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Dear Colleagues:

We, the undersigned past, present, and future presidents of NAVBO, write to encourage you to comment on a new OMB proposal ([OMB #2026-0034-0001](https://www.regulations.gov/comment/OMB-2026-0034-0001)) that proposes significant changes in how NIH research grants are evaluated and administered. There is a very short time window for comment submission (the deadline is July 13), and subsequently the proposed changes can be initiated as early as Fall 2026, so there is urgency in our request. We believe that these changes, if enacted, will dramatically change how science in the US is funded and administered and significantly diminish our imperfect but successful research enterprise.

Note: You can post your comment anonymously.

Note: Several good synopses of the actual document are posted. “Stand Up For Science” (<https://www.standupforscience.net>) links to a page with useful synopses and links for this OMB proposal).

Summary of some major changes:

1. Decisions on grant funding will be made by political appointees who may lack scientific expertise (section §200.205).
2. Government can terminate any research grant at any time without scientific justification (section §200.340).
3. Significant restrictions on foreign collaboration. For example, one cannot propose collaborations with foreign entities that are “covered” (“covered” is undefined but likely at least those adversarial to the US) and cannot collaborate with other foreign entities (i.e. allies) who collaborate with covered foreign entities (section §200.220).
4. One cannot use NIH grant funds to pay for manuscript publication, although it is mandated that we publish research findings in open access format immediately (section §200.454).
5. Conference costs only allowed for meetings explicitly included in the original grant award and approved (section §200.432).

Some actions available to you:

1. Submit a comment by July 13 (link here to post a comment: <https://www.regulations.gov/comment/OMB-2026-0034-0001>). Do not use a template, as templated comments are bundled for counting purposes. It can be as easy as a short paragraph describing how one of the changes will affect your research and the research of your colleagues. You may submit a longer comment that addresses in turn the major changes as you see them. It is helpful to refer to the relevant section of the proposed changes (and include the numbering) —these are listed below. You can choose to comment on one section or multiple sections. One strong comment is recommended over multiple comments from one person. NOTE: anyone can post their comment anonymously (in the above site click on “Document Comments” to see list of comments that have been posted).
2. Contact both scientists and non-scientists in your network and your professional organizations and ask them to post a comment. NOTE: Non-scientist comments are encouraged and can be short

– for example, how they or their families have benefitted from medical treatments.

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3. Contact your representatives in Congress (a template can be used here) and tell them how you feel about this OMB proposal in succinct language. An email template is available here: <http://advocacy.charityengine.net/Default.aspx?isid=1061>.
4. Talk to your colleagues and others and explain your position(s).

We thank you in advance for reading our heart-felt letter and for whatever efforts you can make at this time. We believe that all input will be useful now and perhaps in the future, including a record of the number of comments and their content. Thank you!

Relevant sections of the proposal:

- §200.205 — Political appointee review of grants
- §200.340 — Grant termination
- §200.432 — Conference attendance pre-approval
- §200.454 — Journal subscriptions (would be unallowable)
- §200.461 — Publication costs (would be unallowable)
- §200.300 — DEI and gender ideology prohibitions
- §200.218 — Disparate-impact research banned
- §200.220 — Foreign collaboration prohibition
- §200.202 — Programs must align with administration priorities
- §200.204 — Grant competitions can be exempted from public notice

Sincerely,

- Masanori Aikawa, NAVBO President 2020-2021
- Victoria Bautch, NAVBO President 2012-2013
- Michelle Bendeck, NAVBO President 2018-2019
- Joyce Bischoff, NAVBO President 2015-2016
- Ondine Cleaver, NAVBO President 2019-2020
- Paul DiCorleto, NAVBO President 2002-2003
- Jason Fish, NAVBO President 2024-2025
- Cecilia Giachelli, NAVBO President 2017-2018
- Courtney Griffin, NAVBO President, 2021-2022
- Karen Hirschi, NAVBO President 2014-2015
- Timothy Hla, NAVBO President 2011-2012
- Christopher Hughes, NAVBO President 2022-2023
- Klaus Ley, NAVBO President 2013-2014
- Mark Majesky, NAVBO President 2008-2009
- Bill Muller, NAVBO President 2004-2005
- Wayne Orr, NAVBO President 2025-2026
- Gary Owens, NAVBO President 1998-1999
- William Sessa, NAVBO President 2010-2011
- Cynthia St. Hilaire, NAVBO President 2026-2027