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Comment On Proposed Rule
OMB-2026-0034-0001

July 13, 2026

The Coalition for the Life Sciences (CLS; coalitionforlifesciences.org), whose members are professional societies from across the life sciences, promotes policies that foster research and training in the life sciences in the United States.

CLS recommends that proposed Rule Making OMB-2026-0034 be withdrawn, because it is deeply flawed.

Section 200.202 requires or strongly encourages research agencies to use multi-year funding in place of traditional year-by-year funding of multiple year grants.

Comment: The abrupt transition to multi-year funding starting in 2025 consumed 30% of NIH funds for new and renewed grants and contributed to more than 3,600 labs losing ongoing grants or new grants that had been recommended for funding during peer review. This caused immediate and long-term damage to research programs, graduate training programs, scientists' careers, institutions, and America's position in international science.

Section 200.205 provides for political review of discretionary grants. Peer review would remain an advisory part of the process, but political appointees will make final decisions about funding grants. Furthermore, "Agencies are not required to issue awards solely as a result of issuing a Notice of Funding Opportunity."

Comment: Capricious decisions based on political considerations rather than scientific merit will weaken our scientific enterprise, reduce the stature of American science and drive talented individuals from pursuing research in the U.S.

Section 200.205 requires that each approved award "demonstrably advance the President's policy priorities and to prioritize awards to institutions demonstrating rigorous, reproducible scholarship and research integrity by measuring performance of "Gold Standard Science," ...

Comment: Rigorous and reproducible scholarship is a top priority for scientists, and especially for those who review proposals for funding. However, this proposal would allow political appointees to make arbitrary decisions not to fund grants, because the definition of “Gold Standard Science” is unclear.

Section 200.206: Membership in organizations that “undermine public safety or national security” may disqualify applicants.

Comment: This rule would allow political appointees to block funding to organizations supporting social or cultural issues not favored by a particular administration. Disqualification of scientists for their private beliefs would violate First Amendment rights.

Section 200.220 would prohibit federally funded collaborations with researchers in designated “covered countries,” including China, Russia, and Iran except under specified circumstances which are not spelled out.

Comment: Scientific research spans the globe, so international collaborations strengthen many American research programs by providing unique datasets, technical expertise, or special instruments. Some U.S. research would be diminished or impossible without international collaborations. This rule allows arbitrary disapproval of grants that have been recommended for funding by peer review.

Sections 200.340 and 200.450 allow political appointees in funding agencies to terminate active grants at any time and for any reason. It also prohibits grant recipients from advocating for “particular social, political, or public policy positions unrelated to the award.”

Comment: Terminating peer-reviewed grants without cause will damage U.S. research. Terminating a grant because of private views of a grantee on social or political issues would violate their First Amendment rights.

Section 200.461 prohibits the use of federal funds for article processing charges and open-access fees unless specifically approved in advance by the agency as part of the award.

Comment: This rule is inconsistent with the obligation of federally funded scientists to publish their findings and make them broadly available. Most venues that publish scientific papers charge for article processing and open access. The rule is ambiguous about whether “specific approval in advance” applies to each publication or whether blanket approval would be available for the duration of the grant.

Section 200.432 requires a political appointee in a federal agency to pre-approve use of funds for travel to scientific conferences and disapproval does not require a reason.

Comment: This rule is contradictory to the government's requirement that the results of federally funded research be shared broadly and would damage training the next generation of scientists because grant funds are used to enable trainees to attend meetings. Naming trainees or conferences in advance is impossible because the trainees (who turn over rapidly) and the conferences are often unknown at the time the grant is submitted. The administrative burden of many thousands of scientists asking for prior approval to use grant funds to attend scientific conferences would overwhelm agency staff and the scientific community.

We respectfully ask that the proposed rule be abandoned and the Administration work with the scientific community on policies that would strengthen the US research and development ecosystem.