



**Advancing
trusted research**

July 13, 2026

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

Comment of STM on “Regulation for Federal Financial Assistance”

Office of Management and Budget

Docket ID: OMB-2026-0034; Document ID: OMB-2026-0034-0001; RIN: 0348-AB88

Submitted electronically via Regulations.gov

To Whom It May Concern:

On behalf of STM and our more than 160 publishing members, we appreciate the opportunity to submit feedback on the Office of Management and Budget (OMB) proposed rule “Regulation for Federal Financial Assistance” (OMB-2026-0034), which would significantly revise 2 CFR Part 200 (the Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards).

STM (the International Association of Scientific, Technical and Medical Publishers) represents a global community of scholarly publishers that support the communication, validation, and dissemination of research. STM’s membership includes leading American businesses and nonprofit organizations, among them many of America’s foremost scientific and scholarly societies. Our members publish more than two-thirds of articles authored by American researchers, practitioners, and scholars that drive innovation, public health outcomes, and America’s economic competitiveness. Through this work, we also support American economic strength, with the US representing 45% of global revenues worth \$12.2bn.¹ STM members play a central role in:

- Facilitating peer review, ensuring the quality and integrity of research reports
- Disseminating the findings of the latest research, enabling innovation and public benefit
- Maintaining trusted scholarly infrastructure, including journals, data systems, and access platforms
- Cultivating domain-specific communities

¹ Outsell, Inc., Kate Worlock, “Scholarly Research 2026 Ecosystem View” (2026). See also European Commission/Orbis IP data: reporting shows 1,579 active US companies in the sector, reflecting operating revenues of EUR 22.96 billion in 2024 (<https://data.europa.eu/doi/10.2777/8969719>, p. 44)

Scholarly publishing is a critical component of the research and innovation system through which federal research investments generate value. Researchers, federal agencies, policymakers, clinicians, national laboratories, and industry rely on the published scholarly record every day to evaluate evidence, identify opportunities, develop new technologies, support regulatory decisions, and translate research into economic and societal benefit.

Because publishers support the infrastructure through which research findings are validated, communicated, preserved, discovered, and used, STM has a particular interest in policies affecting the integrity, dissemination, accessibility, and global reach of reports on federally funded research. These activities are foundational to the US research enterprise, supporting US innovation, competitiveness, and global leadership.

Both scholarly publishing and the federal research enterprise rely on independent peer review, transparent dissemination, and evidence-based decision-making. STM is concerned that the sweeping changes proposed in OMB-2026-0034 would undermine these critical values that have long been the basis for American leadership in research. Many of the proposed rule's provisions are counterproductive and inconsistent with long-standing laws, regulations, and Presidential policies that underpin America's research enterprise and are at odds with the stated goal of "strengthening stewardship of Federal funds." If finalized, these changes would conflict with multiple federal statutes, agency policies, and Executive Orders, thereby undermining the goals of integrity, innovation, and global leadership that this Administration has championed.

In this comment, we focus on key proposed sections that raise serious legal and policy conflicts:

1. Proposed [§ 200.461](#), [§ 200.454](#), and [§ 200.432](#): Blanket prohibition of publication costs and subscriptions and limitation on conference expenses – which contravenes statutory and regulatory mandates for research dissemination and communication.
2. Proposed [§ 200.205](#): Override of merit review process – which conflicts with Congress's intent for merit-based decision-making and Administration directives on scientific integrity.
3. Proposed [§ 200.202\(e\)](#) and [§ 200.220](#): Restrictions on international collaboration – which exceed existing research security statutes/policies and run contrary to US global science leadership goals.
4. Proposed [§ 200.340–341](#) and [§ 200.204](#): Expanded discretionary grant termination and reduced transparency in funding announcements – which would increase administrative burdens, undermine research planning, raise due process and administrative law concerns, and are inconsistent with open government principles.

By examining these specific sections in turn, we illustrate how the proposed rule is incompatible with established law and policy and would undermine American competitiveness. Taken together, these changes would weaken key mechanisms through which federally funded research is validated, disseminated, adopted, and translated into scientific progress, innovation, economic growth, and US global leadership.

1. Misalignment with goals of federal funding

1.1. Blanket Prohibition of Publication & Subscription Costs

[200.461]

[200.454]

The proposed prohibitions on subscriptions and publication and printing costs would reverse decades of federal policy recognizing dissemination costs as necessary and generally allowable research expenses. OMB's justification claims that "publication costs are not inherently necessary to carry out the core programmatic objectives of most Federal awards". However, this claim is profoundly misguided and legally problematic for several reasons:

a) Contradiction with Federal regulation & statute: Publishing is fundamental to the purpose of research funding.

The proposed prohibition conflicts with other federal mandates that explicitly encourage or require dissemination of research results. There are many statutory mandates (e.g., provisions of 42 USC. § 6607, 44 USC. § 3101, and others) requiring federal agencies to support dissemination and ensure public availability of taxpayer-funded research findings. The spirit of these mandates is reinforced by the President's "Gold Standard Science" Executive Order, which seeks to improve the communication of scientific information related to funded research. The White House fact sheet on the Executive Order specifically says that its goal is to ensure agencies "communicate scientific [information] accurately" and ensure "that scientific communication aligns with rigorous analysis."² Publishing services are private sector services provided to support these goals. Subscriptions and publication fees facilitate the rigorous process of maintaining the systems and infrastructure of high-quality content – including peer review and research integrity.³

² The White House, Fact Sheet: President Donald J. Trump Restores Gold Standard Science (May 2025) <https://www.whitehouse.gov/fact-sheets/2025/05/fact-sheet-president-donald-j-trump-is-restoring-gold-standard-science-in-america/>

³ STM, "Publishing Decoded" https://stm-assoc.org/publishing_decoded/.

The guidance for funded researchers from several federal agencies reaffirms that publishing is expected, including guidance that seeks to implement the very changes proposed in this regulation. For example, recently announced revisions to NSF's Grant Guidance to implement OMB's own proposed rule says "NSF expects significant findings from research it supports to be promptly submitted for publication."⁴ This suggests that publishing is an essential part of the research process and is key to the purpose of federal funding, as reaffirmed in statements made in like-minded governmental bodies such as "research is not completed until it is published."⁵ The NIH implementation plan for Gold Standard Science further notes that a researcher is expected to communicate scientific findings "through scientific journal publications, reports, and conferences."⁶ Banning all publication and subscription costs in §§ 200.461 & 200.454 conflicts directly with the letter and intent of these mandates.

