July 13, 2026

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

Re: OMB-2026-0034-0001 Regulation for Federal Financial Assistance

Dear Director Vought:

The United States Association for the Study of Pain (USASP) appreciates the opportunity to comment on the Office of Management and Budget's proposed rule, *Regulation for Federal Financial Assistance* (OMB-2026-0034).

Advancing biomedical research is itself in the national interest. Pain affects millions of Americans, is a leading cause of disability, and imposes substantial human and economic costs (exceeding half a trillion dollars annually), making continued investment in pain research an important national priority. Federal investments in pain research improve health, strengthen the workforce, reduce healthcare costs, and improve the lives of millions of Americans living with pain.

USASP is a multidisciplinary professional association representing researchers, health care professionals, advocates, trainees, and people with lived experience of pain.

We support the proposed revisions that improve the clarity, accessibility, and predictability of Notices of Funding Opportunity (NOFOs) because they strengthen transparency and reduce unnecessary administrative burden while building upon an already rigorous framework of scientific, financial, ethical, and programmatic oversight. **However, USASP opposes several other provisions as drafted.** Rather than strengthening accountability and stewardship, these provisions would duplicate existing oversight, expand political or administrative influence over merit-based funding decisions, destabilize research funding, restrict scientific dissemination, and unnecessarily limit legitimate scientific collaboration. We respectfully urge OMB to retain the proposed improvements to §200.204 while revising or not finalizing the provisions identified below.

In Summary, USASP:

- Supports the proposed revisions to **§200.204** that improve the clarity, accessibility, and predictability of Notices of Funding Opportunity.
- Opposes the proposed revisions to **§§200.205–200.206** that expand political review and applicant risk criteria based on broadly defined organizational affiliations.
- Opposes the elimination of fixed amount awards in **§200.201.**
- Opposes the use of negotiated indirect cost rates as an indicator of institutional quality or stewardship in **§200.333.**
- Opposes the proposed revisions to **§200.300** that introduce ambiguous and non-evidence-based funding conditions.
- Opposes the proposed expansion of termination authority in **§§200.340–200.343**.
- Opposes proposed restrictions on scientific dissemination under **§§200.432, 200.454, and 200.461.**
- Opposes broad restrictions on legitimate international scientific collaboration under **§§200.220, 200.329, 200.331, and 200.332.**

We elaborate on our concerns below.

We Support Improvements to Funding Opportunities (§200.204). USASP supports the proposed revisions to §200.204 requiring public announcement of discretionary funding opportunities, the use of plain-language NOFOs, predictable application timelines, greater accessibility for first-time applicants, and standardized application processes through Grants.gov. Together, these changes improve transparency, reduce unnecessary administrative burden, and make federal funding opportunities more accessible to researchers at all career stages. If agencies adopt Statements of Interest, they should complement—not replace—rigorous scientific peer review and should not inadvertently disadvantage innovative, interdisciplinary, or early-stage investigators.

We Urge OMB and the Federal Agencies Not to Finalize Several Proposed Revisions:

Do Not Finalize the Proposed Revisions to Independent Peer Review (§§200.205–200.206). The proposed revisions would expand political review of funding decisions by requiring additional pre-issuance review by senior political appointees and permitting applicant evaluations based on broadly defined organizational affiliations. **Independent scientific peer review has long been the gold standard for responsible stewardship of federal funds because proposals are evaluated through an unbiased, evidence-based assessment of scientific merit, feasibility, innovation, and potential impact.** Political review would instead inject political considerations into funding decisions, compromising the integrity and credibility of the review process. Many of the most important scientific advances emerge from unexpected discoveries

and long-term investments that do not always align with changing administrative priorities. Expanding political review beyond the longstanding merit-review framework risks discouraging innovative, high-risk research while creating unnecessary uncertainty across the research enterprise. In addition, expanding political review of scientific awards is inconsistent with the Uniform Guidance's stated objectives of promoting sound financial management, reducing administrative burden, and strengthening accountability. The proposed rule does not demonstrate that the existing merit-review framework is insufficient to achieve those objectives.

USASP also opposes the proposed expansion of applicant risk criteria to include broadly defined organizational affiliations. Professional scientific societies are essential components of the federal research enterprise, fostering collaboration, mentoring investigators, disseminating evidence, and supporting rigorous peer review. Organizational membership or affiliation is not an evidence-based indicator of research integrity, financial stewardship, or grant performance and should not be used as a proxy for applicant risk. Applicant evaluations should instead remain focused on objective measures of scientific merit, research integrity, prior performance, and responsible stewardship of federal funds.

Do Not Eliminate Fixed Amount Awards (§200.201). USASP supports OMB's goal of improving transparency and accountability in federal financial assistance. However, eliminating fixed-amount awards and fixed-amount subawards entirely may unnecessarily reduce flexibility for research programs where these mechanisms have been used appropriately and with adequate oversight. These additional restrictions would limit investigators' ability to manage complex research projects effectively, despite the reality that scientific discovery often requires adaptive implementation to ensure rigorous and successful outcomes. Rather than eliminating these award mechanisms, OMB should strengthen government-wide standards governing their use while preserving flexibility when they are appropriate for the objectives of a particular program.

Do Not Use Negotiated Indirect Cost Rates as an Indicator of Institutional Quality or Stewardship (§200.333). Negotiated Facilities and Administrative (F&A) rates are already established through rigorous federal review and are intended to reimburse the legitimate costs of conducting federally funded research. They are not evidence-based indicators of scientific merit, research integrity, or responsible stewardship and should not be used, explicitly or implicitly, to influence funding decisions.

