Federation of Associations in Behavioral & Brain Sciences

August 24, 2026

Suzanne H. Plimpton
National Science Foundation
Randolph Building, 401 Delany Street
Alexandria, VA 22314

Re: NSF Guidance on Financial Assistance Draft For Public Comment (NSF-2026-OTR-0001-0002)

Dear Ms. Plimpton:

I submit these comments on behalf of the Federation of Associations in Behavioral and Brain Sciences. FABBS represents 35 scientific societies and 60 academic departments in the psychological, cognitive, and behavioral sciences. We advance the sciences of mind, brain, and behavior; promote evidence-based policymaking; and advocate for the integrity and impact of the federal scientific enterprise. Thank you for the opportunity to provide input on the proposed changes incorporated into the National Science Foundation's (NSF) draft Guidance on Financial Assistance (GFA).

FABBS appreciates that, for many years, NSF has consistently worked to streamline and modernize its Proposal and Award Policies and Procedures Guide (PAPPG) with the goal of providing clear, up-to-date guidance to benefit both the agency and the research community. However, this notice is premature and does not provide a meaningful opportunity to comment.

For starters, FABBS questions the appropriateness of Paperwork Reduction Act notice and comment. The proposed GFA makes significant changes to NSF policies and procedures, well beyond past changes and modifications to previous PAPPGs. Based on our previous experience responding to opportunities to comment, a Notice of Proposed Rulemaking (NPRM) would be a more appropriate mechanism for changes of this significance. As you well know, NSF is without a Director and a National Science Board. FABBS believes these significant changes should not be put forward in the absence of leadership.

The proposal aspires to align with Executive Orders (EOs); however, many of these orders are the subject of active litigation. FABBS struggles to understand how it is appropriate to request feedback on, much less implement an EO, that is in active litigation.

In addition, the proposal refers to 2 CFR 200 (OMB-2026-0034), despite the fact that Congress has expressed significant concerns about the Office of Management and Budget's (OMB) draft rule and has halted the implementation. Additionally, it is important to mention that OMB is

required to consider the tens of thousands of comments submitted. Please find below the comments that FABBS submitted to OMB in response to OMB-2026-0034, encouraging OMB to withdraw the proposed rule.

Considering how NSF would implement provisions in the OMB proposed rule raises significant practical considerations. Take, for example, the requirement that a political appointee do a pre-issuance review for all awards. There are multiple issues with this requirement, even putting aside the fact that NSF has not had a political appointee since 2025. First, reviewing tens of thousands of grants under the OMB's pre-issuance review requirement is impractical. Additionally, it is unclear how NSF would ensure public accountability for decisions that may advance national health, prosperity, and welfare, and secure national defense—the core mission of the agency. A political pre-issuance review threatens the strength and reliability of the merit review system. Such a change reduces transparency and efficiency while increasing the potential for fraud and abuse.

Among other concerns, FABBS opposes the break from longstanding NSF policies to support scientific conferences. Scientific societies are an essential component of the research ecosystem, and much of their value comes from conferences. These annual convenings are particularly valuable to early career researchers who benefit from receiving direct feedback on their research and engaging with disciplinary colleagues in ways that might not be possible in academic departments. Awards and honors issued at annual conferences help set the ethical and methodological norms for scientific disciplines.

To reiterate, FABBS strongly disagrees with the proposed changes in the agency's GFA. Our position is expanded in greater detail below in our response to OMB-2026-0034.

Thank you for your consideration,
Juliane Baron
Executive Director

FABBS Federation of Associations in Behavioral & Brain Sciences

July 10, 2026

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

Subject: Comments on Regulation for Federal Financial Assistance (OMB-2026-0034)

Dear Director Vought:

Thank you for the opportunity to provide comments on the proposal to revise the Guidance for Federal Financial Assistance (OMB-2026-0034) on behalf of the Federation of Associations in Behavioral and Brain Sciences (FABBS). FABBS is a coalition of 35 scientific societies committed to developing knowledge for the betterment of society by advancing the sciences of mind, brain, and behavior. Our members have decades of experience participating in rigorous peer review processes and competing—successfully and unsuccessfully—for federal funding. They embrace the potential for scientific research to benefit society and have dedicated their careers to doing just that, whether by building the foundations for artificial intelligence (AI), developing behavioral interventions for chronic health conditions, or improving understanding of learning disabilities, to name just a few examples.

