

**Subject:** Public Comments: Regulation for Federal Financial Assistance (Docket ID: OMB-2026-0034 / RIN 0348-AB81)

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**Sections Addressed:** [200.202(e)], [200.205], [200.206], [200.305], [200.332], [200.340], [200.432], [200.454], [200.461], and general comments

To Whom It May Concern:

I submit these comments in my personal capacity as an atmospheric scientist specializing in extreme weather and natural hazard risk. My primary professional role at the University of California Agriculture and Natural Resources (UC ANR) provides me with a daily understanding of the federal financial assistance ecosystem, and my secondary role as an advisor to multiple companies extends that understanding to the indispensable role public institutions play in enabling private sector productivity. My work intersects physical science and real-time public communication, particularly during acute extreme weather and wildfire-related emergencies.

**I am writing to express my profound alarm regarding the sweeping revisions proposed to 2 CFR Part 200 (the Uniform Guidance).** These amendments represent a radical deviation from decades of nonpartisan deference to scientific expertise and local/state autonomy. If finalized, this rule will fundamentally alter the nature of federal grantmaking by transforming it into an overtly partisan political process in which the Executive Branch can exert direct ideological control. The introduction of political appointee vetoes, arbitrary mid-performance termination clauses, and severe public speech restrictions will yield the exact opposite of the administration's claimed "Gold Standard Science." Instead, it will create a sycophantic funding apparatus where successful proposals are judged by their alignment with the political party currently in power rather than their objective merit. **The resulting structural chaos, solidification of permanent operational precarity at universities, and severe chilling effects on constitutionally protected speech will collectively degrade American global competitiveness and collapse long-standing public-private partnerships. Worse, there is a high risk that the proposed rules would ultimately cost human lives during acute meteorological and geophysical disasters—precisely when swift and unencumbered decision-making matters most.**

In the sections below, I enumerate multiple concerns associated with specific sections of the new proposed rules.

### **[200.205, 200.206] The Politicization of Merit-Based Peer Review**

The core integrity of the broader scientific endeavor—and also of American federal science funding specifically—relies upon independent and competitive peer review. However, the proposed mechanisms under § 200.205 and § 200.206 systematically dismantle this foundation by introducing a centralized "pre-issuance review" framework. Under these updated guidelines, senior political appointees are granted explicit authority to review all discretionary grant proposals selected for funding. Crucially, the rule frames traditional peer-review panels as merely "advisory," rather than being routinely deferred to by the granting agency (as has been

standard practice for decades). This allows political staff to directly override scientific evaluations to ensure that awards “demonstrably advance the President’s policy priorities.”

By shifting funding decisions from transparent, scored peer-review panels to opaque, closed-door evaluations by political actors using unquantifiable ideological metrics, the grantmaking process becomes a political black box. This introduces enormous and unquantifiable subjectivity into a system that has been strictly nonpartisan across presidential administrations for decades. It would create an environment in which scientists and other potential federal grant recipients will be under great pressure to shape their research questions, methodologies, and language to satisfy the partisan whims of whoever occupies the White House (via their newly politically accountable agency and departmental proxies). This structural shift will be devastating to researchers who rely on objective, merit-based metrics to establish and sustain their labs, and it forces established research centers to engage in ideological sycophancy just to maintain baseline funding. As the American Physical Society (APS) has forcefully noted in its expressions of concern regarding these rule changes, substituting political discretion for objective scientific merit directly undermines the credibility and public trust required for the scientific enterprise to function.

#### **[200.340] Disruption of Research Continuity and Operational Chaos**

Scientific exploration and technological innovation are not off-the-shelf commodities that can be turned on and off like a standard procurement contract. Multi-year longitudinal studies, not to mention the accumulation of priceless institutional knowledge across sectors vital to the prosperity and well-being of Americans, require unbroken structural and financial continuity over years and decades. The proposed updates to § 200.340 directly threaten this continuity by importing procurement-style “termination for convenience” and 90-day temporary suspension mechanisms into the federal financial assistance framework. This grants agencies the unmitigated authority to suspend or cancel discretionary grant awards mid-performance if an agency determines that an award “does not effectuate program goals, Federal agency priorities, or the national interest as they exist at the time of the termination.” This creates a highly weaponizable system where administrative officials can exert punitive pressure on universities and independent labs at any time—and for any reason—effectively holding entire research portfolios hostage if an entity or an individual researcher falls out of political favor.

