



July 10, 2026

Russell Vought, Director
Office of Management and Budget
Executive Office of the President
725 17th Street NW
Washington, DC 20503

Re: Comments on OMB-2026-0034-0001: Proposed Revisions to Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (May 29, 2026)

Dear Director Vought,

The Society for Neuroscience (SfN), the world's largest organization dedicated to advancing the understanding of the brain and central nervous system, strongly opposes the proposed Office of Management and Budget (OMB) rule entitled Regulation for Federal Financial Assistance and requests that it be withdrawn.

SfN is committed to advancing biomedical research that drives innovation, improves public health, and maintains the United States' global leadership in scientific discovery. While we support OMB's stated goals of promoting transparency, oversight, accountability, and reducing administrative burden, the proposal as written will impede those objectives. The proposal shifts emphasis away from rigorous, merit-based peer review and evaluation, an approach that has historically enabled transformative research and major discoveries in brain function and neurological disease.

By introducing politically driven criteria, the proposal risks disrupting the careful, evidence-based prioritization process that underpins scientific progress. The added layers of complex and less transparent review mechanisms, coupled with new administrative requirements, will divert valuable time and resources away from research itself, slowing discovery. Although this letter focuses on the significant consequences for grants within the Department of Health and Human Services (HHS), the concerns we raise extend across the broader federal research ecosystem, hindering advances that are critical to understanding and improving the health and well-being of the American people.

Our urgent concerns are outlined below, organized by specific sections of the proposed rule.

**Subpart C—Pre-Federal Award Requirements and Contents of Federal Awards
Section 200.201—Use of Grants, Cooperative Agreements, and Contracts**

SfN respectfully opposes the proposed elimination of fixed amount awards [Section 200.201]. OMB's stated concern is that fixed amount awards may limit transparency and hinder oversight. This concern does not reflect how scientific accountability operates in practice. Accountability is strengthened when awards are tied to concrete outputs, including validated methods, shared research resources, or high-quality datasets. Cost-based reimbursements do not inherently ensure scientific rigor or productivity, and an exclusive reliance on such a mechanism will shift attention toward administrative compliance and away from research outcomes.

SfN notes that scientists and research institutions are concerned that eliminating fixed amount awards discourages participation in smaller or exploratory projects while it increases administrative burden. Fixed amount awards reduce time spent on detailed financial reporting and allow investigators to focus on execution of scientific work, particularly in early-stage or proof-of-concept work. Their removal will disproportionately affect early-career investigators, smaller institutions, and high-risk, high-reward projects that are less suited to traditional cost-reimbursement frameworks.

Finally, eliminating fixed amount awards will weaken U.S. scientific competitiveness. Increasing reliance on administratively intensive funding mechanisms slows the pace of discovery, reduces the number of projects supported within constrained budgets, and creates barriers to entry for innovative or nontraditional research efforts. In a field as dynamic as neuroscience, this loss of flexibility will diminish U.S. leadership in biomedical research. For these reasons, SfN urges OMB to withdraw the proposed elimination of fixed amount awards.

Section 200.202—Program Planning and Design

SfN respectfully opposes the requirement that goals and objectives of grant proposals aim to achieve meaningful results aligned with administration policies and priorities [Section 200.202]. In the proposed rule, the term “meaningful” is not defined, which introduces ambiguity into program design and evaluation. In scientific research, the significance of findings is often context-dependent, evolving over time, and not readily measurable at the outset of a project.

Breakthroughs in neuroscience are built on many individual discoveries that are often only recognized as critical in retrospect. Developing treatments for Parkinson's disease, brain injury, and pain all depended on research from many groups and involved many different disciplines. Imposing an undefined and potentially subjective criterion in research proposals risks disadvantaging innovative and rigorous research that does not align with immediate or easily articulated outcomes. Those charged with reviewing grants under this standard may not have the subject-matter expertise necessary to assess the “meaningfulness” of proposed scientific questions or anticipated findings, particularly in highly specialized fields such as neuroscience.