As a nonprofit, nonpartisan organization, we are deeply concerned that the proposed changes would inject politics and ideology throughout the grantmaking process and undermine the independent and evidence-based scientific research that fosters innovation and drives American competitiveness.

FABBS urges OMB to comprehensively revise the proposed rules so they align with the stated goals and ensure that the scientific community and the American people can continue to benefit from the critical, bipartisan funding for scientific research. Below we identify provisions that would result in significant harms to the scientific community and our members if the proposed rule changes go into effect. We clustered our comments around two themes: 1) The integrity of scientific review and approval process and 2) The ability to conduct and communicate science. In each of these cases, we urge OMB to preserve the language in the current 2 CFR §200.205.

Compromises Integrity of Scientific Review and Approval Process

Requiring political appointees to conduct pre-issuance review overrides peer review, injects subjectivity and bias, and undermines independent and evidence-backed scientific research (§200.205). FABBS urges OMB to preserve the language in the current – Federal agency review of merit of proposals – and withdraw the proposed changes from the final rule. As 2 CFR 200.205 currently states, "a merit review is an objective process of evaluating Federal award applications in accordance with the written standards of the Federal agency." Peer review involves rigorous, independent, and expert evaluation of grant applications. The proposed rule overrides peer reviewers' decision-making by empowering political appointees, rather than scientists. The factors that are provided for the "pre-issuance review" are based on ideology, not science. At a minimum, applicants would require clear definitions for the vague terms such as "anti-American values," so they can have fair notice when they submit their applications.

Every administration has the right—indeed, the obligation—to incorporate their priorities into federal grant programs, as long as they follow statutory requirements and Congressional directives. However, the time to do that is when the notice of application is developed, not after the fact. The timeline for the review process for federally funded grants often crosses administrations. Placing applicants and the reviewers in the position of constantly redoing the application review process based on a specific president's priorities would be wasteful for taxpayers and would significantly delay research programs.

The regulation's use of ill-defined terms and non-reviewable political pre-screening is the opposite of the stated goal of transparency. Furthermore, by making peer review advisory for the ultimate decisions for which grants get funded, the agency and the researchers who act as peer reviewers would be expending significant time on a process that will become less significant and, therefore, is an irresponsible use of taxpayer funds.

Allowing any administration to terminate grants would interfere with reliance interests and waste taxpayer funds (§200.202; §200.340). Terminating grants for reasons that could not be anticipated or known when the grantee made a determination to accept the funds and begin their research project may infringe upon a grantee's reliance interests. Ending a grant in the middle of a budget period and failing to spend those funds on the appropriated program may violate the Spending Clause.

In addition, allowing grants to be "suspended" under §200.340(e) will cause unnecessary and costly delays to the grantees and taxpayers. Further, if clinical trials are halted due to loss of funding, patients may have to delay or even stop life-saving treatment. We urge OMB to prohibit grants from being terminated for convenience by removing the phrase "at the time of termination" from 200.202(a)(2). Instead, a demonstration of noncompliance should be required for termination of a grant by a federal agency.

Allowing grants to be ended at the whim of any administration currently in office, in the middle of approved projects, is shortsighted, costly, and harmful to the scientific outcomes of these programs. Terminating federal research funding midstream has been shown to have direct impacts on access to scientific treatments, medical outcomes, and the development of future innovations. It also has harmful economic impacts on both the research institutions doing the work and the industries that benefit from the development of new technologies. The uncertainty that grants can be terminated at any time for any reason will deter scientists from applying for federal funds and close the door on potential discoveries. This uncertainty will particularly deter early career researchers who frequently drive innovation. The long-term impact of the uncertainty will be devastating to the U.S. STEM workforce driving researchers abroad or out of STEM fields entirely.

