

# Office Hours OMB Proposed Rule on Federal Financial Assistance

ACS Government Affairs

# Agenda

- ACS Government Affairs – who are we? (5 min)
- Overview of OMB proposed rule and potential impacts (10 min)
- How to write an effective comment (10 min)
- Resources and examples (5 min)
- Q&A/Breakouts (30 min)

# ACS Government Affairs

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Public Policy

Legislative Advocacy

Federal Affairs

Member Engagement

- The Government Affairs team has 8 staff members, 5 of whom are registered lobbyists
- Our team helps ACS engage with policy by:
  - Helping members develop policy positions
  - Monitoring federal government activities
  - Advocating for policies/legislation that benefit chemistry
  - Serving as a source of scientific expertise for lawmakers
  - Providing tools for members to serve as their own advocates



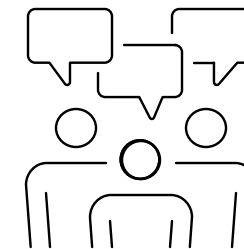
# ACS actions on proposed rule

- ACS Government Affairs currently coordinating official ACS response to OMB, incorporating expertise across organization
- Other ACS actions include
  - ▶ Requests for extension of comment period
  - ▶ Act4chemistry advocacy alert to newsletters and ACS community
  - ▶ Participation in coalition meetings and actions



# Overview of Proposed Rule

# NPRM and public comments



- Federal agencies implement policy by creating, amending, or repealing rules and regulations through a process called rulemaking. Agencies are required to post Notices of Proposed Rulemaking (**NPRM**) and other executive branch activity on the Federal Register and solicit **public comment**.
- Submitting a public comment is an important way to provide input on the consequences of a proposed rule and incorporate evidence into the policymaking process.
- Agencies are **required** to review all comments received and conduct a comment analysis. The agency then decides whether to proceed, to issue a new or modified proposal, or to withdraw the proposal. The information in public comments can also be used as evidence for any future legal action.

# Regulation for Federal Financial Assistance

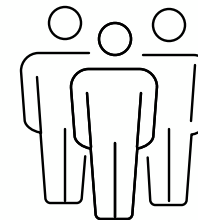
- The current NPRM “Regulation for Federal Financial Assistance” from the White House Office of Management and Budget (OMB) outlines significant changes to federal funding that would codify previous Executive Orders designed to restructure scientific research funding.
- The 412 page document governs funding across **all** agencies
  - ▶ Released on May 29
  - ▶ Comment period closes July 13
  - ▶ If finalized, would go into effect October 1

# Key changes – proposal review



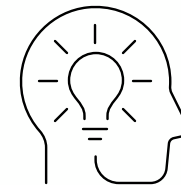
- **[200.202]** Requires grant programs and funding opportunities to be directly aligned with administration priorities
- **[200.205]** Provides political appointees within a given agency authority to evaluate proposals based on policy alignment, prior to peer review panels and subject-matter experts
- **[200.300]** Prohibits federal awards from supporting or promoting “DEI” or “gender ideology” initiatives

# Key changes – collaboration



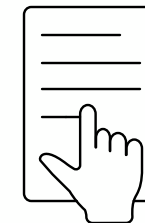
- **[200.202(e)]** Establishes a “domestic-first” framework for research awards
- **[200.220]** Prohibits funds that support collaboration with a foreign country or entity deemed as an adversary, of particular concern, or subject to sanctions

# Key changes – research dissemination



- Researchers would not be allowed to use grant funds for
  - ▶ **[200.432]** attending conferences or paying for professional society memberships
  - ▶ **[200.454]** paying for journal subscriptions to access the scientific record
  - ▶ **[200.461]** publishing in scholarly journalsunless explicitly pre-approved by the agency
- **[200.450]** Restricts federally supported researchers from engaging in issue advocacy

# Key changes – grant administration



- **[200.201]** Eliminates fixed amount awards
- **[200.205]** Establishes preference to give awards to institutions with lower indirect cost rates
- **[200.340]** Expands authority to terminate active and awarded grants at the discretion of the federal agency – with little required explanation – if the awardee/research does not align with program goals, agency priorities, or national interests. This includes a potentially new ability to temporarily suspend grants.

