

AVAC Comment Submission on the White House Office of Management and Budget (OMB) Proposed Federal Financial Assistance Rule

As an advocate for scientific integrity, public health and open inquiry, AVAC strongly opposes OMB's proposed Regulation for Federal Financial Assistance. The rule would politicize grantmaking, dismantle merit-based peer review and severely restrict professional infrastructure necessary for quality research. Specific concerns and requested changes include:

I. Political Appointees Take Control of Grant Awards (200.205): Requiring political appointees to conduct mandatory “pre-issuance review” of discretionary grants and barring deference to peer review risks turning merit-based decisions into political ones, which will stifle innovation. Request: Repeal requirement for mandatory pre-issuance review by political appointees.

II. Peer Review Is No Longer Binding (200.205(d)): Stating that peer review “remain advisory” is unacceptable. Request: Restore deference to documented peer-review rankings, require a written justification for any deviations and create independent appeals mechanism.

III. “Gold Standard Science” as an Undefined Political Test (200.205): An undefined “Gold Standard Science” test grants broad discretion to exclude projects on subjective political grounds. Request: Remove the term or define it with objective, discipline-appropriate, measurable criteria developed with scientific stakeholders and subject to notice-and-comment.

IV. Active Grants Can Be Terminated at Any Time (200.340): Allowing mid-award termination for being “inconsistent with program goals or agency priorities,” with only a brief rationale, threatens multi-year studies, clinical trials, and longitudinal projects. Request: Limit termination to documented noncompliance, fraud, or waste, and require notice, opportunity to cure, and a transition plan to protect participants and data.

V. DEI, Gender Research, and Related Topics Banned as Grant Conditions (200.300): Barring funds for DEIA activities, so-called “gender ideology” and assistance with gender transition for people under 19, and allowing termination based on an institution's separate, nonfederal activities, would politicize grantmaking and target grants for ideological rather than scientific reasons. It would harm vulnerable populations by suppressing research and services related to discrimination, mental health and gender identity, undermining evidence-based public health. Request: Strike bans and reaffirm neutral standards: scientific rigor, ethics, and compliance with civil-rights and human-subjects protections.

VI. International Collaboration and “Domestic-First” Framework (200.220; 200.202(e)):

Broad prohibitions on collaboration with covered foreign countries and domestic-first presumption will curtail global partnerships crucial for health, environmental, and translational research. Request: Narrow restrictions to targeted, risk-based measures tied to specific national-security concerns, preserve international collaboration, and require documented case-by-case risk assessments.

VII. Applicants Denied Based on Organizational “Affiliations” (200.206): Expanding risk factors to include organizational “affiliations” that allegedly “advocate for the overthrow of the USG” or “undermine public safety or national security” risks excluding legitimate public-interest and academic organizations. Request: Define “affiliation” narrowly, require clear evidence of illicit or hostile conduct and include safeguards: notice, opportunity to rebut, and independent review.

VIII. Conferences, Memberships, and Publication Costs (200.432, 200.454, 200.461): Requiring advance approval for conferences, treating subscriptions as unallowable, and restricting publication and open-access fees would isolate researchers, hinder dissemination, and conflict with federal open-access policy. Request: Restore allowability of reasonable conference, membership, subscription, and open-access costs consistent with OSTP policy and avoid broad limits on public communication of results.

IX. New “Issue Advocacy” Prohibition (200.450): In a rule whose preamble labels climate science, public health, and equity research as “divisive ideologies,” barring any messaging that could be seen as taking a “social, political, or public policy position” will stifle scientists from explaining findings on policy-relevant topics. Request: Distinguish impermissible partisan activity from legitimate communication and substantially narrow or remove the Section.