Removing due process protections for grantees is arbitrary and capricious (§200.341; §200.342; §200.343). The proposed rule removes a guaranteed right to appeal, limiting the recourse available for grantees if their grants are terminated based on agency discretion (§200.342). By not requiring a detailed analysis of the reason for termination or an individualized determination (§200.341(c)(1)), the proposed rule fails to ensure that grantees have the information they need to be able to challenge a termination.

Furthermore, if a grant is terminated, the proposed rule would limit the amount of recoverable costs (§200.343) and leave too much discretion to the federal agency which may lead to additional costs for the grantee that they could not have anticipated. We urge OMB, if the termination provisions remain as is, to ensure that grantees have the protections needed to challenge any illegal actions that may occur that would jeopardize their work and access to federal funding.

"Gold Standard Science" is undefined and too vague of a standard to enforce (§200.205). As part of the pre-issuance review, §200.205(b)(5-7), grants would be required to have a commitment to "Gold Standard Science," an undefined term based on language in President Trump's Executive Order 14303. Using such a vague and undefined term will lead to subjectivity and bias in grant selection, and confusion and increased burden on applicants.

Conducting broad risk review raises First Amendment concerns (§200.206). FABBS agrees that it is critical that federal funds are used as intended and that all efforts are taken to protect against fraud by reviewing a grantee's financial risk. However, the proposed additions to §200.206 make decisions about a grantee's financial risk based on a review of an applicant's memberships or affiliations with organizations, insert considerable subjectivity into the risk review process, and jeopardize applicants' First Amendment rights. Furthermore, the new review criterion regarding "questionable practices" is too broad and leaves too much discretion to make

these determinations based on ideology rather than genuine risk. Also unclear is which public sources will be considered "credible." We urge OMB to limit the risk review criteria to those that are determinative of a grantee's financial risk.

Preventing federally-funded research from considering the disproportionate impact on specific populations undermines public health (§200.218). Given the limited funding available for scientific research, it is critical that studies on public health examine how economic and social conditions may lead to unequal health outcomes across demographic groups. The across-the-board prohibition in §200.218 would undermine the broad benefits of much of the research being conducted. Furthermore, the prohibition would prevent one of the pillars included in NIH's unified strategy[1]—which recognizes the investments made in health disparities research and the need to develop solution-oriented approaches to improving health outcomes for minority populations—from being able to be implemented. For these reasons, we urge OMB to remove this provision from the final rule.

Undermines Ability to Conduct and Communicate Science

Limiting allowable costs for grantees will restrict the dissemination of evidence-based research and be an obstacle to open access science (§200.432 and §200.461). The scientific societies that FABBS represents play a critical role in bringing researchers together to improve the rigor of the scientific process and the impact of scientific findings. Much of this work is done through their unique ability to host conferences for individuals across disciplines and providing professional development for the next generation of scientists. Scientific conferences are essential to the research enterprise, providing investigators with opportunities to present new findings, learn about the latest scientific advances and methodologies, establish collaborations, receive feedback from peers, and identify new directions for future research. FABBS scientific societies also disseminate research to a wide audience via their peer-reviewed journals, presentations, and poster sessions. Making it harder for grantees to use federal funds to attend scientific conferences (§200.432) and prohibiting publication costs in professional journal and peer-reviewed publications (§200.461) will make it more challenging for scientific societies to fulfill these critically important dissemination roles.

Furthermore, these restrictions on uses of grant funds contradict one of the main purposes of federally-funded scientific research: to make the research and findings available for future uses and applications. We urge OMB to maintain the current rules which allow funding for conferences and publication costs where they are necessary and reasonable for successful performance of the Federal award.

[1]https://www.nih.gov/about-nih/nih-director/statements/advancing-nihs-mission-through-unified-strategy#our-priorities

Restrictions on scientists' ability to communicate about their findings will limit the impact of taxpayer-funded research and may infringe on researchers' First Amendment rights (§200.450). Federal law already prohibits the use of funds for lobbying. The added restrictions in §200.450 will likely have a chilling effect on scientists and scientific societies ability to share their relevant research findings to educate the broader public and policymakers. The restrictions on influencing state government actions undermines one of the benefits of federal investments - informing decision making. The proposed additions to this rule would ultimately restrict how taxpayers benefit from the research they are funding and should not be included in the final rule.

