



July 13, 2026

Office of Management and Budget
Office of Federal Financial Management
Submitted electronically via Regulations.gov

Re: Comment on the Proposed Rule, "Regulation for Federal Financial Assistance," (May 29, 2026) (Docket No. OMB-2026-0034)

To the Office of Management and Budget:

Public Responsibility in Medicine and Research (PRIM&R), which has more than 3,200 active members throughout the research enterprise, appreciates the opportunity to respond to the Office of Management and Budget's proposed Regulation for Federal Financial Assistance (OMB-2026-0034).

PRIM&R is a nonprofit organization dedicated to advancing the highest ethical standards in the conduct of research. Since 1974, PRIM&R has served as a professional home and trusted thought leader for the research protections community. PRIM&R seeks to ensure that all stakeholders in the research enterprise appreciate the central importance of ethics to the advancement of science. Our perspective is informed by the experiences of professionals responsible for implementing federal research regulations across academic, healthcare, government, and independent research institutions.

PRIM&R submits this comment in addition to the joint comment submitted by PRIM&R, the Association for the Accreditation of Human Research Protection Programs (AAHRPP) and the National Advisory Committee on Human Research Protections (NACHRP). Our joint comment addresses two provisions of shared concern to our organizations: the subordination of scientific peer review to political appointee discretion under §200.205, and the risk to research participants posed by abrupt, discretionary grant termination under §§200.340-342. PRIM&R endorses those comments fully and writes separately to amplify additional concerns raised by our membership and community.

The practical impact of the proposed rule may fall disproportionately on communities that depend most on federally funded research, including rural communities, lower-income populations, and patients who receive care through smaller institutions far from major academic medical centers. Research that identifies and addresses measurable health disparities by geography or economic status, for example, may become less feasible under this proposed rule. PRIM&R urges OMB to consider whether this outcome serves the administration's broader goals of advancing scientific progress for U.S. citizens. Further, increased uncertainty surrounding funding decisions could make it more difficult to sustain research in these settings, potentially widening existing gaps in health outcomes.

In advance of this comment deadline, PRIM&R reached out to our membership and broader community to solicit input on the proposed rule. We received thoughtful feedback from IRB

professionals, researchers, scientists, research administrators, and institutional officials representing diverse sectors of the research enterprise. The concerns voiced by our community reinforce and extend the points raised in our joint comment.

In summary, the PRIM&R community raised the following concerns regarding the proposed rule. Peer review, respondents said, should remain the primary basis for funding decisions. Respondents also consistently expressed concern that allowing appointees to override or supersede scientific peer review would undermine confidence in the fairness, integrity, and credibility of the federal research enterprise. Scientific merit should remain the principal criterion for funding decisions. Research oversight professionals depend on rigorous peer review as an important foundation for evaluating the ethical acceptability of research.

Respondents noted that undefined or inconsistently applied standards could lead institutions to adopt overly cautious interpretations that extend well beyond the rule's intended scope. Such uncertainty may discourage scientifically valuable research and reduce the nation's ability to remain competitive in science and technology.

The proposed rule could contribute to instability in the research workforce. Respondents expressed concern that increased uncertainty surrounding funding decisions and grant continuation could jeopardize positions for technicians, research coordinators, postdoctoral scholars, and early-career investigators whose work depends on multi-year federal awards. Such instability could have lasting consequences for the development and retention of the next generation of researchers.

For the reasons described above and in our joint comment with AAHRPP and NACHRP, PRIM&R respectfully urges OMB to revise the proposed rule in ways that preserve rigorous scientific peer review, promote stable and predictable research funding, and protect the integrity of the research enterprise.

We welcome the opportunity to provide additional information or work collaboratively with OMB to develop approaches that advance accountability while continuing to foster rigorous research that benefits the American public. Thank you for your consideration of these comments.

Sincerely,

A handwritten signature in black ink that reads "Ivy Tillman". The signature is written in a cursive, flowing style.

Ivy R. Tillman, EdD, CIP
Executive Director
Public Responsibility in Medicine and Research (PRIM&R)