It is a mischaracterization to claim that disseminating research findings – via journal publication or conference proceedings – is "ancillary" to an award's purpose, when Congress and agencies have long recognized such dissemination as integral to a grant's objectives. The disconnect between these proposed cost restrictions and existing law could render the new provisions legally vulnerable as inconsistent with the "effective and efficient" execution of agency authority required by statute.

In addition, the claim that "such [publishing] activities are discretionary" in the justification for changes to § 200.461 is contradicted by the very proposed rule. § 200.315, which is not proposed to be changed, implicitly requires publication in a journal to fulfil grant requirements.

Publishing remains a critical part of how researchers do their work. According to the Congressional Research Service in 2022, US researchers produced approximately 464,000 peer-reviewed articles in 2020. Between 195,000 and 263,000 (42 to 57%) of those articles resulted from federally funded research.⁷ Current STM analysis provides an estimate that at least 229,417 articles were based on federally funded research and published in 2025, representing 51% of the total US article output.⁸

The combined impact of §§ 200.461 and 200.454 is that researchers will be unable to recover the costs of publishing federally funded research while also being unable to

⁴ National Science Foundation, Implementation Guidance for NSF Policy on Open Research and Transparency, NSF-2026-ORT-0001-0003.
<https://www.federalregister.gov/documents/2026/06/24/2026-12725/agency-information-collection-activities-comment-request-national-science-foundation-proposalaward>.

⁵ Sir Mark Walport, United Kingdom Government Chief Scientific Adviser, evidence to the House of Lords June 24, 2009: <https://publications.parliament.uk/pa/ld200809/ldselect/lddeucom/164/9062402.htm>.

⁶ National Institutes of Health, "Leading in Gold Standard Science" (2025)
<https://www.nih.gov/sites/default/files/2025-08/2025-gss.pdf>.

⁷ Congressional Research Service, "Public Access to Scientific Publications Resulting from Federally Funded R&D (2022) <https://crsreports.congress.gov/product/pdf/IN/IN12049>.

⁸ STM analysis of Scopus data (2026)

recover the costs of accessing the published research needed to conduct future work. In this way, OMB's proposed regulation undermines the broader objective of federally funded research.

b) Inconsistency with the Administration's public access policies and statutes

The current Administration has reaffirmed the previous Administration's commitment to open science and public access, in both the President's Gold Standard Science Executive Order and in individual agency actions. In August 2022, OSTP issued guidance directing all federal agencies to ensure publications reporting on federally funded research be made available to the public. The Trump Administration has reinforced this across the government. For example, pursuant to that guidance, under Dr. Bhattacharya NIH accelerated the implementation of the agency's public access policy to July 2025. These requirements are also consistent with Congressional directives on public access in PL 111-8.⁹

In addition, 2 CFR § 200.315(b) & (f) (which OMB does not propose to change) encourages agencies to "require public access" to articles reporting on funded research. Section 200.315(f) further directs recipients to "maximize public access" to such works. This language again reinforces the idea that publishing is important to the federal government and instrumental for achieving grant goals.

STM notes that there is no cost-free route to publishing and the federal agency repositories do not have the infrastructure to support peer review services and other key components of scholarly publishing infrastructure. The services that publishers provide need to be supported by sustainable and reliable funding to achieve the government's goals for research integrity, reliability, transparency, dissemination, and preservation. Contrary to some assertions, no federal claim can force publishers to provide these services for free.¹⁰

By effectively defunding both publishing fees and subscription costs, the OMB proposal undermines this push for immediate public access to published research. OSTP's public access policies, the NIH Public Access Policy, and similar agency initiatives are all premised on the understanding that publication of research outcomes is fundamental, and that immediate access to high-quality peer-reviewed research serves

⁹ National Institutes of Health, NIH Grants Policy Statement, § 8.2.2, "NIH Public Access Policy" (rev. Mar. 2026) ("The 2024 NIH Public Access Policy implements Division F, Section 217 of Pub. L. No. 111-8" and requires NIH-funded investigators to submit final peer-reviewed manuscripts to PubMed Central for public availability without embargo upon the official date of publication).

https://grants.nih.gov/grants/policy/nihgps/html5/section_8/8.2.2_nih_public_access_policy.htm

¹⁰ Seán M. O'Connor, "Government Open Access Policies and the "Federal Purpose License" for Publicly Funded Research Results in the United States and Select Other Nations: Legal Context and Limitations" (2026) <https://stm-assoc.org/document/government-open-access-policies-and-the-federal-purpose-license/>

important public purposes. If agencies cannot use grant funds for page charges or open-access fees, they will struggle to comply with OSTP's directive to provide free, immediate access to research outputs. In other words, OMB's own rule would undermine the publication system that federal agencies depend on to achieve the Administration's open science goals.

c) Funding for publishing is critical

Publishing is not simply the final dissemination step in the research process. High-quality peer-reviewed journals provide the infrastructure that translates federally funded research into scientific, economic, and societal value. Federal agencies, researchers, industry, and policymakers rely on publisher-supported systems at every stage of the research process, to review existing knowledge, evaluate research proposals, conduct new research, communicate findings, and assess impact. These functions help maximize the return on federal research investments and support US innovation and global competitiveness. STM members make sustained investments in making published research reliable, discoverable, reusable, and archived for the long term:

- **Discovery and research development:** researchers, agencies, and other users of research rely on access to the published scientific record to understand the state of the field, identify knowledge gaps, evaluate prior results, and drive forward innovation. Publishers invest in maintaining the Version of Record as the authoritative, curated, and citable research article. Supporting systems include metadata, persistent identifiers, citation linking, indexing, accessibility, interoperability, search and discovery tools, platform security, content hosting, archiving, and long-term preservation. This allows researchers and innovators to advance existing knowledge and accelerate progress.
- **Evaluation and validation:** publishers invest in rigorous processes to evaluate and improve submitted research, including editorial and peer review systems; research integrity tools, including plagiarism screening, image checks, fraud and paper-mill detection, identity verification, authorship standards, conflict-of-interest disclosures, and ethics policies; and the author, reviewer, production, quality-control, and technology support needed to produce and maintain produce and maintain the Version of Record.
- **Research integrity, trust, and AI readiness:** these functions are becoming increasingly important as threats to research integrity grow in volume and sophistication, including fraudulent submissions, paper mills, inappropriate AI-generated content, and image manipulation. These safeguards cannot be maintained if the rule removes sustainable funding for publication and access infrastructure. At the same time, artificial intelligence systems increasingly depend on trustworthy and well-provenanced scientific information. Publishers'

investments in peer review, integrity screening, metadata, citation networks, and persistent identifiers provide the traceability and accountability that allow researchers, policymakers, industry, and AI-enabled systems to distinguish validated research from unverified claims.