Incentivizing lower indirect costs devalues scientific merit in the review process (§200.205). While FABBS appreciates that the rule did not propose changes to the indirect cost rate, we oppose the proposed attempt to incentivize researchers to lower their indirect costs in order for their application to be selected, and the additional limits to indirect costs which are proposed throughout the rule. Individual researchers do not control indirect costs. Consideration of indirect costs rates in grantmaking decisions compromises the review process by devaluing the scientific merit and risking overlooking innovative applications. This provision also appears to sidestep Congress' directive to the Administration regarding the indirect cost model. This preference may disadvantage smaller institutions with limited resources to carry out federal grants in the absence of substantive indirect cost support.

Broad restrictions on foreign collaboration will slow scientific innovation and reduce America's competitiveness (§200.202; §200.220). FABBS believes the restrictions on international elements in grants described in §200.202(e) are too broad and may have unintended consequences for groundbreaking scientific research. The broad language in the proposed rule may also lead to a chilling effect on researchers' collaborations. We urge OMB to consider a narrower approach to this to protect our national security interests while maintaining the benefits of international scientific engagement.

Layering on additional requirements for grantees imposes unnecessary costs and administrative burdens (§200.208; §200.305). The proposal includes several new requirements that will cause additional expense and administrative burden to grantees in completing the work of their federal award. First, requiring detailed payment justification for each payment request under §200.305 is unnecessary given the approval process for grantees' budgets at the beginning of their grant period. In addition, because the federal scientific workforce has been significantly reduced, these burdensome requirements would contribute to significant delays to critical work.

Second, while we appreciate that the proposed rule maintains the notice requirements for imposing conditions on a grantee's funds, we believe these conditions should continue to be tied to a grantee's individual risk level rather than be able to be imposed at the program level as it does in the proposed changes to §200.208.

Allowing the federal government to join private lawsuits to block inappropriate spending will lead to frivolous lawsuits (§200.339(b)). The provision is unnecessary because the False Claims Act already exists; individuals and the government are currently permitted to partner when there is a violation of the law, such as fraud. This provision, combined with the vague terms throughout this proposed rule and in new terms and conditions for grants, is likely to have a chilling effect by increasing the number of frivolous lawsuits — as private citizens will now be allowed to bring lawsuits if they believe the terms and conditions of a federal award have been violated — and discouraging researchers from applying for federal funding.

In summary, while we appreciate the overarching goals of improving transparency, accountability, and oversight over usage of taxpayer dollars, as well as the reduction of recipient burden, the proposed rules would accomplish the exact opposite. The use of vague terminology throughout the rule fails to provide funding applicants with fair notice of what is required. Furthermore, according to researchers and members who have extensive experience with the federal grantmaking process, the new proposed requirements—which are being done under the guise of increasing transparency, accountability and oversight—would actually restrict the intended uses of the federal funds, add bureaucratic processes, and be burdensome to the grantees.

Furthermore, FABBS takes issue with the lack of a meaningful Regulatory Impact Analysis (RIA) for this "economically significant" rule. OMB acknowledges they were "unable to quantify the expected costs" but estimates there are "minimal to modest to substantial short-term costs for recipients related to implementation of the rule." The RIA underestimates the significant costs to grantees associated with the new compliance requirements and the need to hire counsel and experts to understand and implement the changes.

We oppose the process of how these proposed rules were developed, reflecting a lack of knowledge about federal science grantmaking, limited stakeholder input, and unreasonably short comment period. In these comments, FABBS has identified the most concerning provisions; this is not an endorsement of the provisions not listed.

If OMB moves forward with changes to the uniform guidance, FABBS urges OMB to ensure there is sufficient time between the issuance of the final rules and the implementation so grantees have adequate notice to make any needed changes to remain in compliance.

Thank you for your consideration,

Juliane Baron
Executive Director