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July 7, 2026

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

RE: RIN 0348-AB88

Director Vought:

I write in strong opposition to the Office of Management and Budget (OMB)'s proposed rule, "Regulation for Federal Financial Assistance."

This rule will impose a massive government-wide restructuring of federal grantmaking. The proposed changes will politicize the process by introducing political litmus tests, harm scientific research by imposing burdensome fees and restrictions on researchers, and inject uncertainty by basing eligibility on vaguely defined and impermanent political goals. These changes will not be merely guidance, but legally binding regulation. For these reasons, I object to the proposed rule and demand OMB withdraw it. My primary concerns with the rule are outlined below:

[Section 200.205] OMB argues that this proposed rule is needed to increase oversight and transparency of grant awards. In reality, this section would undermine nonpartisan grantmaking decisions based on scientific merit and agency needs and instead enforce a mandatory "pre-issuance review" by political appointees who likely do not have sufficient expertise in the grants they're approving. As the rule explicitly states, this pre-issuance review would require grant awards to support the ideological goals of the administration, dramatically increasing the administration's ability to punish their perceived political enemies through the denial of federal funding.

[Section 200.220] This section expands the "Wolf Amendment" to prohibit the use of federal funds for multilateral or bilateral collaboration, programs, and activities with certain foreign countries and foreign entities. While the goal of this section to protect national security and intelligence interests is understandable, it will have the consequence of severely limiting international scientific cooperation and collaboration.

[Section 200.300] This section would impose partisan ideological requirements on federal grants and grantees. It would prohibit the use of federal funds for a host of activities and research topics disfavored by the current administration and require compliance with standards that are only

defined and explained in Executive Orders, which are subject to change. This provision limits scientific independence and subjects grants to impermanent and vague political goals.

[Section 200.340] In addition to putting up a political hurdle before grant awards are made, this proposed rule also seeks to give the administration the authority to cancel federal awards at any time for any reason. This is a clear attempt to bolster the administration's past attempts to unlawfully cancel and suspend thousands of federal grant awards for purely political reasons, which wasted taxpayer dollars, interrupted ongoing scientific studies and clinical trials, and illegally impounded \$1.4 billion congressional spending¹. Additionally, to appeal a termination, grantees would have to go through the U.S. Court of Federal Claims, making it harder to get injunctive relief and forcing grantees to seek monetary damages that will not reinstate their grant.

[Section 200.342] This section goes even further by denying the right to an administrative hearing to grantees whose discretionary awards are denied or suspended, giving them even fewer ways to seek relief for the capricious cancellation of their grant awards. This section and the previous further enforce the administration's ability to retaliate against grantees it disagrees with and gives them no avenue for appeal.

[Subpart E – Cost Principles] This subpart seeks to severely restrict allowable costs for conferences participation, journal subscriptions, datasets, memberships in organizations, publication costs, and more. These provisions will inhibit the ability of scientific researchers to collaborate with their peers and disseminate the findings of federal funded research to relevant peers, policymakers, and the public.

Taken together, this rule represents a full-scale undermining of the American federal grant award process that will severely harm scientific research, increase the power of the OMB and political appointees, and give this administration additional tools to defund their perceived political enemies and stifle research into topics they do not like. For these reasons, I object to the proposed rule in the strongest possible terms and demand it be rescinded.

Thank you for your attention to this matter.

Sincerely,



Suhas Subramanyam
Member of Congress

¹ Kozlov, M., Tollefson, J., & Garisto, D. (2026, January 20). *US science after a year of Trump*. Nature.com. Retrieved July 2, 2026, from <https://www.nature.com/immersive/d41586-026-00088-9/index.html>