



Science.
Compassion.
People Power.

Defend Public Health, a 12,000 member organization, is in complete opposition to the entirety of the proposed rule entitled *Regulation for Federal Financial Assistance* (OMB-2026-0034).

The current administration has already seriously harmed American scientific research infrastructure, beginning with the departure of an estimated 20,000 scientists and support staff across the Department of Health and Human Services (HHS), including from the National Institutes of Health (NIH), the Centers for Disease Control and Prevention (CDC), and the Food and Drug Administration (FDA), as well as outside HHS at the National Science Foundation (NSF). Further, funding for scientific grants to researchers at colleges and universities has dropped precipitously since 2024. The OMB rule adds more chaos to grant administration, replacing expert peer review of the scientific merit of grants with the judgment of political appointees. These appointees are empowered to not only refuse funding for grants deemed by experts to address critical scientific gaps, but also to terminate current grants on a political, not a scientific, basis.

Specific sections of the OMB ruling DPH opposes:

Sections §200.205 (Political appointee review of grants), §200.340 (Grant termination) and §200.202 (Programs must align with administration priorities)

Project 2025 attempted to make the federal funding process, particularly for the NIH, sound like a giveaway controlled by a few individuals. This is incredibly inaccurate. Expert scientists meet to review applications designed according to strict guidelines. At NIH, proposals are assigned to a scientific review panel made up of highly qualified peers who evaluate the application. Proposals are critically reviewed, and a decision is made regarding whether the research will have a significant impact on health, and if the scientific methods are appropriate. Political agendas do not belong in this process.

The best people to evaluate grant applications are experts who work in the field. They can effectively judge whether the proposals are sound and rigorous. Peer review also prevents corruption; reviewers can have no association with the applicants, thus preventing a reviewer from benefiting a collaborator or a company. The administrations of 15 American presidents, Republicans and Democrats, have accepted peer review. Until now.

The proposed rule (§200.205) will put funding decisions in the hands of political appointees instead of experts, thus undermining the recommendations of scientists and leaving political actors as the final arbiters of what is “good” science and what is not. Worse, under the proposed rule (§200.340), grants that have already been reviewed and awarded funding may be terminated at any time by political appointees if they deem the work to be outside the administration’s political agenda (§200.202). This would waste all of the work completed prior to the termination, and deprive Americans of potential lifesaving biomedical discoveries.

Sections §200.432 (Conference attendance pre-approval), §200.454 (Journal subscriptions now unallowable) and §200.461 (Publication costs now unallowable)

Through the proposed rule, the administration is erecting barriers to academic freedom as well as barriers to providing the public with information about new research discoveries (§200.432; §200.454; §200.461). Publishing the results of the work in peer-reviewed journals or presenting them at conferences are critical for the advancement of scientific knowledge. Because scientific journals require researchers to pay publication costs, disallowing these costs (§200.461) will destroy the ability to present results to the public—the very taxpayers who funded the work in the first place. Forbidding journal subscriptions (§200.454) is a senseless obstacle to researchers being able to access and keep up to date with work that is being done throughout the field. Demanding that scientists seek pre-approval for conference attendance (§200.432) is an additional hindrance that affects a research team’s ability to both learn about others’ research and to present their own results.

Sections §200.300 (DEI and gender ideology prohibitions) and §200.218 (Disparate-impact research banned)

Experts agree that diversity, equity and inclusion are critical for scientific research, and that there are major, unaddressed health disparities that impact the health of the people of the United States. Already, artificial intelligence piloted by wholly unqualified political appointees has been used to defund 2300 grants at NIH; grants that panels of experts had already agreed were critical to improving the health of the American people. The draconian effects of these decisions have already been observed, with the number of Black and Hispanic trainees having plummeted by 40% and 33%, respectively, between 2024 and 2025. The future of science has already been put at risk by these actions. It will only get worse if these rules are upheld.