Do Not Finalize the Proposed Revisions to §200.300 that Introduce Ambiguous and Non-Evidence-Based Funding Conditions. Federal grant administration should continue to rely on objective, evidence-based standards that are directly related to research integrity, financial stewardship, legal compliance, and successful program performance. Existing federal laws

already prohibit unlawful discrimination, and recipients of federal funding are already required to comply with those requirements. Additional funding conditions should therefore be narrowly defined, objectively measurable, and directly related to the statutory purposes of the federal award. The proposed revisions introduce broadly framed policy conditions that are not clearly tied to established indicators of grant risk or research performance and could result in inconsistent implementation across agencies. Ambiguous or undefined terms create uncertainty for applicants and recipients, increase administrative burden, and reduce the predictability that investigators and institutions rely upon when accepting and administering federal awards.

USASP is also concerned that broadly defined funding conditions could create uncertainty for federally authorized research and community-engagement activities designed to address health disparities or improve access for historically underserved populations when those activities are otherwise lawful and consistent with congressional authorization for the underlying research program. Federal funding conditions should be sufficiently clear that applicants can reasonably understand what conduct is required or prohibited before accepting an award and should remain directly tied to objective, evidence-based standards and the statutory purposes established by Congress.

Do Not Finalize the Proposed Expansion of Termination Authority (§§200.340–200.343). The proposed expansion of termination authority creates the potential for abrupt termination of scientifically meritorious, compliant projects, thus jeopardizing years of scientific investment, disrupting patient participation, interrupting trainee development, and reducing the return on federal research investments. Biomedical research grants differ fundamentally from federal procurement contracts. Biomedical research depends on sustained investment in longitudinal studies, clinical trials, workforce development, data infrastructure, and community-engaged partnerships that often span many years. Graduate students, postdoctoral fellows, and early-career investigators make multi-year career decisions based on the expectation of stable funding and sustained mentorship. Rather than improving stewardship of federal resources, these provisions risk weakening the research workforce, reducing long-term return on federal investments, and slowing discoveries that improve health and reduce suffering.

Abrupt termination authority also undermines the predictability required for agencies and recipient institutions to fulfill their obligations under NIH's authorizing statutes, the Public Health Service Act, and federal ethics requirements governing human subject research. Beyond disrupting ongoing research, sudden grant terminations impose significant operational, financial, and legal burdens on recipient institutions, which must manage workforce reductions in compliance with applicable federal and state labor laws while addressing ongoing commitments to research participants, collaborators, and trainees. These disruptions increase

administrative costs, expose institutions to potential legal liability, and ultimately diminish the return on taxpayers' investment in federally funded research.

Do Not Finalize the Proposed Restrictions on Scientific Dissemination (§§200.432, 200.454, 200.461). Scientific meetings are essential research infrastructure. USASP's Annual Scientific Meeting brings together researchers, clinicians, trainees, federal partners, industry, and people with lived experience to disseminate federally funded discoveries, establish collaborations, and accelerate the translation of discoveries into patient care. Attendance at scientific meetings is frequently anticipated and justified in grant proposals, with associated travel and dissemination costs reviewed and approved as part of the peer-review and funding process. Requiring additional prior approval for conference participation after an award has already been made creates unnecessary administrative burden for investigators and agencies, delays the dissemination of federally funded research, and provides little additional oversight beyond the existing grant review process. Moreover, restrictions on conference participation would disproportionately affect trainees and early-career investigators, who rely on scientific meetings to establish collaborations, receive expert feedback, identify mentors, and launch independent careers. For nonprofit scientific societies, uncertainty surrounding conference participation would also impair meeting planning and financial sustainability, ultimately weakening the research infrastructure that supports dissemination, collaboration, workforce development, and scientific innovation. Publication is not an ancillary cost; it is the mechanism through which federally funded discoveries become evidence that can be evaluated, replicated, and translated into practice. USASP recognizes that publication and dissemination are fundamental components of the scientific process and should remain allowable and supported activities. Restricting publication, professional society participation, or scientific meetings would diminish the public return on federal research investments by limiting the dissemination, evaluation, and translation of federally funded discoveries.

Do Not Finalize the Proposed Restrictions on Legitimate International Scientific Collaboration (§§200.220, 200.329, 200.331, and 200.332). Scientific collaboration has long advanced the national interest by strengthening U.S. leadership in biomedical research, accelerating innovation, and improving health outcomes. USASP supports appropriate safeguards to protect research security. However, this rule proposes broad restrictions on international collaboration that would unnecessarily isolate American researchers, reduce scientific competitiveness, and delay discoveries that benefit millions of Americans living with pain. Research security and scientific collaboration are not mutually exclusive, and targeted, evidence-based safeguards can protect both. We urge OMB to instead use targeted, evidence-based safeguards that protect research security without isolating American researchers.

In conclusion, the federal research enterprise has earned global leadership through independent peer review, objective grant administration, stable funding, open scientific exchange, and timely dissemination of research findings. These principles are themselves mechanisms of accountability and responsible stewardship of taxpayer resources. USASP respectfully urges OMB to retain the proposed revisions that improve transparency, accessibility, and predictability while not finalizing those provisions that would introduce political or administrative considerations unrelated to scientific merit, duplicate existing oversight, restrict scientific collaboration and dissemination, or undermine the stability required for long-term biomedical research. Preserving an objective, evidence-based framework for federal research funding is essential to fostering innovation, protecting public trust, strengthening the biomedical workforce, and ensuring that federal investments continue to improve health, reduce suffering, and deliver lasting value to the American public.

Respectfully submitted,



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