White House Office of Management and Budget (OMB) Proposed Revisions –

Regulation for Federal Financial Assistance

COMMENTING INSTRUCTIONS

1. **Please review the instructions below before commenting.** Additional information regarding submitting a public comment on federal regulations is available HERE.
2. **Make your comment unique. Do NOT use form letters or copy and paste sample language.** Comments that are not unique will not be reviewed. The most effective comments are personalized and explain how the proposed rule will affect you based on your own experiences, expertise, and perspective. Write in your own words in plain language.
3. **Explain your qualifications for commenting.** Explain why this issue matters to you personally. Consider explaining your role in the cancer and biomedical research community. You may be a cancer patient or survivor, caregiver, researcher, clinician, nurse, healthcare professional, student or trainee, patient advocate, or a concerned citizen who supports medical research.
4. **Structure your comment by listing each provision you are commenting on (i.e. 200.205).** You do not need to quote the provision directly. See list below.
5. **Choose the provisions that most concern you and state clearly what you want OMB to do.** Your comment should include examples for how the provision would affect you, researchers, patients, institutions, or the broader scientific enterprise and describe the negative impacts (Simple objections such as "this is bad" or "I disagree" are easy to dismiss). You may also discuss why a provision fails to achieve OMB's stated objectives, for example, because it reduces transparency, increases administrative burden, raises costs, delays research, or creates barriers to scientific collaboration and innovation. You may also write: "I urge OMB to withdraw this provision." or "I urge OMB not to finalize this rule."
6. **Select to comment either as an individual or anonymously.** Institutions and organizations are limited to a single response. If you belong to an institution or organization, please comment in your personal capacity and **use your personal email address**. You should also include a disclaimer such as: "I am submitting this comment in my personal capacity. The views expressed are my own and do not represent the official position of my institution/organization."
7. Submit your comment to the federal register HERE by July 13, 2026.
    - In the comment portal you may type your comment directly into the text box (5,000 character limit). You may also write your comment in a separate document and upload it as an attachment (no length limit). If uploading the comment as an attachment, use the text box for a high-level summary or simply write "see attached."

Below is a list of important relevant provisions in the proposed rule followed by a short example comment. You do not need to comment on every provision. Choose the ones that you understand and concern you most. For example, if you are a researcher who has foreign collaborations, please comment on how the proposed rule would affect you. You may also find a link to the rule HERE if you would like to read all of the provisions directly. Additional detailed resources can be found HERE.

List of provisions:

200.202 – Requires agencies apply a "domestic-first" framework and prohibits funding to international entities without approval by an agency appointee. This could make it more difficult for researchers to collaborate with international scientists or institutions in important global research partnerships, international clinical trials, and data-sharing efforts.

200.205 – Requires agencies designate one or more senior political appointees to conduct a pre-issuance review of all Federal funding and consider unclear factors such as the President's policy priorities, whether there are "anti-American values", "Gold Standard Science", and preference for institutions with lower indirect cost rates. This would shift funding decisions away from scientific merit and reduce transparency.

200.206 – Would allow agencies to consider an applicant's affiliations or memberships when evaluating grant applications. The proposal does not clearly explain how these factors would be assessed or what organizations could be considered relevant.

200.218 – Prohibits funding that would "promote or support theories that impose disparate-impact liability based on federally protected characteristics such as race, sex, or age." Could create uncertainty for research focused on cancer disparities, differences in cancer outcomes among populations, factors that contribute to unequal access to care, and other topics that agencies may interpret as covered by this provision.

200.220 – Prohibits all funding to certain foreign countries or entities. This could make it more difficult for researchers to participate in international collaborations, multinational clinical trials, and global data-sharing initiatives that help accelerate scientific discovery.

200.300 – Prohibits all federal funding related to diversity, equity, and inclusion (DEI). Uses vague language that could be interpreted in ways that restrict research on cancer disparities, access to care, and differences in outcomes among patient populations.

200.340 – Would allow agencies to terminate research grants at their discretion, even after funding has already been awarded. This means ongoing research projects, clinical trials, and long-term scientific studies could be disrupted for political reasons.

200.341 – Would require only limited explanation when grants are suspended or terminated, making it harder for researchers and the public to understand why projects lose funding.

200.342 – Would limit the ability of researchers and institutions to challenge grant terminations, reducing accountability and oversight.

200.432 – Requires agency approval and prior inclusion in award terms and conditions before federal funds can be used to attend conferences. It could make it harder for researchers to attend scientific conferences where they share findings, learn about new discoveries, and develop collaborations. Many conferences relevant to a project may not even exist when a grant is initially awarded.

200.454 – Restricts funding for memberships and subscriptions involving organizations that engage in lobbying or issue advocacy, which could restrict access to scientific societies, journals, and professional resources that researchers rely upon to stay current with advances in cancer research.

200.461 – Would make publication costs unallowable, potentially making it more difficult for researchers to publish and share federally funded research findings with patients, physicians, and the scientific community.

Example comment:

I am submitting this comment in my personal capacity. The views expressed are my own and do not represent the official position of my employer.

I am a cancer survivor and patient advocate who has personally benefited from advances made possible through federally funded cancer research. I have also seen how clinical trials and new treatments give hope to patients and families facing a cancer diagnosis. I am concerned that several provisions of this proposed rule would make it harder for researchers to conduct the work that leads to lifesaving discoveries.

- **200.205**

I am concerned that this provision would allow political appointees to play the deciding role in which research projects receive funding after they have already undergone expert scientific merit review. Research funding should be based on scientific merit, not political priorities or unclear standards that are not defined in the proposed rule. As a patient, I want the best science to move forward regardless of changes in political leadership. I urge OMB to withdraw this provision or revise it to preserve independent, merit-based review as the primary basis for funding decisions.

- **200.340**

I am concerned that this provision would allow agencies to terminate research grants after they have already been awarded if political priorities change. Cancer research often takes many years to complete, and clinical trials depend on stable funding for patients who are currently participating. Stopping grants in the middle of a project could waste taxpayer dollars that have already been invested, interrupt promising research, and delay new treatments for patients who urgently need better options. I urge OMB to withdraw this provision.

- **200.461**

I am concerned that this provision would prevent researchers from using grant funds to publish the results of federally funded research. Patients, doctors, and researchers benefit when new discoveries are shared quickly through scientific publications. If researchers cannot afford to publish their findings, important discoveries could be delayed or never reach the people who need them. This proposal also seems inconsistent with the federal government's efforts to make taxpayer-funded research publicly accessible. I urge OMB to withdraw this provision.