Publisher contributions are often invisible when they work well, but they are essential to the federal government's own goals for rigorous, transparent, and trustworthy science, including the aims of Gold Standard Science. Whether supported through subscriptions, publication charges, society revenues, or other lawful models, journals require sustainable funding to provide the independent validation and communication systems on which researchers, funders, policymakers, clinicians, industry, and the public rely. Categorically prohibiting both subscription and publication costs would weaken that infrastructure and reduce the return on federal research investments.

d) Harm to US public and global competitiveness: Forcing researchers to “fly blind” and limiting the impact of federal investments in research.

Barring researchers from using grant funds to publish or access scientific and scholarly literature harms federally funded research at both the beginning and end of the research process. The result of such restrictions would be fewer research findings shared, slower knowledge diffusion, and diminished returns on federal R&D investments.

First, it would force US researchers and other US users of research to “fly blind.” Access to the literature (enabled by subscriptions or supported by publication costs) enables researchers to build on prior work efficiently, avoiding duplication and accelerating progress. It also facilitates American economic development as US industry builds on that work. For example, commercial breakthroughs such as mRNA Vaccine Technology,¹¹ or cisplatin cancer treatments only became usable because the underlying research was communicated and applied after journal articles about them passed through peer review, editorial vetting, and the published Version of Record.¹² It is an efficient use of taxpayer funds to provide functionally necessary inputs to federally funded research. Limiting access reduces the return on federal research investment by making scientific progress slower and more difficult. At a time when other research-intensive countries are expanding investments in publishing,¹³ restrictions on access

¹¹ University of Pennsylvania, “Katalin Karikó and Drew Weissman, Penn’s historic mRNA vaccine research team, win 2023 Nobel”, Penn Today (2023) <https://penntoday.upenn.edu/news/katalin-kariko-and-drew-weissman-penns-historic-mrna-vaccine-research-team-win-2023-nobel>.

¹² Michigan State University, “Cisplatin cancer drug wins national award”, MSU Today (2025) <https://msutoday.msu.edu/news/2025/09/cisplatin-cancer-drug-wins-national-award>.

¹³ National Bureau of Economic Research, “China’s Rise in Global Research”, NBER Digest, Apr. 2026 <https://www.nber.org/digest/202604/chinas-rise-global-research?page=1&perPage=50>.

(by banning subscription expenses and subscription costs) place US researchers at a competitive disadvantage, putting the US' leadership in strategically important fields such as artificial intelligence, biotechnology, and energy dominance at risk.

At the conclusion of the research process, funding for quality publications (enabled directly through publishing fees or indirectly through subscription support for journals) magnifies the return on federal research investments as well. Publication is not an “optional add-on;” it is the final step that transforms research into public value. Without the ability for grant recipients to cover publication costs, taxpayer-funded discoveries could languish in lab notebooks rather than informing new cures, technologies, and evidence-based policies. This severing of communication channels would isolate US researchers from their global peers and weaken the nation's scientific leadership. Research that is not informed by access to prior knowledge, current developments, or that cannot effectively share its own findings with US industry, academia, and the public, cannot achieve its full impact.

Federally funded R&D underpins a significant share of US productivity growth and innovation output.¹⁴ NSF's Science and Engineering Indicators consistently show that public R&D investment yields substantial long-term economic returns, generally far exceeding initial costs. However, these pathways depend on accessible, validated, and discoverable research outputs enabled through publication and scholarly communication systems. Without dissemination, research cannot translate into innovation, market benefits, or economic growth.

It is telling that OMB's own justification acknowledges no programmatic benefit of this ban beyond cost-cutting; yet the cost of supporting publication and dissemination is minimal – a fraction of 1% of research budgets in many fields – compared to the enormous scientific, economic, societal benefits gained. It is also important to note that publishing is highly efficient. US research spending has doubled over the past decade. Over that period, published output rose nearly 60%, while overall journal publishing revenues increased only 18%.¹⁵ The fact that publishing revenues have grown far more slowly than research activity underscores the value publishers deliver and the efficiency gains across individual publishers.

¹⁴ Federal Reserve Bank of Dallas, The Returns to Government R&D: Evidence from U.S. Appropriations Shocks (2023) <https://www.dallasfed.org/~media/documents/research/papers/2023/wp2305r2.pdf>.

¹⁵ Actual growth is likely lower as the 18% calculation is before adjusting for inflation, based on Simba Information reports from 2013 and 2024 (<https://www.stm-publishing.com/global-sales-in-the-scientific-and-technical-publishing-market-increased-just-0-2-percent-in-2012-says-simba-report/> and <https://www.stm-publishing.com/global-scientific-technical-publishing-2023-2027/>). Other figures are from the National Science Foundation's National Center for Science and Engineering Statistics (NCSES): Research and Development: U.S. Trends and International Comparisons 2025 <https://ncses.nsf.gov/pubs/nsb20256/> and Science and Engineering Indicators 2023: Publication Output by Region, Country, or Economy and by Scientific Field <https://ncses.nsf.gov/pubs/nsb202333>.

e) Increased administrative burdens

Given the volume of federally funded research outputs each year, requiring case-by-case prior approval for publication costs would create an unscalable administrative process for agencies, recipients, subrecipients, and publication partners. Publication costs are generally standardized, auditable, and predictable; replacing allowability with individualized approvals would increase transaction costs, slow dissemination, and undermine the rule's stated goal of administrative efficiency.