# Writing an Effective Comment

# Framing your comment

- OMB provided 3 main objectives for the proposed revisions:
  - ▶ Improving transparency, accountability, and oversight
  - ▶ Clarifying the regulatory status of the Part 200 text (i.e., streamlining this guidance across all agencies)
  - ▶ Reducing burden on award recipients
- Comments should focus on the implications of the NPRM on federal grantmaking processes, not the perceived intentions of administration officials
  - ▶ Provide salient examples of how funding uncertainty will harm the scientific ecosystem

# What to include in your comment

- Start with your background/expertise: what kind of federal grants have you been part of?
- Include the specific section number that you are commenting on for each associated paragraph, e.g. [200.205]. Do not feel compelled to respond to the entire proposed rule.
- Provide **specific facts, data, and details on how the proposed rule would impact you, your work, or the broader community**, rather than just stating “I support” or “I oppose.” How do federal grants support you, and what would happen if these changes were implemented?
- Highlight your unique experiences. Well-supported, **individual** comments are more valuable than template responses.
- Understand whether there are limitations on your use of institutional affiliation as part of your comments (or even the corresponding email). Be clear – representing yourself or your institution

# Closing thoughts

- Finalize and submit comments by **July 13 deadline**.
- We recommend reading over the proposed rule and background information, then drafting your individual comment in a separate document and pasting it into the form on the Act4Chemistry alert.
  - ▶ If your comment is over 5,000 characters, you will need to attach it as a document directly on regulations.gov by searching the docket number OMB-2026-0034-0001
- Public comments are not like writing form letters to members of Congress. Obvious template language is counted as a single perspective.

# Resources and Examples

# Resources

- [NPRM: Regulation for Federal Financial Assistance](#)
- [ACS Public Comment Guide](#)
- [Summary of proposed changes from former NIH program official](#)
- [Commenting guidance via regulations.gov](#)
- [Act4Chemistry comment submission form](#)

## [200.202] Requiring alignment with administration priorities

The strength of American science has always been that it funds questions worth asking, not questions politically convenient to answer. Much of the foundational spectroscopy and analytical chemistry research that **my company now commercializes, reference materials traceable to NIST standards, process monitoring techniques adopted by FDA-regulated manufacturers, originated from basic science grants that had no obvious policy alignment at the time of award.** Requiring grant programs to directly align with shifting administration priorities would narrow the pipeline of fundamental research that ultimately drives American industrial competitiveness and public health.

[Specific company example] illustrates this point precisely. The applied technologies my company brings to market today exist because someone received funding twenty years ago for work that no political appointee would have prioritized. **Today it represents a potential breakthrough in early Alzheimer's detection that could reduce diagnostic costs and improve patient outcomes on a massive scale.**

- Highlights connection between academia and industry research
- Provides specific example of research application that could be at risk under proposed rule

## [200.340] Grant termination and suspension

I also oppose changes to 200.340 that would terminate awarded grants; termination of a USEPA grant has already impacted the progress of a major study on potable water reuse, which should be a priority of our country as many Southwest communities face water shortages and other communities face issues with saltwater intrusion or wastewater contamination. Researchers like myself are struggling to find funding to support work regarding these critical issues that could lead to public mistrust of the safety and quality of drinking water, or worse, a failure of water infrastructure that is designed to maintain public health.

- Outlines specific burdens and harms resulting from the provision

## [200.205] – Political appointee review prior to peer review

In highly specialized fields such as semiconductor materials, lithography, polymer science, chemistry, and advanced manufacturing, a meaningful evaluation requires deep subject-matter knowledge. Inserting political review before scientific review would undermine confidence in the integrity of the grant process. It would also create incentives for applicants to frame their work around shifting political priorities rather than the best scientific questions or the most promising technical approaches. That would not improve accountability. It would encourage self-censorship, strategic wording, and potentially distorted descriptions of research aims. Over time, this would weaken scientific integrity and could increase the risk of waste, favoritism, and fraud by making policy alignment a gatekeeping criterion before expert review occurs. This change would be especially harmful to startups, small businesses, and emerging technology companies that rely on competitive federal programs to de-risk early-stage innovation.

- Addresses how proposed changes could reduce accountability and transparency

# Q&A

# Stay engaged in advocacy!

- Sign up for Act4Chemistry
- Take our advocacy workshop
- Explore our advocacy toolkit
- [acs.org/policy](https://acs.org/policy)
- [policy@acs.org](mailto:policy@acs.org)





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