

**Public Comment from the Federation of Associations in Behavioral & Brain Sciences
(FABBS)**

Re: [FR Doc. 2026-01676](#) (“Information Collection; System for Award Management Registration Requirements for Financial Assistance Recipients”)

Date: March 30, 2026

The Federation of Associations in Behavioral & Brain Sciences (FABBS) represents 34 of the nation’s leading scientific societies in the psychological, cognitive, and behavioral sciences. Our mission is to advance the sciences of mind, brain, and behavior; promote evidence-based policymaking; and support the integrity and impact of the federal scientific enterprise. With support from federal agencies – including the National Institutes of Health (NIH), National Science Foundation (NSF), and Institute of Education Sciences (IES) – FABBS scientists study critical issues such as chronic health conditions, workforce development, and educational outcomes.

We value the opportunity to comment on the General Services Administration’s (GSA) proposal to change the registration requirements for the System for Award Management (SAM) and encourage GSA to consider the implications for America’s scientific enterprise. FABBS has several concerns that the proposed changes to the SAM certification requirements are prohibitively vague, will negatively impact scientific research, and contradict Gold Standard Science and congressional guidance.

- (1) **Vagueness** – The ambiguity of the proposed certifications will make it difficult for recipients to know if they are in compliance. Most notably, GSA has failed to define “diversity, equity, inclusion, and accessibility” (“DEIA”) and does not distinguish between legal and illegal DEIA efforts. The anti-DEIA certification instead implies that all such efforts are illegal based on the assumption that they involve discriminatory practices. However, DEIA activities can be administered legally, and many have been upheld by courts as lawful. More specifically, it is unclear whether certain research topics might be considered “unlawful” and thus violate the certification despite being scientifically sound. For example, more than 90 percent of Americans living with sickle cell disease (SCD) are Black or African American – does this Administration consider a study on SCD that includes only Black participants discriminatory? More broadly, is any research involving the examination of race, no matter the context, considered discriminatory? Scientists cannot know based on the information provided by GSA.
- (2) **Impact** – The certification threatens criminal penalties. These threats, combined with the ambiguity, may deter individuals, institutions, and organizations from applying for federal funding. Compliance with these certifications will impose a significant cost and

time burden on recipients because they will need to devote resources to legal consultation to navigate a difficult landscape in which the judicial and executive branches disagree on what is and is not legal conduct. Interested applicants might avoid applying for funding altogether, deciding that the legal and financial risks are not worth it. This will be particularly challenging for smaller, less-resourced institutions, directly contradicting the Administration's goal of improving the geographic diversity of research grant awardees. Discouraging scientists from applying for federal funding will only harm the American population in the long run, as research is a pillar of improving health and well-being, promoting economic growth, and protecting our national security.

For those that do move forward with grant applications, they will need to divert time and resources away from research to engage in compliance-related activities, increasing administrative burden and reducing efficiency. This comes at a time when federal science agencies are actively trying to maximize the time and money scientists spend on their work compared to non-research activities (e.g., [NIH's allowable publishing costs policy](#)).

- (3) **Gold Standard Science (GSS)** – With these certifications, GSA is inserting political ideology into the federal grantmaking process, contradicting the principles of GSS, which include rigor, unbiased review, and evidence-based decision-making.
- (4) **Contradicting Congressional Direction** – GSA may not have the legal authority to implement the changes it proposes. As with all federal agencies, GSA cannot add conditions to federal funding that conflict with the statutory requirements established by Congress. The executive branch can only execute federal law as written by the legislative branch and cannot impose conditions that Congress has not authorized. Additionally, the ambiguity inherent in the new certifications violates the Constitution's Spending Clause, which requires the federal government to provide clear notice to recipients of federal funding about the conduct expected of them.

The certifications also contradict federal research priorities set by Congress. For example, in the report for its Fiscal Year 2026 Labor, Health and Human Services, and Education appropriations bill, the Senate directed the National Cancer Institute and the National Institute on Minority Health and Health Disparities to fund research on Native Americans' cancer outcomes, as this group's cancer incidence and mortality rates are much higher than in non-Native populations. GSA's new certifications may prevent federal grant awardees from carrying out this kind of work – despite its congressional support – because it may limit research participation to just one group.

FABBS is grateful for the opportunity to weigh in on GSA's proposed changes to the SAM certification requirements, as their unintended consequences would negatively impact America's research enterprise. Before moving forward with implementation, we encourage GSA

to consider not only the legality of the proposal, but also the outcomes that might follow due to the ambiguity of the certifications, the resulting barriers to participation in federal funding programs, and the contradictions with the principles of GSS. Such consequences must be mitigated before implementation. FABBS is happy to serve as a resource to the agency on matters concerning the impact of these changes on the scientific community.