As noted by other commenters,¹⁶ the burdens introduced by these provisions is exacerbated by other aspects of the OMB proposal. In particular, the proposed elimination of fixed-amount awards (§§ 200.333 and 200.201(b)(4)) would exacerbate the publication cost problem: even where publication costs remain technically allowable, moving to a strict incurred-cost reimbursement model means institutions would have to individually document and justify every single charge, which adds exactly the kind of administrative burden this rule claims to be cutting. It would also slow the payment and publication process at exactly the moment researchers are working to meet public access deadlines.

Section Conclusion

In summary, the blanket ban on publication and subscription costs in proposed §§ 200.461 and 200.454 conflicts with existing law and policy and would undercut the Administration's Gold Standard Science goals. A rule that categorically removes support for these activities would make federal research less efficient, less discoverable, less trustworthy, and less valuable to the American taxpayer. We also agree with ARL's submission that says that publishing is "a critical return on investment for the American taxpayer, which has been shown to promote efficiency gains, enhance innovation, and contribute to economic growth."¹⁷

STM strongly urges OMB to withdraw proposed changes to 2 CFR §§ 200.454 and 200.461 and instead continue to affirmatively allow publication and subscription costs under the general cost principles of being "necessary to fulfill the award requirements". This longstanding approach ensures dissemination is treated as a core, allowable part of research funding, especially when there are statutory requirements for publication. This is consistent with agency missions, statutes, and the public interest.

¹⁶ For example, the American Council on Education <https://www.acenet.edu/Documents/Comments-OMB-Uniform-Guidance-070826.pdf>

¹⁷ Association of Research Libraries, "ARL Comments on Regulation for FFA," July 7, 2026 — PDF: <https://www.arl.org/wp-content/uploads/2026/07/ARL-Comments-on-Regulation-for-FFA.pdf>

1.2. Restriction on conference costs

[200.432]

STM members support many of the channels through which research findings are exchanged, scrutinized, and disseminated – including journals, conference proceedings, and scholarly meetings. OMB proposes to make conference attendance costs allowable only when an agency expressly approves the participation and includes that approval in the award's terms and conditions. Like the proposed restrictions on publication and subscription costs, this change would treat dissemination and engagement as ancillary to federal research awards, even though sharing findings is central to the purpose of federal research funding.

This proposal conflicts with the same statutory and policy framework that recognizes dissemination as an integral component of federally funded research. In many research areas, conferences are a primary forum for researchers to present findings, test and refine ideas, receive expert feedback, and ensure that taxpayer-funded research reaches the communities that can build on it. Crucial areas of American research investment such as artificial intelligence, biotechnology, and quantum rely on engaged dialogue that can only happen at meetings. In some fields, conference proceedings are also a central publication venue, funded by conference fees. Restricting conference participation would therefore impair the communication of research results, slow down the potential for federally funded discoveries to influence science, industry, or policy, and reduce the overall public value of federal investments.

Further, the proposed approval requirement would create a burdensome and difficult-to-administer process for both agencies and recipients, conflicting with the goal of the proposed changes to reduce administrative burdens. Because “conference” is not clearly defined, the restriction could sweep in routine research meetings, scholarly exchanges, or minor costs associated with sharing results with relevant experts. It is also unrealistic to expect applicants to identify every conference, meeting, or dissemination opportunity at the time of application. The result would be to discourage timely communication of federally funded research findings, and to limit researchers' access to current developments in their fields.

STM therefore recommends that OMB withdraw the proposed change to § 200.432, and instead continue to appropriately recognize conference participation as allowable costs when necessary and reasonable for carrying out the award and sharing its results.

2. Conflict with Gold Standard Science and Organic Statutes and undermining US Scientific Leadership

[200.205]

As noted in the introduction, STM is gravely concerned that the proposed regulation is in conflict with Administration priorities for American scientific leadership and Gold Standard Science, as well as with statutes, regulations, and guidance on merit review and avoidance of bias.

We note the following practical and legal concerns:

2.1. Erosion of peer/merit review puts US leadership and discoveries at risk

The United States' research funding system has, since the mid-20th century, relied on independent expert peer review and merit-based selection as the global "gold standard" for quality and impact. Congress has reaffirmed in law that "sustained, predictable Federal funding of basic research is essential to United States leadership in science and technology" and that merit-based peer review is indispensable to identify high-quality research with societal benefits.¹⁸ This model has enabled breakthroughs from decoding the human genome to developing life-saving cancer immunotherapies, and fostered public trust in US science institutions and their rigorous processes. These outcomes cannot always be predicted at the point of funding.

OMB's proposal would undermine this critical engine of US leadership and scientific progress. STM and its members know the value of evidence-based decision-making to ensure independence, accuracy, and reliability. Scholarly publishing depends on the same principles of merit-based assessment, scientific integrity, and expert review that underpin federal grant funding, ensuring independent and rigorous standards to be upheld in evaluation. In line with the values articulated in the President's Gold Standard Science Executive Order, scientific rigor, ethical practice, and avoidance of bias are more appropriate criteria than vaguely defined categories of activities (e.g. "racial preferences," "anti-American values") that could encompass legitimate lines of research or outreach.

Human knowledge and scientific progress do not always progress in a straight line and the potential economic, public health, or societal impact may not be evident at the time

¹⁸ The American Innovation and Competitiveness Act, signed into law by President Trump [US Code Title 42, § 1862s] [https://uscode.house.gov/view.xhtml?req=\(title:42%20section:1862s%20edition:prelim](https://uscode.house.gov/view.xhtml?req=(title:42%20section:1862s%20edition:prelim)

that a project is funded. Adding additional requirements for political review – which already are part of the funding process – and requiring that direct benefits of a project are immediate and aligned with short-term policy goals would destroy a critical engine for progress. The research project that led to Google and our modern internet came from NSF-funded research into a mathematical algorithm.¹⁹ Modern weight-loss drugs would not be possible without fundamental research into Gila monster venom funded by NSF in 1958, and continued in the 1980s and 90s with support by the Veteran’s Administration, without any expectation of becoming a treatment.^{20 21} These billion and trillion dollar markets were built on the back of fundamental research that would be unlikely to be funded under OMB’s proposed rule.²² This reinforces why interference in peer review puts US leadership and future innovation at risk.