SfN is particularly concerned that aligning program goals too closely with administration priorities could narrow the scope of federally supported science and discourage investigator-driven inquiry. Work on neurodevelopment, neurodegeneration, and brain function has led to major advances in understanding Alzheimer's disease, Parkinson's disease, stroke, mental health, and other neurological conditions – often years or decades after initial discoveries. Neuroscience has repeatedly demonstrated that transformative advances arise from foundational research that was not pursued based on short-term policy relevance but based on fundamental questions about the brain and nervous system. If federal program design is directed too tightly by changing administration priorities, the result will be a less stable and innovative research environment.

Section 200.202 also encourages the use of multi-year awards for funding research projects. Multi-year funding mechanisms, while appropriate in certain contexts, are not a substitute for single-year awards, and may introduce challenges for the research community if prioritized too strongly in program design. Multi-year awards reduce flexibility by committing funds to specific projects over longer time periods, limiting the ability of agencies to respond to emerging discoveries, shifting research priorities, or unexpected results. In rapidly evolving fields such as neuroscience, new findings can redirect the course of inquiry, and shorter funding cycles allow both investigators and agencies to adapt more effectively. Single-year awards also play an important role in supporting exploratory research and early-stage investigations that may not yet justify longer-term commitments but are essential for generating preliminary data and testing novel ideas. Emphasis on multi-year funding will constrain the dynamism of the research ecosystem, reduce opportunities for new entrants, and slow the iterative process that drives scientific research. For these reasons, single-year awards remain an important component of a balanced and responsive federal research portfolio.

This proposed revision also risks reducing U.S. competitiveness by making federal research programs less predictable and less supportive of frontier science. Competitor nations, including China, continue to invest heavily in basic and translational research because they understand that discovery drives biomedical innovation, workforce development, and economic growth.

The U.S. has historically led the world in research in part because of sustained federal support. SfN urges OMB not to adopt this revision because it will constrain the scientific independence and long-term competitiveness of the U.S. research enterprise.

Section 200.205—Federal Agency Review of Merit of Proposals; 200.206—Federal Agency Review of Risk Posed by Applicants

SfN respectfully opposes the requirement for political review prior to award issuance [Sections 200.205, 200.206]. This requirement will introduce variability into funding decisions, as presidential priorities shift across administrations. This approach will create uncertainty for applicants and disrupt the continuity necessary for long-term scientific

research through the changing of grant prioritization by different administrations. The pursuit of rigorous science should remain unchanged across administrations, and the role of career civil servants in the review process should remain at the forefront. The proposed changes will diminish the role of career civil servants, whose technical expertise is essential to merit-based evaluation of grants. Subjective grantmaking based on presidential priorities rather than scientific merit is a significant departure from the way the research enterprise currently operates. Federal grantmaking depends on objective, subject-matter-expert review. Adding a layer of political oversight will erode confidence in the timeliness and rigor of the grantmaking process.

In addition, centralizing review authority among a limited number of senior political appointees will create administrative bottlenecks and delay award timelines. These delays will impede research initiation and continuity, slow scientific progress, and weaken U.S. global competitiveness. The continuity of research remains essential, and slowing research due to a centralizing of review with political appointees means delaying treatments and cures for millions of Americans dealing with neurological diseases and disorders including Alzheimer's disease, Parkinson's disease, addiction, and other mental illnesses.

Finally, the "risk" assessment requirements in section 200.206 are defined in broad and ambiguous terms. Without clear, standardized criteria, these provisions will be applied inconsistently across agencies and programs, raising concerns about unequal treatment and reduced transparency. This lack of a transparent definition can lead to questions about the rigor of the review process, and cause grants to be unfairly cancelled due to ambiguous criteria. Unjustly cancelled grants will additionally lead to delays in treatments and cures that could improve the lives of millions of Americans.

SfN urges OMB to reconsider their proposal and withdraw the policies outlined in sections 200.205 and 200.206, which introduce instability, uncertainty, and subjectivity to the research grant review process. Providing continuity for research, which often spans presidential administrations, helps ensure stability in the research enterprise and enables an unbroken flow of discovery, new treatments, and cures.

