



June 4, 2026

ABRF Statement on Proposed Office of Management and Budget Regulation for Federal Financial Assistance

The Association of Biomolecular Resource Facilities, ABRF, has serious concerns about the recent proposed changes to CFR 200, or Uniform Guidance, initiated by the Office of Management and Budget.

Uniform Guidance is the government-wide framework that governs federal financial assistance, including research grants at NIH, NSF, CDC, BARDA, ARPA-H, and other federal agencies. Public comments are due July 13, and OMB intends for the rule to take effect October 1, 2026. Once a rule is finalized, it has the force of law.

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

- **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.
- **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.
- **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. Some foreign subrecipients and contractors would still be permitted under certain circumstances.
- **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.
- **Additional compliance and oversight requirements:** 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.

- **Changes to award structures:** The proposal would eliminate fixed amount awards and prohibit fixed amount subawards government wide

ABRF is evaluating the full implications of this proposal on the shared research resources community and will submit formal comments by the July 13 deadline. We plan to collect additional information and feedback from the ABRF community on the potential impact of these proposed regulations.

Shortly, we will share additional information and guidance on how to contribute to the comment process, as well as a more detailed analysis of the proposed rule and suggested messaging for ABRF members to adapt for their potential comments.

[Contact us](#) if you have any questions or suggestions.

Thank you.

ABRF Executive Board