2.2. Conflict with legislative mandates for scientific merit review

Congress has repeatedly affirmed that agencies like NIH, NSF, DOE, and NASA must base funding decisions on scientific merit and expert peer review rather than political criteria. For example, 42 USC § 1862s (2017) explicitly “reaffirms merit-based peer review” at NSF and requires retention of intellectual merit and broader impacts criteria.²³ Other agency-specific statutes (e.g., 42 USC § 282(b)(9) for NIH)²⁴ enshrine the principle of independent scientific peer review in grantmaking. By subordinating merit-based evaluation to partisan litmus tests (such as alignment with short-term presidential agendas), proposed § 200.205 would undermine these statutory frameworks. Moreover, by concentrating funding power in the hands of a few political appointees, the rule may impinge on Congress’s constitutional power of the purse (Art I, Sec 9), which vests budgetary decisions in the legislative branch. Members of Congress have already warned that this OMB effort “undermine scientific and

¹⁹ See, for example, Cada, “How Two Stanford Students Turned a \$4.5 Million NSF Grant into Google—the Trillion-Dollar Search Engine That Changed the World,” Cada. Available at: <https://www.getcada.com/post/how-two-stanford-students-turned-a-4-5-million-nsf-grant-into-google--the-trillion-dollar-search-engine-that-changed-the-world>.

²⁰ National Science Foundation, Eighth Annual Report of the National Science Foundation, Fiscal Year 1958 (1958) (listing NSF-supported research on Gila monster venom). Available at: https://nsf.gov/resources/nsf.gov/files/ar_1958.pdf?VersionId=nBTB4I1J76RRU3llFN4WM_fDS_8JQbq0.

²¹ See, for example, Uplevel Biotechnology, “Exenatide: From Gila Monster Venom to GLP-1 Drug,” Uplevel Biotechnology, <https://www.uplevel.bio/articles/exenatide-gila-monster>.

²² Many other examples have been highlighted by the Golden Goose Award <https://www.goldengooseaward.org/>

²³ American Innovation and Competitiveness Act, Pub. L. No. 114-329, § 103 (2017) (codified at 42 USC. § 1862s), <https://www.law.cornell.edu/uscode/text/42/1862s>

²⁴ Food and Drug Administration Amendments Act of 2007, Pub. L. No. 110-85, § 103 (2007) (amending 42 USC. § 282), <https://uscode.house.gov/view.xhtml?req=granuleid:USC-2000-title42-section282&num=0&edition=2000>.

biomedical research”²⁵ and conflicts with “Congress’s constitutional power of the purse.”²⁶

2.3. Deviation from Gold Standard Science and scientific integrity norms

Regardless of administration, American science policy has upheld that research decisions should be insulated from inappropriate political interference. For instance, the Administration’s Executive Order 14303 (“Restoring Gold Standard Science,” May 2025) underscores that “reproducibility, rigor, and unbiased peer review must be maintained” to preserve trust in federal scientific research.

By granting political officials final say over individual grants, proposed § 200.205 undermines this principle and blurs the line between political priorities and expert scientific judgment. Merit-based peer review is widely considered the “gold standard” for ensuring that funded research is rigorous, relevant, and unbiased, and has been emulated by other countries seeking to enhance their scientific output. Diminishing peer review in favor of ideological litmus tests or bureaucratic second-guessing would erode the objectivity and credibility of US science funding, ultimately making that funding less of a good investment for the American taxpayer.

2.4. Risk of censorship and misalignment of “Administration priorities” with scientific goals

The Administration’s Gold Standard Science Executive Order puts scientific integrity front and center and decries the politicization of science by previous Administrations. It directs the government to ensure “that Federal decisions are informed by the most credible, reliable, and impartial scientific evidence available.”²⁷ The Executive Order criticizes the use of political criteria like DEI in scientific decision-making. Section 205’s requirements contradict this directive by encouraging political override of expert judgement in awarding grants – effectively injecting politics into science funding decisions.

Likewise, § 200.205’s vague ban on research that involves “racial preferences” or “advocacy” could be misused to prevent critical Administration-aligned research or community-engaged projects in fields like public health and education. For example, funding for Secretary Kennedy’s “Operation TrialBlazer” could be put at risk as it looks

²⁵ Letter from Senator Collins <https://www.appropriations.senate.gov/news/majority/sen-collins-asks-omb-to-withdraw-parts-of-grant-rule-extend-comment-period>

²⁶ Letter from Senate Democrats: <https://www.appropriations.senate.gov/imo/media/doc/1.pdf>. Senator Collins’ letter makes a similar point, as did Representative Rosa DeLauro in comments in House Appropriations Committee markups this year.

²⁷ Executive Order No. 14303, Restoring Gold Standard Science (May 23, 2025), <https://www.whitehouse.gov/presidential-actions/2025/05/restoring-gold-standard-science/>.

at hereditary diseases that may have a racial component.²⁸ Viewpoint-based funding restrictions, which could be enabled by the proposal, have been criticized by the President and were a motivation for the Gold Standard Science Executive Order. They also raise serious First Amendment and academic freedom issues and may draw comparisons to policies that courts have found unlawful in the past (e.g. attempts to cancel grants due to their “politically disfavored” content have been ruled arbitrary, capricious, and unlawful under the Administrative Procedure Act).

2.5. Criteria for prioritization are not objective and may conflict with each other

STM supports rigor, transparency, reproducibility where appropriate, and unbiased peer review as articulated in the President’s Gold Standard Science Executive Order. However, while useful as guidelines, these terms are not defined with sufficient clarity in the proposed regulation to serve as award-selection criteria, and because they can apply to varying degrees to different areas of research (e.g., transparency requirements for defense research may be different than that for basic energy research) they could conflict with the expert, mission-specific standards that agencies already use to evaluate project proposals. Even within the same general area of research, not all of the criteria are equally applicable to all areas of study. In health for example, not every important line of research is reproducible in the same way: studies of rare diseases, singular events, longitudinal cohorts, clinical populations, large-scale observatories, field research, or historical datasets may be rigorous and essential even if the underlying conditions cannot be recreated. Treating “reproducible scholarship” as a broad institutional preference could therefore disadvantage legitimate institutions and research areas whose work is valuable precisely because it addresses complex, uncommon, or time-sensitive questions. Likewise, while “Gold Standard Science” describes important principles, it is not a self-executing, measurable standard for comparing applicants across disciplines, agencies, or award types.

