



July 10, 2026

The Honorable Russell T. Vought
Director
Office of Management and Budget
725 17th Street NW
Washington, DC 20503

Re: OMB-2026-0034, Regulation for Federal Financial Assistance

Dear Mr. Vought,

The American Political Science Association (APSA) is writing to submit a comment to the proposed revisions to [Title 2 of the Code of Federal Regulations](#), in particular 2 CFR Part 200, the regulatory code overseeing federal financial assistance colloquially known as the "Uniform Guidance," as published on May 29, 2026, by the White House Office of Management and Budget (OMB).

APSA is a professional organization with over 11,000 members. APSA's core mission is to promote scholarly understanding of political ideas, behaviors, and institutions to inform public choices about government, politics, and public policy; and to enhance the capacity of political scientists to conduct research, improve teaching, and communicate their findings to wider publics.

Specifically, the proposed changes to the Uniform Guidance are numerous, complex, and significant in scope. They would dramatically alter the process guiding federally funded scientific research as well as all other forms of federal financial assistance. The federal government plays a critical role as a funder of innovative and evidence-based political science research. However, many of the revisions to the Uniform Guidance would have adverse consequences for researchers and would unduly burden grant recipients. This would slow U.S.-based scientific research and innovation. We urge the OMB to reconsider this proposed rule due to the detrimental impact it would have upon the peer-reviewed scientific enterprise and U.S. scientific competitiveness on a global scale.

§ 200.202 – We oppose the proposed alterations to § 200.202, the provision governing program planning and design elements of federal financial assistance. The revision to § 200.202(a) to mandate consistency and alignment of programs with "administration policies and priorities" significantly narrows the scope of science that can be funded to the handful of priorities set by the Administration. While each Administration should have the ability to set its own policy priorities, Administration officials often lack scientific expertise to determine the merit or potential value of a federal research grant. Furthermore, the addition of a paragraph in § 200.202(d) restricting eligibility of federal funds to specific nonprofit categories is far too broad and contradicts the stated goal of transparency.

§ 200.205 – We strongly oppose the proposed changes to the agency merit review process described in § 200.205. Firstly, requiring a pre-issuance review process as part of merit review imposes new regulatory burdens on seekers of federal research grants. This provision intends to "encourage agencies to broaden the

range of recipients,” yet rule changes of such sweeping scope are likely to unfairly disadvantage higher education institutions with more modest resources. Such institutions do not have the staff hours to help researchers navigate these changes and may be deterred from applying for grants, contrary to the purposes of the rule change. Secondly, the new requirements allow for the possibility for public officials or political appointees with little or no relevant scientific experience to evaluate and approve research grants regardless of the result of the merit review process. Third, benchmarks for assessing “Gold Standard Science” remain undefined and unstandardized across research agencies. Finally, the proposal reduces peer review to an advisory role, even though the peer review process already provides the benchmarks and measures the proposal seeks to develop.

§ 200.218 - Proposed revisions to § 200.218 would confuse applicants by barring federal funds from supporting disparate-impact theories based on protected characteristics. This change conflicts with the mandate for equity in Section 427 of the General Education Provisions Act (GEPA) for grants and cooperative agreements funded by USED (20 U.S.C. § 1228a(b)).

§ 200.300 - This section is overly broad and insufficiently defined. Proposed revisions to § 200.300 would prohibit federal awards from funding or facilitating DEI or DEIA activities deemed to violate federal anti-discrimination laws. Although the revisions refer only to “unlawful DEI” and are narrower than the July 2025 DOJ guidance, they rely on examples from that guidance that have faced repeated legal challenges. Combined with agency-by-agency interpretations of federal civil rights law, this vagueness will make it difficult for funding recipients to determine which activities could place their awards at risk.

We request the OMB remove the proposed changes to §§ 200.218 and 200.300 of 2 CFR Part 200 and maintain the current language requiring federal agencies to “manage and administer the Federal award in a manner so as to ensure that Federal funding is expended and associated programs are implemented in full accordance with the U.S. Constitution” and “applicable Federal statutes and regulations.” Contrary to the stated intent, the proposed revisions reduce transparency, accountability, and oversight; create regulatory confusion; and increase the regulatory burden on award recipients.