Section 200.211—Information Contained in the Federal Award

SfN respectfully opposes grant termination in the absence of clear and specific criteria [Section 200.211; see also 200.340-343]. The authority to terminate grants without defined criteria leaves principal investigators without guidance on the conditions that may trigger cancellation. This uncertainty defeats research planning and weakens confidence in federal funding commitments. Research is often a long, multi-year process. Cancelling grants amid the discovery phase will result in lost research and could force the layoff of technical experts. This authority risks disrupting ongoing investigation, resulting in lost knowledge and delays in discovering and developing treatments and cures. Abrupt cancellations will harm neuroscience research, which depends on sustained investment.

These impacts will fall disproportionately on trainees and early-career scientists, who are particularly vulnerable to funding disruptions. Trainees and early-career scientists are often the first to be laid off following a loss of funding, and graduate students rely on research positions on grants to advance their expertise to continue the cycle of discovery to improve human health. Increased uncertainty will deter continued participation in the research workforce. Funding instability has already contributed to trainees leaving the field, raising concerns about the future pipeline of U.S. scientists and our continued global scientific leadership.

SfN urges OMB to not adopt the policy of broad grant terminations as outlined in Section 200.211 due to the impacts it will have on long-term research, confidence in the review process, transparency, and trainees. Losing the next generation of great scientists in the U.S. due to instability and uncertainty will have devastating consequences on innovation and discovery for decades to come.

Section 200.220—Prohibition of Using Federal Funds for Covered Foreign Collaborations

SfN respectfully opposes broad prohibition of the use of federal funds for collaboration with covered foreign countries or entities [Section 200.220]. International collaboration is central to maintaining U.S. leadership in biomedical research. These partnerships facilitate the exchange of expertise and resources that drive scientific discovery and accelerate the development of treatments and cures. Broad restrictions on collaboration risks isolating U.S. researchers and slowing innovation by duplicating efforts that may be happening elsewhere in the world. Sharing knowledge with all members of the global research community and avoiding the unnecessary duplication of efforts can lead to the faster development of treatments and cures for Americans dealing with neurological diseases and disorders.

The prohibition of use of federal funds for collaboration with foreign countries will also hinder recruitment and retention of top global scientific talent. Currently, the U.S. is considered the global leader in scientific research, and because of that, can attract the best scientists from across the globe. The competitiveness the U.S. offers the global research community is essential to hiring and retaining this international talent. Restricting where this global talent can be recruited from will prevent the U.S. from succeeding in employing the best minds worldwide. The U.S. research enterprise depends on attracting leading researchers; restricting collaboration will deter talent and weaken domestic capacity.

SfN strongly urges OMB to allow international collaboration under the current framework and guidance, to ensure the U.S. remains a competitive leader in the global research community. This will enable the U.S. to continue to attract and retain the best scientific minds in the world. The policies outlined in Section 200.220 will unseat the U.S. as the

global leader in science and medicine and slow down progress for treatments and cures that will improve the lives of millions of Americans.

Subpart D—Post Federal Award Requirements

Section 200.333—Fixed Amount Subawards

SfN respectfully opposes the proposed elimination of fixed amount awards outlined in Subpart C of Section 200.201 as well as Subpart D of Section 200.333 that will reduce flexibility, increase administrative burden, and ultimately slow the pace of scientific discovery. Fixed amount awards are a limited but important tool used by NIH and other federal agencies to support well-defined, discrete research activities. Eliminating this mechanism will have unintended negative consequences for neuroscience research and the broader biomedical enterprise.

Neuroscience research often involves clearly defined projects where costs can be reasonably estimated in advance. In this research, fixed amount awards enable efficient project execution by allowing investigators to focus on the work and outcomes rather than continuous cost adjustments. Fixed amount awards support innovation and early-stage research by lowering administrative barriers for basic research projects. These awards provide predictability for both institutions and investigators managing complex research portfolios.

Eliminating fixed amount awards will increase administrative burden because detailed cost tracking, documentation, and reporting requirements will expand significantly. Institutional grants offices will face higher compliance costs and staffing demands. Additionally, investigators will need to divert time from research to administrative management. These burdens disproportionately affect smaller labs, early-career investigators, and institutions with fewer administrative resources.