Section Conclusion

The US system of competitive, expert-driven grant review has produced unparalleled returns in scientific breakthroughs and innovation. Empirical studies suggest that peer review helps ensure quality and efficiency in research by weeding out flawed proposals and improving funded projects.²⁹ If adopted, the proposed oversight would displace

²⁸ US Department of Health and Human Services, “HHS Launches Clinical Trials Reform Initiative to Improve Patient Safety, Accelerate Innovation, and Increase Transparency,” HHS Press Release (June 18, 2025) (announcing Operation TrialBlazer), <https://www.hhs.gov/press-room/hhs-launches-clinical-trials-reform-initiative.html>.

²⁹ Gallo SA and Glisson SR (2018) External Tests of Peer Review Validity Via Impact Measures. *Front. Res. Metr. Anal.* 3:22. doi: 10.3389/frma.2018.00022

those expert judgments with potentially shifting political or ideological considerations, risking funding for suboptimal projects and inefficient use of taxpayer dollars.

Overall, the proposed § 200.205 would upend the proven processes that have made US science a global leader and undermine global competitiveness. By sidelining peer review and agency expertise, it opens the door to politicization and favoritism in grants – a risk our nation deliberately avoided since post-WWII science policy was established. It also closes the door to new, unexpected discoveries that come from incremental foundational research. This drastic shift would violate both clear Congressional directives and the Administration’s own scientific integrity standards. We urge OMB to withdraw the proposed § 200.205 and preserve merit based, expert-driven grant selection as the bedrock of federal research funding.

3. Ceding US Leadership to Foreign Competitors

STM understands the need for the US to have robust research security protocols and to prioritize US research for US research funding. However, provisions of the OMB proposal would work counter to the goals of maintaining American leadership and engagement with the global scientific enterprise. Such engagement has historically enabled greater reach and impact of funded research.^{30,31} As Dr. Bindu Nair, Director of Basic Research in President Trump’s Department of Defense in 2020, said: “It is important not to step away from international interaction, even when some countries have learned how to exploit and gain value from US advances.”³² STM recognizes legitimate national security and research security concerns but is concerned that broad or undefined restrictions could chill lawful, productive, and necessary international scientific collaboration, including collaboration that supports peer review, publication, standards development, conferences, data sharing, and global research networks. Two provisions in the OMB proposal raise particular concerns:

³⁰ International collaborations increase the impact of research, as measured by citations, according to Chinchilla-Rodríguez, Sugimoto, and Larivière 2019; Narin, Stevens, and Whitlow 1991; Sugimoto et al. 2017. See also National Science Board, Science & Engineering Indicators 2022: International Collaboration and Citations (NSF/NCSES, 2023). <https://ncses.nsf.gov/pubs/nsb202333/international-collaboration-and-citations>

³¹ National Academies of Sciences, Engineering, and Medicine, Strengthening US Science and Technology Leadership through Global Cooperation and Partnerships (2021). <https://www.nationalacademies.org/read/26290>

³² National Academies of Sciences, Engineering, and Medicine. 2021. Strengthening US Science and Technology Leadership through Global Cooperation and Partnerships: Proceedings of a Workshop Series—in Brief. Washington, DC: The National Academies Press. <https://doi.org/10.17226/26290>

3.1. Conflict with goals for US science diplomacy & global leadership

[200.202(e)]

The United States has long championed open scientific collaboration as a pillar of innovation and diplomacy. The State Department Basic Authorities Act (22 USC. § 2656) encourages international scientific cooperation to advance US interests.

Administration policies reinforce this: Agency research security guidance explicitly emphasizes “balancing security measures with international collaboration.”³³ Blanket restrictions on foreign engagement contradict these priorities and would isolate US researchers just when other nations are investing heavily in global science partnerships. There is strong evidence that international collaboration increases the impact of research: internationally co-authored publications tend to have significantly higher citation rates and influence, strengthening US leadership through shared knowledge.³⁴ The proposed constraints on foreign participation risk disrupting critical areas like emerging technologies, energy dominance, and American health and biotechnology that inherently require cross-border collaboration.

Chilling of key collaboration opportunities

Scholarly communication is inherently international. The “domestic first” criteria and related approval requirements would create substantial administrative burdens that are likely to reduce collaboration even where an international component would satisfy the proposed standard. Research partnerships often develop as projects evolve: a needed dataset may be held abroad, a specialized facility may be located outside the United States, an international standards body may be essential to implementation, or a foreign expert may be best positioned to validate results in a different setting.

Requiring recipients to anticipate and justify all such collaborations at the outset would be unrealistic and would discourage researchers from pursuing valuable opportunities that arise during the life of an award. It would also invite inconsistent agency decisions, because terms such as “compelling interest,” “domestic first,” and alignment with “Administration priorities” do not provide clear, objective criteria for determining when international participation is permissible. Faced with that uncertainty, agencies and recipients may default to avoiding lawful and beneficial collaboration, even when the collaboration would strengthen the research, improve dissemination, and advance US interests. This chilling effect would undermine the purpose of federal research funding by narrowing access to global expertise and reducing the ability of US-funded research findings to be tested, validated, and used internationally.

³³ See, for example, NSF’s research security page: <https://www.nsf.gov/research-security>

³⁴ National Science Foundation: Publications Output: U.S Trends and International Comparisons <https://nces.nsf.gov/pubs/nsb20214/international-collaboration-and-citations>

STM therefore recommends that OMB withdraw § 200.202(e) in order to preserve agency discretion to support international participation when it advances statutory research objectives, scientific merit, research security, and the national interest, and avoid creating a presumption against international collaboration that would undermine US scientific leadership.

3.2. Existing national security frameworks balance security with global science

[200.220]

National security and research security are legitimate concerns – indeed, President Trump’s NSPM-33 (January 2021) and subsequent OSTP guidance (January 2022) outlined rigorous disclosure and oversight requirements for “foreign government-sponsored talent recruitment programs” and other undue foreign influence risks. However, the proposed § 200.220 extends well beyond those targeted measures, sweeping up routine university collaborations, international conferences, and co-authorships that are essential to modern science. The broad and undefined scope of “bilateral or multilateral collaboration, agreement, program, or activity” could chill or bar lawful, beneficial interactions with foreign colleagues, even in basic research contexts or where there is limited sharing of sensitive information. For example, this might prevent a researcher from reviewing an article written by an author from a covered country, limiting their interaction with important research findings. This goes beyond any specific statutory restriction enacted by Congress, effectively making OMB or individual agency senior appointees unilateral arbiters of acceptable international science partnerships. OMB has not identified any clear statutory authority for such a claim. In short, the research security provisions of the proposed rule are more of a blunt instrument than a scalpel and, as a result, are likely to do more harm than good.

