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July 9, 2026

Submitted electronically via www.regulations.gov

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

Re: Comments on the Proposed Rule, Regulation for Federal Financial Assistance
Docket No. OMB-2026-0034; RIN 0348-AB81 (lead)
91 Fed. Reg. 32198 (proposed May 29, 2026); Comment Deadline: July 13, 2026
Proposed Effective Date: October 1, 2026

Dear Director Vought:

The Association of Biomolecular Resources (ABRF) includes more than **4000** members from over **400 research institutions** across the United States, collectively operating **thousands of shared research resource laboratories or core facilities (SRRs)** that serve as the **technological and intellectual backbone** of the nation's research enterprise.

We write with serious concern regarding the Office of Management and Budget (OMB's) proposed rule revising 2 C.F.R. Part 200 (Docket OMB-2026-0034), open for public comment through July 13, 2026. We raise significant concerns about the following provisions:

- § 200.205 — Political pre-issuance review
- § 200.340 — Discretionary termination authority
- § 200.202(e), § 200.220 — International collaboration restrictions
- § 200.300 & § 200.218 — DEI and disparate-impact restrictions
- § 200.205 & § 200.300 — Training grants (T32, F31, F99)
- §200.421, §200.432 & §200.461 — Scientific Communication and Professional Engagement

We submit that this proposed rule must be withdrawn in its entirety, for the reasons outlined below.

Our member institutions collectively support over **$20B in federally funded research annually** and serve **thousands of investigators and trainees**. SRRs are not peripheral administrative conveniences; they are **foundational infrastructure upon which the nation's competitive advantage in science and technology depends**.

SRRs are vital infrastructure for U.S. research, linking federal funding, institutional capacity, and scientific output. By providing broad access to advanced technologies and expert support, they help investigators use cutting-edge tools without each lab having to bear the full operating and maintenance cost. Additionally, SRRs reduce duplication and promote the efficient use of physical space and resources needed to house instrumentation, technologies, and services that are both essential to current research, and enabling rapid scientific advancement and discovery.

SRRs drive innovation by:

- **Expanding access** to costly technologies like sequencing, mass spectrometry, imaging, computing, and biostatistics.
- **Speeding research** through standardized methods, high-throughput workflows, and expert troubleshooting.
- **Maximizing federal investment** by ensuring expensive equipment and specialized expertise are widely and efficiently used.
- **Enabling high-risk, high-reward science** by lowering barriers to exploratory and interdisciplinary work.
- **Supporting translation and commercialization** by helping researchers and startups generate validation data and advance discoveries toward clinical and market applications.

They have been critical to major advances in areas such as **cancer genomics, rare disease discovery, COVID-19 research, cryo-EM, neuroscience, drug discovery, biomarker development, single-cell biology, regenerative medicine, and clinical/population research**. In short, SRRs are not just support services, they are **strategic engines of innovation, research and financial efficiency, and long-term scientific sustainability**, often powering major breakthroughs behind the scenes.

The proposed rewrite risks creating **regulatory ambiguity and unintended compliance burdens** that could undermine SRR sustainability, increase research costs, and reduce research competitiveness—contrary to federal interests.

The proposed rule includes several provisions that would affect the research community, including SRRs:

- § 200.205 — **Political review of every discretionary grant:** The proposal would require agencies to designate senior political appointees to conduct pre-issuance reviews of

discretionary grant awards to ensure alignment with Administration priorities and applicable executive orders.

- § 200.340 — **Expanded authority to terminate grants:** Agencies would be given broad authority to terminate grants after they are awarded if they are determined to no longer align with agency priorities, program goals, or the national interest.
- § 200.202(e), § 200.220 — **New restrictions on international research collaboration:** The proposal would prohibit agencies from issuing research and development awards directly to foreign entities unless specifically authorized by statute or approved by senior leadership.
- § 200.300 & § 200.218 — **DEI and disparate-impact restrictions:** The proposal includes expanded applicant and award recipient review criteria, additional reporting and oversight requirements, mandatory E-Verify participation for recipients and subrecipients performing work in the United States under federal awards, and provisions tied to several executive orders issued in 2025, including restrictions related to DEI activities.
- § 200.205 — **Training grants (T32, F31, F99):** Require a more formal, auditable, and policy-aligned model of training and workforce development. Activities that were once handled informally may need clearer justification, stronger documentation, and tighter linkage to federal award purposes and institutional risk management.
- §200.421, §200.432 & §200.461 — **Restrictions related to scientific exchange and publications:** The proposal would require prior federal agency approval for conference attendance costs and would make publication costs, including article-processing charges and open access fees, unallowable unless specifically pre-approved in the award.

Key Concerns Regarding the Proposed Revisions

The proposed revisions to 2 C.F.R. Part 200 would impose substantial operational, financial, and administrative burdens on Shared Research Resource (SRR) cores, with significant downstream consequences for the research enterprise they support. The introduction of senior political review for discretionary awards under § 200.205, coupled with expanded post-award termination authority under § 200.340, would create uncertainty in funding continuity, undermine long-term workforce and equipment planning, and destabilize core cost-recovery models that depend on predictable grant-supported utilization.

The restrictions on international research collaboration in §§ 200.202(e) and 200.220 would impede cross-border scientific partnerships, disrupt data and specimen sharing, and limit access to specialized expertise and services essential to many core-supported projects. In addition, the expanded oversight, reporting, and compliance provisions in §§ 200.300 and 200.218, including requirements related to workforce verification and restrictions tied to DEI-related activities, would increase administrative complexity and divert core leadership and staff effort away from scientific operations, training, and user support. The proposed treatment of training activities

under § 200.205 would require SRR cores to formalize and document functions that are often necessarily flexible and responsive to evolving research needs, potentially constraining high-quality experiential training for students, fellows, and early-career investigators. Finally, the proposed restrictions on conference attendance and publication costs in §§ 200.421, 200.432, and 200.461 would impede scientific exchange, delay dissemination of core-enabled discoveries, and reduce the visibility and impact of federally supported research infrastructure. Taken together, these changes would weaken the efficiency, adaptability, and sustainability of SRR cores and, by extension, diminish institutional capacity to support innovative, collaborative, and reproducible research.

Conclusion

SRRs are not ancillary conveniences; they are foundational infrastructure that enables modern federally funded research. Any revision to 2 CFR Part 200 should recognize their critical role and avoid creating uncertainty that could impair their sustainability, accessibility, and compliance.

We appreciate OMB's efforts to improve federal grants management and respectfully urge careful consideration of the operational realities of shared scientific resources in the final rule.

Sincerely,

Joe Dragavon

Joe Dragavon
President
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