Additionally, neuroscience research is inherently uncertain and fixed amount awards provide flexibility to adjust approaches within a defined budget as scientific understanding and discovery evolve. Eliminating them will restrict investigators' ability to pivot methods or reallocate resources as needed. Eliminating fixed cost awards will also discourage efficient use of funds when savings could otherwise be redirected toward achieving project goals.

Finally, scientific progress will be slowed by this change because the added compliance requirements and reduced flexibility will delay project initiation and completion timelines and discourage pursuit of high-risk, high-reward studies. This is particularly concerning in neuroscience, where rapid advances depend on experimentation and flexibility in research practices.

SfN strongly urges OMB to retain agency discretion to use fixed amount awards where appropriate, rather than eliminating this option entirely. The proposed elimination of fixed

amount awards under Subpart C of Section 200.201 and Subpart D of Section 200.333, will impose significant administrative burdens, reduce flexibility, and hinder efficient scientific research particularly in fields like neuroscience where project scopes are often well suited to this funding mechanism. Retaining this tool is essential to supporting innovation, efficiency, and equitable access to federal research funding.

Section 200.340—Termination and Suspension; 200.341—Notification of Termination Requirement; 200.342—Opportunities to Object, Hearings, and Appeals; 200.343—Effects of Suspension and Termination

SfN respectfully opposes the proposed revisions to Subpart D of Sections 200.340–200.343 that will expand federal agencies’ discretion to terminate awards, including for reasons such as failure to advance “federal agency priorities or the national interest as they exist at the time of termination.” This proposal will also permit terminations with only a brief summary of justification and will remove the requirement for a hearing or an appeals process. Collectively, these changes will introduce significant uncertainty into the federally funded research system, undermine due process protections, and risk disrupting ongoing neuroscience research that depends on stable, multi-year funding commitments.

Neuroscience research is typically conducted over multiple years and often involves longitudinal studies tracking brain development, aging, or disease progression as well as maintenance of specialized equipment, animal models, or data infrastructure. Allowing termination based on shifting agency priorities or interpretations of the “national interest” introduces uncertainty that is fundamentally at odds with the long-term nature of this work. Researchers must be able to rely on the continuity of their awards to responsibly carry out approved projects.

Additionally, the proposed language allowing termination when an award no longer aligns with “federal agency priorities or the national interest as they exist at the time of termination” is overly broad and undefined. This can lead to subjectivity and inconsistency in how termination decisions are made across agencies or over time and the potential for abrupt shifts in funding decisions unrelated to scientific merit or peer review outcomes. The federal grant peer review system is designed to ensure that funded research already reflects national priorities and scientific value. Retroactive reassessment based on changing priorities undermines this process.

The grant proposal will require only a “brief summary” explaining the reason for termination, which is insufficient when it comes to transparency. This standard is inadequate for decisions with significant scientific, financial, and career implications. Investigators will lack clarity on the basis for termination, and the research community will be left without insight into how such decisions are made. Robust transparency is essential to upholding and maintaining trust in the federal research enterprise.

Lastly, the removal of the requirement for a hearing or appeals process represents a substantial departure from longstanding federal grants management principles and raises serious concerns. Researchers and institutions will have no formal mechanism to challenge terminations, even where decisions may be based on incomplete or inaccurate information. The absence of an appeals process reduces accountability and increases the risk of arbitrary decision-making. Under these proposals, investigators will face heightened vulnerability to sudden disruptions in funding. Due process protections are essential safeguards that ensure fairness and integrity in federal funding decisions.

SfN strongly urges OMB to reconsider and withdraw the proposed changes to Subpart D of Sections 200.340–200.343 and to preserve critical safeguards that support stability, transparency, and fairness in federal research funding. A stable and predictable funding environment is essential for advancing neuroscience research and maintaining U.S. leadership in biomedical innovation and competitiveness. These proposed revisions will introduce uncertainty, weaken due process protections, and risk disrupting critical research efforts already underway.