We recommend withdrawing § 200.220 and instead encouraging agencies to rely on existing, more nuanced frameworks (e.g. the CHIPS and Science Act’s science and security provisions, and tailored agency policies under NSPM-33 guidance) to address specific national security risks without discouraging beneficial global science engagement.

4. Uncertainty and lack of transparency undermine American science

Science thrives when researchers have the ability to plan ahead, through clear and transparent processes for grant awards and continuation. OMB’s proposed regulation explicitly recognizes this in proposed revisions to 200.202 that encourages the use of multi-year awards, noting that this will enable “long-term planning and execution of

complex projects,” worthy goals for this Administration. This, amongst other provisions in the proposal, also “promotes efficiency and reduces unnecessary administrative burden.”

Transparency and accountability are central to the work of STM members in “Advancing Trusted Research.” The principles of transparency, accountability, and stability are also embedded throughout this Administration’s directives and Executive Orders, including the Gold Standard Science Executive Order. However, several provisions in the proposed rule run directly counter to these goals. This is not just toxic for science and research but also for the good government priorities of the President. These provisions are discussed below:

4.1. Effective research needs certainty and independence **[200.340]**

OMB proposes to give agencies a new authority to terminate or suspend grants at any time for nearly any reason, with minimal justification and with no opportunity for appeal. This runs counter to the goals of support for research planning and would undermine complex projects. For STM and its members, this uncertainty has a direct connection to the scholarly record. Where grants are terminated suddenly, this may lead to the loss of data, preliminary findings, methods, protocols, software, negative results, or other research outputs that have value for the public and for future research that have already been produced. Those outputs should not disappear simply because an award is ended. Taxpayers have an interest in seeing what was learned from even a short period of federal support, and the research community needs access to validated, discoverable, and preserved information about partial or terminated projects so that others can avoid duplicative work, assess what remains reliable, and build on any useful results.

Publisher-supported systems are one of the principal mechanisms through which those outputs are evaluated, described, linked to underlying data, preserved, and made discoverable over time. Abrupt cancelation would mean the elimination of funding to ensure the preservation and dissemination of data and reports of the funded outcomes. Combined with the proposal’s restrictions on publication, subscription, conference, and dissemination costs, § 200.340(a)(2) would make it harder for researchers to communicate what was done before termination and for journals, proceedings, repositories, and scholarly platforms to help turn partial findings into accountable public knowledge. That outcome would undermine, rather than strengthen, stewardship of federal funds.

It also could potentially invite arbitrary and capricious agency actions, in conflict with Administrative Procedure Act (APA) requirements for reasoned decision-making (5 USC. § 706) and due process principles. If OMB’s rule were finalized, awards would

be at risk of termination midstream not for researcher misconduct or failure to perform (which existing law already addresses), but on a unilateral determination that the grant no longer aligns with shifting priorities – or simply because the government no longer wanted to fund it.

While this language may be borrowed from federal contracting concepts, it is important to recognize that federal financial assistance awards are fundamentally different from procurement contracts or other work-for-hire arrangements. A procurement contract is used when the government is buying goods or services for its own direct use; in that context, a termination-for-convenience clause reflects the government's role as a purchaser managing its own operational needs. By contrast, grants and cooperative agreements are used to support activities authorized by Congress that advance a public purpose, such as scientific research, education, public health, or innovation. Under the Federal Grant and Cooperative Agreement Act and 2 CFR § 200.201, agencies must choose the appropriate instrument based on that distinction, not simply import procurement concepts into financial assistance awards.

That distinction matters because research grants are not ordinary purchases with interchangeable deliverables. They are structured around statutory program goals, peer-reviewed project plans, access to prior knowledge, multi-year commitments, institutional cost-sharing, personnel decisions, research-subject approvals, data collection, and dissemination obligations (including conferences and publications). Recipients and collaborators make long-term commitments that rely on an award's approved scope and period of performance. Allowing agencies to terminate such awards based on broad, shifting, or insufficiently explained priorities would therefore disrupt ongoing research, waste prior federal investments, and undermine the stability that federal financial assistance is designed to provide. In the research context, this unpredictability would limit the types of research that investigators might be willing to undertake with federal funding, removing vast potential areas of investigation that could reap benefits for the American public as researchers are deterred from pursuing important but long-term ideas that could be defunded at any moment. If ambitious projects are funded, the uncertainty would force researchers to create systems that insure against abrupt cancellation and work to curry favor with funders rather than pursuing their research goals, wasting taxpayer money with administrative burdens and unnecessary steps.

STM urges OMB to withdraw the new discretionary termination provisions in § 200.340(a)(2) and the conforming provision at § 200.341(c).

4.2. Accountability goes with certainty to support science, planning, and good government

[200.341]

While the justification for the change to § 200.340 notes that § 200.340(a)(2) “would still require a basic rationale,” such a limited summary provides little reassurance against abuse, as it explicitly need not include any detailed justification. It is also not reviewable; in the case of terminations for noncompliance, agencies must provide the recipient with an opportunity to object that is not available for discretionary termination. It is incongruous that awards terminated for cause would have more potential for remediation than awards terminated for convenience.

These provisions also run counter to the Administration’s commitment to transparency and accountability for government decision-making, values also fundamental to STM members. The Administration’s actions on these issues as well as federal responsiveness would be undermined by a regulation that does not allow for appeal.

STM urges OMB to withdraw the provision at § 200.341(c) along with the provision at § 200.340(a)(2) upon which it relies. If § 200.340(a)(2) is retained, § 200.341(c) should be revised to require a full justification and provide an opportunity to object in the case of discretionary termination. This is in the government’s interest to ensure that funding subject to these terms is used in the most efficient and effective manner to achieve the project’s goals.

