

Guidance on OMB's Proposed Changes in Regulation for Federal Financial Assistance

The White House Office of Management and Budget revealed its far-reaching plan to restructure and undermine the process for funding grants for scientific research. This plan has the potential to eliminate the independent, nonpartisan process for reviewing federal grants awarded to institutions and researchers. Instead of career scientists and experts on the National Science Foundation or National Institute of Health boards reviewing these grant applications, the Trump administration seeks to use political appointees to pick and choose which proposals qualify for funding. Any proposal or application that the appointees believe push so-called anti-American values will not receive funding.

What's at Stake

Research projects that include topics such as gender, climate change and public health are at severe risk of not receiving critical funding that would benefit the public in every state in the United States. There are few or no rules or standards as to what the appointees can reject, which will have an impact on nearly every scientific field that uses federal funding. This proposed policy could have a significant impact on colleges and universities and the academic workforce. Academic researchers, including graduate and doctoral students, postdocs, nontenure-track researchers and full-time faculty, often rely on federal funding for their research and employment. Using political appointees to review grant applications has the potential to wipe out thousands of jobs and educational programs across the higher education landscape.

Since World War II, the U.S. has led globally with scientific research because we have used nonpartisan and independent review boards filled with scientific experts in various fields. The proposed OMB standards would undermine our decadeslong global leadership in scientific research.

What It Means for Science

This proposed rule affects a broad range of scientific research:

- International scientific collaborations with foreign entities are prohibited under a “national security” lens. While there may be some risks with international collaborations, they typically bolster research and findings within scientific communities rather than harming national security. Many collaborations related to climate science, epidemiology and more have significantly benefited U.S. leadership in the scientific community.
- Active grants can be terminated for any reason at any time by political appointees. If the board finds any grants that fund research it deems to promote “anti-American values,” it has the power to end the research and stop their progress, regardless of its potential future benefits.

- Medical research, including research on lifesaving therapies for cancer, heart disease, diabetes, Alzheimer's and more, will likely face cuts and terminated grants.
- Higher education institutions will likely lose researchers and students and be required to wind down labs and programs. This is especially true of those that have already faced scrutiny and backlash from the Trump administration. Without these colleges and universities and the staff who conduct research, students and the public will lose opportunities for further career growth and scientific discoveries.
- These changes have the potential to undermine local and regional economies, including university communities with thriving research hubs and rural areas and towns with four-year regional institutions and community colleges, leading to job loss on campuses and in communities. Additionally, the rule could effectively wipe out community health initiatives created by institutions and staff, which would cause further hardship.

Where We Are and What We Can Do

The rule was proposed on May 28 and will remain a proposal until Oct. 1. Currently, OMB is accepting public comments until July 13. It is critical that we flood the system with public comments expressing our concerns. Widespread opposition to the rule could lead to several positive outcomes:

- Courts would be able to use the opposing comments in potential challenges.
- OMB could drop and/or narrow the strict standards outlined in the proposal.
- Congress will see that the rule is controversial and could fight back with legislation to counter it.

We all have the opportunity to push back on the proposed rule. Anyone, regardless of their occupation, scientific experience or education, is welcome to leave a comment.

How to Leave a Comment

1. Go to the AAUP/AFT [Stand Up for Science | Add Your Voice to Stop OMB's Attack on American Science](#) portal to add a comment.
2. Provide the required information, such as your name, address and email.
3. Leave your desired message to OMB in the box under "Message."
4. Below the message box, there is an optional space where you can identify whether you are affiliated with a specific organization; please include the name of your AFT affiliate or your AAUP chapter.
5. Once you complete the required fields, scroll down and click "Act Now!"

Last Tips

- Be sure to leave your comments by July 13 at 11:59 p.m. EDT or OMB won't recognize it.
- Do not include any sensitive information in your comments (including address, phone number, etc.) because the comments are public on the website.
- Include how this rule would affect you if passed without revisions. This could be personal or to society as a whole. Be as specific as possible. For a good example of comment writing, click [here](#).
- If desired, you may mention specific sections you want to highlight, including:
 - §200.205 — Political appointee review of grants
 - §200.340 — Grant termination
 - §200.432 — Conference attendance pre-approval
 - §200.454 — Journal subscriptions (now unallowable)
 - §200.461 — Publication costs (now unallowable)
 - §200.300 — DEI and gender ideology prohibitions
 - §200.218 — Disparate-impact research banned
 - §200.220 — Foreign collaboration prohibition
 - §200.202 — Programs must align with administration priorities
 - §200.204 — Grant competitions can be exempted from public notice

Further Reading

- [AAUP Higher Education: OMB Proposal Is the Latest Salvo in Trump's War on Science](#)
- [Union of Concerned Scientists: The Trump Administration Has Launched Its Biggest Threat Yet to Scientific Research. We Can Stop Them.](#)
- [Elizabeth Ginexi: Summary of Key Changes in OMB's Proposed Federal Financial Assistance Rule](#)
- [Elizabeth Ginexi: What We Need To Do NEXT: OMB's Proposed Federal Financial Assistance Rule \(OMB-2026-0034\)](#)
- [Inside Higher Ed: White House Aims to Establish Political Oversight of Federal Grants](#)
- [Federal Register: Regulation for Federal Financial Assistance](#)