



Re: Regulation for Federal Financial Assistance (OMB-2026-0034-0001)

Submitted by the New England Society for Biomedical Research

The New England Society for Biomedical Research (NESBR) is a regional coalition of scientific, academic and research institutions whose professionals are dedicated to advancing medical innovation through rigorous, ethical biomedical research. Our members rely on federal financial assistance to conduct studies that save and improve lives, including work with laboratory animals and the development and validation of new approach methodologies (NAMs).^{[1][2][3]}

We strongly support transparent stewardship of public funds and the fair, nondiscriminatory administration of federal awards. However, we are deeply concerned that the proposed “Regulation for Federal Financial Assistance” would inadvertently undermine the biomedical research enterprise it seeks to regulate. As currently drafted, the rule would destabilize long-term research programs, politicize funding decisions, restrict dissemination of scientific findings, and slow the responsible integration of NAMs alongside essential animal research.^{[2][3][4][1]}

We respectfully urge the Office of Management and Budget (OMB) to revise the proposal to preserve scientific merit review, protect research continuity, and ensure that award conditions remain aligned with existing federal policies on open science, collaboration, and innovation.^{[3][1][2]}

Protect scientific merit review and research independence

The proposed rule formalizes broad pre-issuance and post-award review authorities that would allow non-scientific considerations and shifting “administration priorities” to override expert peer review in funding decisions and grant terminations. For NESBR members, whose work often intersects sensitive policy debates in oncology, neurology, infectious disease, toxicology, animal welfare, and NAMs adoption, this creates unacceptable uncertainty and opens the door to ad hoc political interference in individual awards.^{[4][2][3]}



NESBR urges OMB to:

- Explicitly reaffirm that independent scientific peer review remains the primary basis for award selection and continuation.
- Require that any deviation from peer review recommendations be documented with clear, objective programmatic reasons tied to statutory authority.
- Provide robust, transparent appeal mechanisms when awards are terminated or substantially modified for reasons unrelated to scientific progress or compliance.^{[2][3][4]}

Preserve continuity for long-term animal and NAMs research

NESBR members conduct multi-year animal studies and multi-phase NAMs projects that depend on stable funding and clear expectations over the life of a grant. Expanded authority to terminate or suspend awards based on changing policy priorities, rather than non-compliance or inadequate performance, threatens to disrupt these programs mid-course.^{[3][4][2]}

Frequent or mid-stream terminations in long-term animal and NAMs studies can:

- Waste animal cohorts and compromise ethical commitments.
- Destroy longitudinal data sets that are critical for understanding chronic conditions and treatment effects.
- Delay NAMs validation, because many alternative methods must be compared against well-designed animal studies over time to gain regulatory acceptance.^{[4][2][3]}

NESBR recommends that OMB:

- Limit mid-award terminations to clearly defined categories such as material non-compliance, significant under-performance, or statutory changes that make the award objectively unlawful.
- Require agencies to consider animal welfare consequences and data integrity when contemplating termination of studies involving live animals.



- Protect multi-year NAMs development and validation projects from arbitrary disruption.^{[2][3][4]}

Safeguard dissemination, publication, and professional participation

Proposed changes to cost principles appear to treat publication charges, conference participation, professional memberships, and journal subscriptions as largely unallowable or subject to burdensome prior approvals. For biomedical researchers, these are core components of the scientific mission, not discretionary extras.^{[3][4][2]}

Open publication, conference engagement, and professional society participation are essential to:

- Ensuring that taxpayer-funded research benefits scientists, clinicians, patients, and policymakers.
- Facilitating rigorous peer scrutiny of animal and NAMs studies, improving methods and ethical standards.
- Accelerating responsible NAMs adoption through shared data, validation frameworks, and regulatory experience.^{[4][2][3]}

These restrictions also conflict with longstanding federal commitments to open science and public access to federally funded research.^{[2][3]}

NESBR urges OMB to:

- Recognize publication fees, reasonable conference travel, and relevant professional memberships as generally allowable costs when they directly relate to disseminating and improving funded research.
- Align dissemination allowability with existing open-access and public-access policies.
- Avoid administrative burdens that make it impractical for investigators, especially early-career scientists and those at smaller institutions, to share their findings.^{[3][4][2]}



Avoid chilling policy-relevant and collaborative science

Ambiguous restrictions on engagement with “policy theories” and broad “risk” assessments for researchers and institutions risk chilling legitimate, non-partisan activities. NESBR members routinely provide expert input on regulatory proposals affecting animal research and NAMs, participate in multi-stakeholder consortia, and conduct studies that inform difficult regulatory decisions—exactly the kinds of activities needed to improve public health and animal welfare.^{[4][2][3]}

NESBR recommends that OMB:

- Clarify that objective research, data sharing, and participation in formal public comment processes are permissible and valued uses of federal research awards.
- Define “risk” assessment criteria narrowly and transparently, focusing on compliance and security rather than the lawful content of scientific findings or evidence-based positions.
- Ensure that tightened rules on foreign collaborations do not inadvertently block international NAMs and animal welfare initiatives that serve shared public health and ethics goals.^{[2][3]}

Mitigate disproportionate impact on regional and smaller institutions

NESBR’s membership includes major universities and hospitals as well as smaller institutions, nonprofit research centers, and specialized animal care facilities critical to the biomedical ecosystem. The cumulative effect of expanded review authorities, ambiguous risk assessments, and new allowability restrictions will fall hardest on institutions with limited administrative capacity, reducing diversity and opportunity in the research landscape.^{[3][2]}

NESBR urges OMB to:

- Conduct a detailed impact assessment on smaller and regional research organizations before finalizing the rule.



- Include explicit provisions to minimize administrative burden for institutions with limited capacity, without compromising accountability.
- Engage directly with scientific societies and coalitions such as NESBR to understand practical implementation challenges and adjust the rule accordingly.^{[2][3]}

Conclusion

NESBR shares OMB's goals of transparency, accountability, and nondiscrimination in federal financial assistance. Yet, as currently drafted, the proposed Regulation for Federal Financial Assistance would introduce instability and politicization into biomedical research funding, restrict essential dissemination activities, and impede both animal-based and NAMs-based innovation.^{[1][4][3][2]}

We respectfully request that OMB:

1. Reaffirm and strengthen the central role of scientific peer review.
2. Narrow and clearly define termination and "risk" authorities to protect research continuity.
3. Restore the allowability of core dissemination and professional activities.
4. Clarify that policy-relevant, collaborative science is a legitimate and valued use of federal research funds.
5. Account for disproportionate burdens on smaller and regional institutions.^{[4][3][2]}

NESBR stands ready to collaborate with OMB and federal agencies to develop a framework that ensures responsible use of public funds while safeguarding the scientific independence and stability required to advance medical innovation for patients and communities across New England and the nation.^{[3][2]}

Respectfully submitted,

New England Society for Biomedical Research



References

1. <https://www.govinfo.gov/app/details/FR-2026-05-29/2026-10817>
2. <https://www.aibs.org/news/2026/260604-omb-statement>
3. <https://www.aamc.org/about-us/biomedical-research/science-policy-hub/omb-proposed-rule-revise-uniform-guidance>
4. <https://www.asbmb.org/advocacy/position-statements/statement-on-omb-federal-financial-assistance>