If a federal grant can be abruptly rescinded mid-award because an administration changes or shifts its policy positions, the financial and operational risk of conducting public science becomes completely untenable. Universities and independent research laboratories cannot maintain payroll for graduate students, postdocs, and technical staff under a regime of permanent administrative chaos. The preexisting financial precarity within academic research means that even if these rules are eventually rolled back or legally checked, the temporary chaos will have permanent repercussions. Talented researchers will leave the public sector entirely, baseline data collections will be permanently corrupted, and public tax dollars already invested in half-completed research will be wasted. Projects cannot simply be placed on ice and restarted years later; a broken chain of data or a disbanded research team represents a permanent loss of scientific capability.

#### **[200.332] First Amendment Infringements and Public Safety Risks**

Perhaps the most dangerous and immediately destructive elements of the proposed guidance are the clauses governing public communication and organizational liability. The draft rule introduces provisions under § 200.332 requiring pass-through entities to police and monitor the public statements and actions of subrecipients, ensuring they do not take actions—a term left undefined, and plainly broad enough to encompass public speech—that could “significantly damage the reputation of the pass-through entity, the Federal agency making the award, or the Federal Government.” This represents an extraordinary expansion of the bureaucratic state that carries severe First Amendment implications and will inflict a massive chilling effect on protected speech throughout the American public sector.

As a public-facing science communicator, my primary responsibility during rapidly unfolding emergencies is to translate complex, real-time data into clear, unfiltered, and actionable public safety information. During acute crises—such as severe weather events, catastrophic wildfires, or public health outbreaks—the public relies on trusted experts with specialized topical and geographic knowledge to provide objective assessments. Under the proposed rules, if a public university scientist, extension specialist, or state-level researcher were to (for instance) publicly point out that a federal agency’s disaster response is lagging, that an official flood model is underestimating local impacts, or that federal policy is misaligned with observed physical realities, that speech could be legally construed as “damaging the reputation” of the federal government.

The credible threat of immediate fund termination or systemic federal sanctions will effectively silence experts precisely when the public needs them most. Forcing communication by researchers and scientists to run through a multi-layered ideological filter introduces not only lengthy bureaucratic delays, but even more concerningly raises the specter that whatever makes it through will be politically sanitized and potentially misleading—with considerable potential to yield costly, and even deadly, consequences. When a wildfire is on the verge of overwhelming a neighborhood or a flash flood is sending a wall of water toward an isolated community, an even minutes-long delay means a failure to warn those in harm’s way. The American Meteorological Society (AMS) has explicitly emphasized the gravity of these communication channels, reinforcing that unhindered, authoritative, and rapid dissemination of scientific information by expert grant recipients is fundamental to national disaster preparedness, local resilience, and the protection of human life.

### **[200.461, 200.454, 200.432, 200.202(e), 200.206] Erosion of Open Access and Global Competitiveness**

The proposed guidance further suffocates the entrepreneurial spirit and collaborative nature of American science through restrictive cost accounting changes in § 200.461 and § 200.454. These provisions target the dissemination of scientific findings by prohibiting Article Processing Charges (APCs) and open-access journal publication fees from being charged directly to federal grants unless specifically required by federal statute or approved in advance by the awarding agency on a case-by-case basis. They additionally restricts the use of grant funds for professional society memberships and, under § 200.432, academic conference attendance.

This creates a bizarre and highly inefficient structural contradiction: while grantees are legally mandated to widely disseminate their federally funded findings, OMB is actively erecting a financial paywall around that very science. Restricting open-access publishing directly conflicts with multi-administration federal mandates designed to make taxpayer-funded research freely accessible to the public. Further, isolating American scientists from professional societies and

global conferences throttles the collaborative exchanges that drive technological innovation. This isolation is compounded by updates to the risk-review process under § 200.206—and new restrictions on international elements of research and development awards under § 200.202(e)—which heavily restrict international scientific collaborations based on vague, subjective assessments of organizational affiliations. Atmospheric patterns, severe weather systems, and infectious diseases do not halt at international borders. Throttling international partnerships cuts American scientists off from vital global data networks, severely compromising our domestic disaster preparedness and global surveillance capabilities. By torpedoing scientific independence and restricting international data sharing, this rule directly compromises American competitiveness on the global stage in vital science and technology sectors.

