In a related vein, provision §200.206 invites agencies to weigh an applicant's “affiliations with organizations engaged in activities that violate Federal law, undermine public safety or national security, or advocate for the overthrow of the United States Government.” Those terms are left undefined and could readily be stretched to reach scientists affiliated with civil rights, health equity, or public health organizations whose work is not aligned with current political priorities. Screening applicants by their affiliations and viewpoints is antithetical to merit-based grant-making.

**[200.218, 200.218(d), 200.300].** Most alarming for IAPHS, the proposed rule takes direct aim at the science of health disparities itself. Provision §200.218 prohibits federal awards from being used to “promote or support theories of disparate-impact liability,” and it expressly forbids using award funds “supporting disparate-impact studies.” It defines the targeted concept as any analysis treating differences “in outcomes ... among different races, sexes, or similar groups” as evidence of a problem — even if there is no discriminatory intent involved. That description encompasses a core element of population health science. Documenting that health outcomes differ across racial, ethnic, sex-based, and socioeconomic groups — without any claim of intent — is precisely what our scientist members do, and precisely what NIH, CDC, and AHRQ have long funded. The provision's lone exception (§200.218(d)) protects only internal analysis that is neither paid for by the award nor used in connection with it — which is to say, not research at all, since research is funded and meant to be shared. Compounding this, provision §200.300 bars awards that use “race or intentional proxies for race” as a criterion for “program participation.”

Community-engaged and place-based population health research routinely focuses on neighborhoods, languages, and socioeconomic conditions that correlate with race, and the preamble's insistence that a program's "labels, objectives, or intentions" are irrelevant leaves this foundational work exposed. Taken together, these provisions would defund the necessary investigation of health disparities almost by definition.

**[200.202(e), 200.220].** The rule would also sever international scientific collaboration. Provisions §200.202(e) and §200.220 impose a domestic-first framework, bar research awards to foreign entities absent special sign-off, and prohibit funds for collaborations with broadly defined "covered foreign" countries and entities. Population health is a global enterprise — comparative studies, shared data, and cross-national cohorts generate knowledge that directly benefits Americans. These restrictions would cut U.S. scientists off from collaborators, datasets, and study populations available nowhere else.

**[200.421, 200.450].** Some provisions, such as §200.421 and §200.450, will impede scientists' ability to share research findings with the public whose taxes paid for the research and with the policymakers who can act on it. In addition, provision §200.450 newly bars using award funds for "issue advocacy or public messaging" on a "social, political, or public policy position" — a category so vague that ordinary public health communication, informing communities about the latest discoveries from research studies, could be swept in. Consequently, the real-world impact of federally funded research could be severely limited.

**[200.432, 200.454, 200.461, 200.201(b), 200.305].** Provisions §200.432, §200.454, and §200.461 will stymie scientific training and dismantle the forums scientists rely on to debate and improve research. By making journal subscription costs unallowable, provision §200.454 restricts access to scientific knowledge that has been rigorously peer-reviewed. This is akin to banning K-12 schools from buying textbooks. Consequently, only those students and scientists at resource-rich institutions will be able to access current scientific knowledge. Similarly, by banning publication open-access fees, provision §200.461 will make it cost-prohibitive for scientists—except those at the richest institutions—to disseminate findings to the public and will slow dissemination overall as scientists will publish fewer studies to avoid the fees. Furthermore, this provision is in direct conflict with the 2022 OSTP public-access memorandum requiring that federally funded research be made freely available, a conflict OMB must resolve. Also troubling, by requiring pre-approval for conference attendance, provision §200.432 puts an undue and impractical burden on scientists and federal agencies alike. Scientists cannot predict when their findings will be ready for conference presentation, nor which conference(s) will accept their papers for presentation. By creating obstacles to attendance, this provision dismantles one of the most critical venues for scientists to share, debate, and improve emerging research. As with open-access publishing, conference attendees would disproportionately come from resource-rich institutions given that it generally costs thousands of dollars to attend. The rule compounds these effects with new administrative burdens that fall hardest on the least-resourced applicants. Eliminating fixed-amount

awards (§200.201(b)) and requiring written justifications for every payment (§200.305) add accounting overhead that large universities can absorb but that small institutions, community-based partners, and emerging investigators often cannot — directly undercutting the rule's own stated goal of broadening the pool of grant recipients.

In sum, the burdens of these provisions will fall hardest on students, early-career scientists, and those at U.S. public universities — the very people on whom the future of American population health science depends. A merit review process captured by political appointees, grants terminable at will, the study of health disparities defined out of fundability, and new costs that price less-wealthy institutions out of publishing and convening together amount to a reordering of federal science away from scientific need and toward political control — not the grants-management reform the rule claims to be.

IAPHS would be pleased to provide additional information or clarification on these comments. For questions, please contact Suzanne Bevan, IAPHS Executive Director, at [sbevan@iaphs.org](mailto:sbevan@iaphs.org).

On behalf of IAPHS and our nearly 700 members, we urge OMB to withdraw this proposed rule.

Sincerely,

Jennifer Karas Montez, PhD, IAPHS President  
Marino A. Bruce, PhD, IAPHS President-Elect  
Philip M. Alberti, PhD, IAPHS Past President  
Suzanne Bevan, IAPHS Executive Director