4.3. Reduction of transparency and accountability

[200.204]

The proposal to relax public Funding Opportunity Announcement (FOA) requirements in § 200.204 is counter to both the stated justification for this proposed rule and the Administration’s own commitments to transparency, accountability, and oversight reflected in Executive Order 14332, Improving Oversight of Federal Grantmaking.³⁵ While the justification states that the provisions are meant to ensure that all discretionary awards will be noticed, in practice it allows an exemption simply if an agency head unilaterally determines that the announcement is not in the interest of the United States. It also allows discretionary awards to be selected on a non-competitive basis.

This issue is especially important to STM because scholarly publishing is one of the clearest examples of how transparency and accountability convert research spending

³⁵ Executive Order 14332, “Improving Oversight of Federal Grantmaking,” 90 Fed. Reg. 38929, 38929–38933 (Aug. 12, 2025). <https://www.federalregister.gov/documents/2025/08/12/2025-15344/improving-oversight-of-federal-grantmaking>

into public value. STM members operate systems that make research claims visible, citable, scrutinizable, correctable, and reliable over time. Through peer review, editorial standards, disclosures, corrections, retractions, persistent identifiers, metadata, indexing, archiving, and links to underlying data, publishers provide the infrastructure that allows the public, agencies, Congress, industry, and other researchers to understand what was funded, what was produced, and whether the resulting claims can be trusted. The government has a similar responsibility to the public to understand the process by which research is funded.

Transparent FOAs and open competition are essential to ensure equal opportunity, broad participation, and merit-based selection. Limitations or exceptions to competition and announcement should be fully justified: any broad exemption raises the risk of favoritism, arbitrary decision-making, or the exclusion of deserving applicants. Broad exceptions also undermine the President's commitment to "forgotten Americans"³⁶ who may lack established relationships or other informal channels of access to government opportunities.

For that reason, the government should not weaken transparency at the front end of the research process while relying on publishers and the scholarly record to provide transparency at the back end. Open funding announcements, competitive selection, and clear award criteria are the public-sector counterpart to the transparency mechanisms that STM members support after research is conducted. Both are necessary to ensure that taxpayer-funded research is selected fairly, communicated responsibly, and available for public scrutiny.

Open notice requirements are a fundamental safeguard that allows all qualified applicants to compete on equal terms and provides the public with confidence that awards are based on merit rather than preference. Weakening these requirements runs contrary to longstanding bipartisan federal policies that link public funding to public accountability. Congress enacted the Federal Funding Accountability and Transparency Act (FFATA) and the Digital Accountability and Transparency Act (DATA Act) specifically to increase visibility into federal spending, strengthen accountability for taxpayer dollars, and ensure that federal awards are subject to public scrutiny. Similarly, government-wide performance and evidence statutes reflect the principle that public investments should be administered through transparent processes capable of demonstrating effectiveness and public value. Reducing public notice requirements moves in the opposite direction by making it more difficult for stakeholders, taxpayers, and potential applicants to understand how funding

³⁶ The White House, "President Donald J. Trump Is Ensuring Forgotten Americans Are Forgotten No More," White House Briefing Statement (Jan. 25, 2017), <https://trumpwhitehouse.archives.gov/briefings-statements/president-donald-j-trump-ensuring-forgotten-americans-forgotten-no/>

opportunities are distributed and whether federal resources are being allocated fairly and effectively.

In combination with the proposal's expanded grant termination authority, hidden or selectively announced FOAs could allow funding opportunities to be redirected, withdrawn, or reallocated with limited public visibility and reduced accountability. Such an approach is inconsistent with the fundamental distinction between federal financial assistance and procurement contracting embodied in the Federal Grant and Cooperative Agreement Act, which is premised on advancing congressionally authorized public purposes through fair competition, merit review, and transparent administration. At a minimum, any exception to public notice requirements should be narrowly defined, fully documented, and subject to meaningful oversight to ensure that transparency, accountability, and public confidence in federal grantmaking are preserved.

If OMB's proposal permits funding opportunities to be hidden or selectively announced, it would create a gap in the chain of accountability that publication cannot fully repair after the fact. The scholarly record can document and validate the outputs of funded research, but it cannot demonstrate that the opportunity to compete for that funding was offered openly, fairly, and consistently in the first place. That is why transparency in grantmaking is part of the same accountability ecosystem that makes federally funded research trustworthy and valuable to the public.

STM therefore urges OMB to withdraw the proposed § 200.204. While STM supports the announcement of all funding opportunities, including those that allow for limited competition or selection on non-competitive awards, OMB should clarify specific criteria for such FOA status and limit exceptions to posting to extreme cases.

Section Conclusion

Taken together, proposed §§ 200.340, 200.341, and 200.204 would create an environment of pervasive uncertainty and diminished transparency in federal research funding. This is diametrically opposed to the Administration's purported aims of improving program effectiveness and stability.

We strongly urge OMB to eliminate the discretionary termination clause and to preserve robust public notice requirements for all competitive grant programs. The final rule should reaffirm that only clear cases of non-compliance or statutory direction can justify terminating a grant once awarded (absent mutual consent) – an approach that protects both taxpayer investments and the integrity of the research process.

Conclusion

For the reasons described above, STM respectfully urges OMB to withdraw or substantially revise the proposed provisions that would prohibit necessary publication, subscription, conference, and dissemination costs that support peer review and research integrity; displace merit-based expert review with political or insufficiently defined criteria; restrict lawful and productive international scientific collaboration; expand discretionary termination authority; and reduce transparency in federal funding opportunities. These provisions would undermine the legal, policy, and practical foundations of the US research enterprise and would weaken, rather than strengthen, stewardship of federal funds.

STM supports efforts to improve accountability, transparency, research security, and the effective use of taxpayer resources. However, those goals are best advanced through clear standards, stable award administration, expert merit review, public dissemination of results, and transparent competition—not through broad prohibitions or discretionary authorities that would deter research communication, reduce public access to federally funded findings, and diminish US scientific leadership. STM appreciates OMB’s consideration of these comments and would welcome the opportunity to work with OMB and federal agencies to ensure that the final rule supports a strong, efficient, and globally competitive American research enterprise.

Sincerely,

A handwritten signature in dark ink, appearing to read 'Caroline Sutton', with a long, sweeping horizontal stroke extending to the right.

Caroline Sutton

Chief Executive Officer

STM