



July 9, 2026

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

RE: OMB-2026-0034, Office of Management and Budget (OMB) Regulation for Federal Financial Assistance.

Dear Director Vought,

The Center for Science in the Public Interest (CSPI) respectfully submits these comments on the proposal to revise several parts of the OMB Guidance for Federal Financial Assistance located in Title 2 of the Code of Federal Regulations (CFR), Subtitle A (OMB-2026-0034, Office of Management and Budget (OMB) Regulation for Federal Financial Assistance).

Founded in 1971, CSPI is an independent, evidence-based consumer advocacy organization that fights to improve the food system for all US residents. We take a multi-pronged approach to this work, both by designing and advocating for evidence-based policies, fighting for corporate and government transparency and accountability, and educating the public on the latest evidence in diet and health. CSPI accepts small research grants from the National Institutes of Health (NIH), typically as a subcontractor, only if receipt of those grants represents no conflict of interest.

Our concerns about the proposed rule are multifaceted, and include (but are not limited to) the following:

- I. The creation of unclear, politically motivated, biased standards for scientific research (§200.202, §200.204, §200.205, §200.300, §200.340)

The proposed rule stands to politicize grants by permitting political appointees to disregard the peer review process (currently captured in §200.205(d) of the proposed rule), cut funding arbitrarily mid-grant (§200.340), promote political priorities (§200.202), and conduct grant competitions in secret (§200.204).

In particular, proposed changes to §200.205 call for compliance with “administration policies, procedures, and guidance respecting Gold Standard Science,” a reference to Executive Order 14303, which lists the elements of “Gold Standard Science,” including reproducibility, transparency, etc. Importantly, neither the Executive Order nor the proposed changes make it clear how these qualities will be measured or evaluated in research proposals. The current administration’s proclivity to describe its own activities, in vaccine science in particular, as “gold standard science” underline the imprecision of the term in current use and how such a

definition can advance policies that manifestly do not meet the “gold standard science” most reputable scientists expect. Given the fact that current peer review mechanisms already allow methodological and subject-matter experts to determine the merit of a proposed project based on elements such as reproducibility and transparency, the quality of scientific research is unlikely to improve because of this change. On the other hand, introducing opaque standards makes it easier for poorly constructed proposals to be funded and provides a justification for denying scientifically strong or important research for political purposes.

In that vein, proposed revisions to §200.205 direct senior appointees to conduct reviews of grant proposals. Putting grant review in the hands of senior political appointees, rather than subject-matter experts, risks allocating grant funding to entities with political connections rather than based on scientific merit and potential public health impact. Even under existing processes, the Agency does review the results of peer review and, in narrow instances, may overrule a funding recommendation. The desire to insert these political elements into regulation is a clear signal that the administration plans to continue to inject politics into grant funding decisions.

This proposed rule continues the recent administration pattern of attempting to destabilize the grantmaking process by introducing political concerns. CSPI’s Litigation Department (along with co-counsel at the ACLU, Protect Democracy, and the Emery Celli law firm) recently litigated a successful challenge to NIH directives that instructed staff to terminate biomedical research grants based on political and ideological considerations. NIH claimed that those research studies did not “effectuate agency priorities.” Dr. Peter Lurie, CSPI’s Executive Director, was a plaintiff in that case. The court found that the directives were arbitrary and capricious and unlawful.¹

Implementation of the proposed rule also stands to vastly restrict research that allows researchers and policymakers to understand the full scope of the American experience. As stated in §200.300, federal awards must not be used to “fund, promote, encourage, subsidize, or facilitate” diversity, equity, and inclusion or diversity, equity, inclusion, and accessibility policies or practices (among other restrictions). This will prevent the scientific examination, data collection, and evaluation of the effects of longstanding structural inequities, which are major predictors of health outcomes.² If the administration is serious about reducing pediatric chronic diseases, for example, it will need to know who suffers from these conditions. Thus, the failure to collect fundamental demographic data or the intent to restrict the study of such factors will obstruct the administration’s stated goals, while widening health disparities in the future. Of course, should such disparities increase as a result of administration policies, we will be in the dark and unable to address them.

II. Blocking the dissemination of scientific findings to policymakers and the public (§200.421, §200.432, §200.461)

The rule will restrict the dissemination of scientific findings by preventing the use of federal funds to pay for many publication costs and open access fees (§200.461) and public communications and outreach (§200.421). Publication is the primary method

of disseminating scientific findings and is highly valuable both for researchers and for the public in general. But publication costs account for less than 1% of the typical grant application budget, so restricting researchers' ability to pay for publication will cut off access to science without any meaningful budgetary benefit. The rule also limits the attendance of federal award recipients at conferences by stating that "attending conferences are allowable only if participation in the conference is expressly approved by the Federal agency and included in the terms and conditions of the Federal award" (§200.432).

These proposed changes serve to isolate researchers from their peers in the scientific community, restricting critique and feedback, weakening theoretical models, and obstructing new partnerships and idea generation. Science is based on collaboration and artificially siloing researchers will restrict the scientific enterprise. Indeed, one of the great recent advances in modern science is the ability of far-flung researchers—including those in countries outside our borders—to collaborate, hastening the pace of scientific discovery.

But perhaps even more damaging is how dissemination of findings to policymakers and the public will be stymied by the proposed rule. For example, CSPI uses open access studies and attendance at conferences as the basis for developing effective policy designs in designing menu warning labels, front-of-package nutrition labels, a definition of ultra-processed food, and more. It also interacts with federally funded scientists at conferences, furthering our scientific understanding of these issues. If those studies are no longer available and if the researchers are no longer in attendance at conferences, advocates like ourselves will no longer be able to develop and recommend evidence-based policies. Downstream, this could lead to state and federal governments implementing expensive policies destined to fail because they weren't evidence-informed.

CSPI's flagship publication, *Nutrition Action*, uses the same approaches (evaluating open access studies, conference attendance, building relationships with scientific researchers) to inform its nearly 200,000 subscribers of the latest research on diet, exercise, sleep, and more. This rule serves to hamstring dissemination of evidence to individuals who are looking to make evidence-informed decisions about their health. The MAHA Strategy Report contains many proposals for educating the public on a variety of public health issues. These restrictions on evidence sharing are not consistent with those objectives.

Existing regulations already prevent the use of grant funds for public relations activities outside the scope of the grant and are sufficient to prevent abuse of federal funds. The proposed changes to §200.421 are therefore both unnecessary and dangerously restrictive and suggest that the administration is fully intent on using these unnecessary authorities to push partisan priorities.

III. Undermining efficiency and effectiveness of government programs (§200.202)

While much of this comment has focused on the implications of the proposed rule for research, the OMB proposal also reaches federal grants, cooperative agreements, and other monetary awards to nonprofits, state/local governments, and other grantees. Thus, a wide array

of concrete projects would be at risk, including some of the most important programs that help ensure food security. The proposed rule even confers upon political appointees the power to terminate a grant in the middle of implementation because it doesn't align with administration priorities (§200.202), injecting uncertainty into programs upon which millions of people rely. That makes it more difficult to hire and maintain staffing levels required for the day-to-day operations of research units as well as public health departments, including staff addressing disease surveillance, outbreak response, drug overdose prevention, and beyond. Because cuts to these programs could occur mid-cycle, the result is a public health system that could be destabilized not by evidence or need, but by shifting political winds.

Given the sweeping harm these revisions would inflict—not only on scientific inquiry but on the health and safety of the American public—we urge OMB to withdraw the proposed rule in its entirety.

Sincerely,

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