### **[General; 200.305] Rebuttal of OMB's Stated Rationales**

OMB asserts that this overhaul is designed to increase transparency, clarify the regulatory status of its guidance, and reduce administrative burdens. In reality, the proposed framework achieves the exact opposite of all three stated policy outcomes:

- **Transparency is destroyed:** A transparent, merit-based system is replaced by an opaque, partisan black box.
- **Administrative burden is expanded:** New compliance mandates—including mandatory written justifications for every payment drawdown by non-state recipients (§ 200.305)—will divert millions of hours from research to administrative gridlock.
- **Efficiencies are undermined:** The threat of political sanctions will dismantle long-standing partnerships, costing the government significantly more in the long run.

### **[General] Rushed Timeline, Premature Agency Action, and Deficient Remedies**

The 45-day public comment period allowed for a regulatory overhaul of this magnitude is entirely inadequate. This proposed guidance does not merely tweak administrative accounting definitions—it structurally reshapes the entire financial assistance framework across nearly every single federal grantmaking agency in the United States government. Forcing research institutions, local governments, and independent scientists to thoroughly evaluate, operationalize, and respond to such a sweeping, transformative rewrite within this compressed timeframe is procedurally reckless. Indeed, 323 organizations have formally requested that OMB extend the comment deadline to August 27, 2026.

Compounding this procedural failure are deeply alarming indications that specific federal agencies are already prematurely forcing these proposed changes into practice before the public comment window has even closed. Independent tracking data and press reporting reveal that major funding entities, such as the National Science Foundation (NSF), have awarded significantly fewer grants and lower overall funding values compared to historical baselines at this point in the fiscal year. This and other recent evidence points to an active “slow-walking” of the existing grant pipeline, and even outright cancellation of current or pending grants, driven by ad-hoc, pre-issuance political vetting of awards by agency political appointees pursuant to Executive Order 14332—effectively piloting this rule’s political checkpoint mechanisms in advance of any notice-and-comment rulemaking.

This premature implementation is causing immediate, severe contraction across the research sector. Academic programs are actively being forced to shut down, critical monitoring projects are stalling, and early-career scientists and technical staff are already losing their jobs as laboratories downsize under artificial funding bottlenecks.

Consequently, any downstream administrative or judicial remedies for the direct harms of this rule are profoundly inadequate. Once the continuity of multi-year longitudinal studies is interrupted, technical talent is driven permanently out of the public sector, or real-time public emergency communications are chilled by partisan delays, the structural damage is irreversible. No subsequent regulatory rollback or court decision can retroactively piece back together a collapsed public science infrastructure or undo the preventable loss of life and property resulting from muted public warning networks.

### **[General] Conclusion**

This proposed rule is a fundamental and highly dangerous rewrite of how the United States federal government interacts with the scientific enterprise, state and local authorities, and public institutions. It seeks to replace a highly successful, decades-old, nonpartisan engine of merit-based innovation with a top-down partisan political control apparatus that injects itself into every single stage of the federal funding lifecycle. It directly threatens scientific independence, imposes severe chilling effects on protected public speech, and introduces widespread operational chaos into the nation's premier research institutions.

The collective impact of these changes represents an extreme departure from decades of bipartisan deference to scientific expertise and the autonomy of local and state governments to protect and inform their own citizens. It would plausibly entail widespread harm to public safety, severely diminish the reputation and competitiveness of the United States on the international stage, and permanently damage the structural viability of American science writ large.

I join leading societies, including the American Physical Society and the American Meteorological Society, in expressing profound alarm. I urge the Office of Management and Budget to withdraw this proposed rule in its entirety.

Respectfully submitted,

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