



**Proposed Office of Management and Budget Regulation
for Federal Financial Assistance – Your Voice Needs to Be Heard!**

June 2026

ABRF Members Call to Action:

The ABRF Executive Board is taking a unique step strongly encouraging all ABRF members to act by providing comments directly on these proposed regulations (the link to submit an official comment is [here](#)). Within your personalized comments, below are several recommendations on what to include from your perspective, as an individual scientist or researcher, a university or research institution, as well as how you can help ABRF increase the strength and impact of ABRF's comments (which will be shared with the community).

Scientists and Researchers

- Describe a specific grant you hold or have held and explain precisely which proposed provision would have prevented it from being awarded or would terminate it now
- Explain concretely what journal subscriptions or publication fees you use grant funds for and what the research cost would be if they were eliminated
- Describe international collaborations on your grants and explain what scientific capability would be lost
- Detail the negative impact of lack of travel support would have on scientific collaboration, discovery, or advancement
- Cite the specific section numbers (§200.205, §200.340, §200.454, etc.) — specificity matters
- *Prior to submitting your letter as an employee, be sure to review any relevant policies or procedures that may exist within your institution*

Universities and Research Institutions

- Calculate the dollar value of grants that would be at risk from the discretionary termination provision and include the number in your comment
- Document the administrative cost of E-Verify compliance across your institution and the disproportionate impact on researchers on work visas
- Identify specific ongoing multi-year grants that would be retroactively exposed to termination for “national interest” reasons
- Argue that the guidance-to-regulation conversion violates the APA’s notice-and-comment requirements and that the rule is arbitrary and capricious
- Advocate for your employees to submit individualized letters while providing guidance on content and layout

For comments that apply to a single facility, a cancer center, or all Core facilities, you may want to include key facts about your work, including the numbers of:

- Grants you support
 - Users and labs you advise
 - Scientific papers you facilitate
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- Describe how you leverage federal funds to advance your work through participation at professional conferences
 - How you access federal funds (i.e., instrumentation grants) to acquire instruments for your facility

Planned ABRF Response to the proposed changes to the Uniform Guidance

ABRF continues to participate in [Research!America’s](#) ongoing efforts to share strategies and insights on how to address the challenges presented by the proposed rule. We will distribute new information or recommendations to all ABRF members as quickly as possible.

ABRF will also be submitting its own response to the proposed changes to Uniform Guidance. Your assistance is needed to help us maximize the impact of ABRF’s response. ***Please find below a link to a survey that will inform us about the specific negative impact this will have on ABRF and our members, notably by documenting the number of members who attend the ABRF meetings (both the Annual Meeting and Chapters) using grant funds to pay for related expenses (travel, accommodations).*** We will be including other pertinent details to bolster our position and increase the impact of our comments.

Survey link (please complete only once):

<https://www.surveymonkey.com/r/OMBImpact>

Please note:

- The volume of responses with specific, personal examples will be most impactful
- Form letters and mass-signatory letters are much less impactful and should be avoided
- Your comments can be anonymous
- The deadline is **July 13, 2026**, 11:59pm Eastern Time
- Contact your Senators and Representatives and explain your position to the new rules and regulations. Assistance for this may be found here: [Stand up for Science](#).

Additional Resources:

Link to proposed rule:

<https://www.regulations.gov/document/OMB-2026-0034-0001>

Link to submit comments:

<https://www.regulations.gov/commenton/OMB-2026-0034-0001>

Guidance on submitting comments:

<https://www.regulations.gov/commenting-guidance>

Substack on How to Stop the new OMB rule:

<https://elizabethginexi.substack.com/p/what-we-need-to-do-next-ombs-proposed>