§ 200.340 – This provision proposes that active grants can be terminated at any time for any reason. However, grants only retain value if they are allowed to be carried out in full. Cancellations of grants are inefficient and create government waste. The termination of grants increases uncertainty for institutions, PIs, staff, and student workers. Terminating grants destroys jobs and negatively [impacts](#) organizations’ creditworthiness. Termination should be decided by scientific peers. The proposed decision-making role of political appointees who lack subject matter expertise only adds uncertainty and an undue burden to research institutions and workers.

§ 200.432 - We oppose § 200.432 requiring expressed pre-approval for recipients of federal funds to attend professional conferences. Conference attendance is essential for professional development, peer collaboration, and advancement of the scientific enterprise. Under the proposed rule, scientists would have no reliable way to share findings with academic peers. Additionally, there is no transparency around the pre-approval process, no timeline for receiving pre-approval, no clarity on criteria that will be used to allow or deny conference attendance, and no process for appealing denials. The requirement of pre-approval for recipients of federal funds to attend professional conferences adds another unnecessary regulatory burden that may prevent federally funded researchers from building effectively upon their research experience. It contradicts the Administration’s stated policies of pursuing Gold Standard Science.

§ 200.220 - We strongly oppose revision to § 200.220 restricting federal funds on direct programmatic activities (such as research, technical assistance, data-sharing, travel, or indirect costs) with “covered foreign countries” unless expressly authorized by federal statute or federal agency head. International collaboration

in areas integral to the U.S. including security, medicine, and technology are pillars of diplomatic engagement and scientific innovation. Introducing repetitive bureaucratic hurdles for American scientists to collaborate will freeze Americans out of international research projects and will frustrate the President's stated goals regarding American innovation in [Executive Order 14413](#) and [14363](#).

§ 200.454 – We oppose the revision to § 200.454 calling for a ban on federal funds being used by grant recipients for “subscriptions to business, professional, academic, and technical periodicals”. These types of publications are the backbone of scholarly research dissemination. For many federal grant recipients (and especially those with modest resources), it could become genuinely difficult to conduct research without access to some subscription journals. It is also difficult to reconcile with § 200.461, which seeks to end funding for publishing Open Access. Without Open Access, subscription journals are more important than ever to federally funded researchers.

§ 200.461 - We oppose the proposed revision to § 200.461 of 2 CFR Part 200, which would make article processing charges (APCs) and other publication costs unallowable under federal awards except in cases where it is required by statute or approved in advance. This provision creates a direct conflict with directives that started with the proposed 2019 Executive Order on Open Access, the 2022 Ensuring Free, Immediate, and Equitable Access to Federally Funded Research Policy, and the NSF Policy Notice: Implementation of Policy Changes to Proposal and Award Policies and Procedures Guide (PAPPG) 24-1, Supplement 2, all of which have moved the government towards mandating that federally funded researchers publish Open Access without embargo. For most journals, that requirement means paying an APC. We urge OMB to not impose such an unfunded mandate on taxpaying researchers and to withdraw § 200.454 and § 200.461 and to resolve the conflict with federal public access policies and subscription policies before finalizing any restriction on publication costs.

In addition to our comments on the provisions above, we also have concerns about the Regulatory Impact Analysis (RIA). The OMB's RIA states that “the benefits of the proposed rule remain unquantified,” and “OMB was unable to quantify the expected costs of this rule” (RIA, 17). Yet OMB also states that it expects costs for both the federal government and recipients to be minimal (RIA, 17). If OMB expects the costs to be minimal, then it should have been possible to quantify and monetize what those costs would be for all parties. OMB has almost certainly underestimated the regulatory waste, uncertainty, job loss, and long-term degradation to US scientific prowess that will result from this proposal. We urge OMB to review public comments providing details about the costs and benefits of the proposed rule and revise this rulemaking with a complete, detailed RIA to justify its proposed changes.

Sincerely,
The American Political Science Association (APSA)