Subpart E—Cost Principles

Section 200.432—Conferences

SfN respectfully opposes the proposed requirement for agency approval of costs for attending conferences [Section 200.432]. The proposed requirement undermines the dynamic nature of scientific exchange and introduces increased administrative burden. Conferences are a primary mechanism through which researchers disseminate findings, receive peer feedback, establish collaborations, and stay current with rapidly evolving fields.

Requiring prior agency approval fails to account for the unpredictable timing of scientific discovery and emerging opportunities for engagement. It places disproportionate discretion with agency leadership rather than investigators and institutions, who are best positioned to determine when conference participation is scientifically valuable.

This restriction will delay or prevent timely dissemination of federally funded research findings. It will limit participation in key scientific meetings, particularly for early-career researchers who are working to establish themselves within the field and to continue the work into the next generation. It will reduce opportunities for interdisciplinary collaboration and innovation.

We recommend maintaining the current flexibility that allows reasonable and allocable conference costs without prior award-specific approval, subject to standard cost principles and institutional oversight. SfN requests reconsideration of the requirement in Section 200.432.

Section 200.454—Memberships, Subscriptions, and Professional Activity Costs

SfN respectfully opposes the proposed requirement for agency preapproval of professional society memberships and the prohibition on academic journal subscriptions [Section 200.454]. These requirements will significantly disrupt the infrastructure that supports scientific progress.

Professional societies play a central role in setting research standards and best practices. They provide training, networking, and career development opportunities, and they disseminate scientific knowledge through meetings and publications. Requiring investigators to justify memberships as strictly necessary to fulfill award requirements misunderstands the broader ecosystem of scientific work, where professional engagement is integral to maintaining expertise and advancing research quality.

The prohibition on journal subscriptions is particularly concerning. Access to current scientific literature is foundational to responsible research conduct, enabling investigators to build upon existing knowledge, avoid duplication of effort, and ensure methodological rigor and relevance.

SfN strongly urges OMB to recognize that society memberships and journal subscriptions are standard, allowable costs, subject to institutional oversight, as they support the general research environment.

Section 200.461—Publication and Printing Costs

SfN respectfully opposes the proposed disallowance of publication costs, even in cases in which agencies require public access to research findings [Section 200.461]. Disallowance of publication costs is fundamentally at odds with the core objectives of federally funded research.

Peer-reviewed publication is not an optional or ancillary activity; it is the primary mechanism by which scientific knowledge is validated, disseminated, and preserved. Publication costs, including article processing charges for open access journals, are a necessary and reasonable component of modern research.

While the proposal allows for agency preapproval of publication costs, it explicitly states that public access requirements do not imply authorization of such costs. This creates a contradictory and impractical framework in which researchers are mandated to share results but are not supported in doing so.

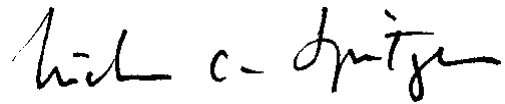
This provision will discourage publication in high-quality peer-reviewed journals, create inequities among researchers and institutions with differing financial resources, and undermine federal public access policies and the broader goal of maximizing the return on taxpayer-funded research.

SfN recommends explicitly recognizing publication and dissemination costs as allowable, without requiring case-by-case federal preapproval, and aligning cost principles with federal public access mandates.

Conclusion

SfN has outlined serious concerns with this proposed rule. Taken in totality, if this rule is finalized as proposed, it will result in a federal funding mechanism that risks our global leadership in biomedical research and is more burdensome for agencies and potential grantees. Therefore, we request that this rule be withdrawn. SfN, its members, and other relevant stakeholders are glad to work with the OMB on alternative approaches to increase transparency, reduce administrative burden, and ensure the best use of taxpayer dollars to safeguard our federal research enterprise and Americans' health and wellbeing. Please contact SfN's Director of Advocacy and Training, Adam M. Katz, at akatz@sfn.org, with any questions.

Sincerely,

A handwritten signature in black ink, reading "Nich C. Spitzer". The signature is fluid and cursive, with the first name "Nich" and last name "Spitzer" clearly legible.

Nicholas C. Spitzer, PhD
President, Society for Neuroscience