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Re: OMB-2026-0034, Regulation for Federal Financial Assistance

Dear Director Vought:

Thank you for the opportunity to comment on the proposed revisions to the Uniform Guidance for Federal Financial Assistance, 2 CFR Part 200 (OMB-2026-0034; 91 FR 32198).

About the North American Vascular Biology Organization.

The North American Vascular Biology Organization (NAVBO) is a 501(c)(3) non-profit organization that provides a forum the study of vascular biology. It supports medical practitioners who study the pathogenesis and treatment of human diseases such as heart disease and stroke, and vascular biologists who study the health and disease of blood and lymphatic vessels using approaches such as structural/molecular biology, cell biology, and physiology. The purpose of NAVBO is to promote, advance, and disseminate information and knowledge related to the scientific field of vascular biology and its interface with human medicine and disease. These purposes are achieved primarily through the support of educational activities and scientific meetings, activities that crucially support a pipeline of students and young investigators who will produce the cures of the future. Some NAVBO-supported activities are funded, in part, by grants through the National Institutes of Health.

How the proposal would affect NAVBO.

This proposed changes to the OMB Guidance for Federal Financial Assistance would harm NAVBO and our membership by limiting the number of opportunities for early-stage investigators within the vascular biology field, including the ability to attend our online events and in person conferences. These activities would cease to exist without membership dues, conference attendees, and career development opportunities. The loss of this source of talent going forward will prevent the United States from keeping its place at the forefront of scientific discoveries and new treatments.

Key concerns.

1. Pre-approval for conference registration would have a detrimental impact on the society's structure and dissemination of scientific results.

The Rule's section **§200.432(b)** introduces restrictions on the use of funds for conference participation unless express authorization is given in award terms and conditions. The current OMB rule already requires conference attendance to be necessary and reasonable for award performance. Therefore, we urge you to withdraw this proposed section in its entirety.

As mentioned above, NAVBO's mission is primarily carried out through the support of educational activities and scientific meetings, namely our annual Vascular Biology conference. In 2025, 58% of NAVBO's income was generated through event registration fees and used to support those conferences. Approximately 95% of NAVBO's conference participants are academic scientists, who typically heavily rely on government funding for conference participation. The results of active federally funded projects are presented during the meeting. Notably, 57% of survey respondents from the Vascular Biology 2025 meeting stated that the presentations provided new data with some review of existing data and 28% stated that the presentations provided primarily new, unpublished data.

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If this rule is implemented as stated, NAVBO will likely lose the ability to hold annual conferences, therefore impacting the dissemination of scientific knowledge within vascular biology. Scientific collaborations often lead to exciting new discoveries and treatments for disease, and conferences supported by NAVBO provide an avenue for new and continued productive collaborations. Approximately 83% of survey respondents from the past six NAVBO-sponsored conferences said that they were likely to exchange resources and/or data, and an overwhelming **96% of respondents reported that they were likely to collaborate with a colleague they met at the meeting**, testifying to the impact of these meeting interactions.

Additionally, the mission of NIH is to support the education and development of early-stage investigators. The conference registration pre-approval process would heavily impact the ability for the next generation of vascular biologists to attend scientific conferences. NAVBO conferences are made up of approximately 50% trainee participants (students and postdoctoral fellows). If this rule were to go into effect, any trainee joining a lab after the original grant (which could already have been active for multiple years), would not be approved to attend a conference. Therefore, young investigators would not get the opportunity to attend meetings unless amendments to the award terms and conditions are filed, causing a significant impact on our society's conference registration rates. This would cause a significant administrative burden for the investigator, the institution, and the funding agency's staff. Further, opportunities to present work, build networks, and gain recognition (all important aspects of grant funding and award performance) are provided at conferences. Approximately 20% of meeting participants attend a trainee-focused pre-conference meeting at Vascular Biology meetings. The career development sessions throughout the conference are also consistently well attended. The implementation of this OMB rule would hinder the ability for trainees, who are the future of science in the United States, to participate in these critical career development opportunities.

Importantly, award terms are fixed before conference schedules exist, and event-by-event written approval would cause a burden to the administration of scientific research institutes, federal agencies, and professional organizations. For example, the location for Vascular Biology 2027 was finalized in April 2026. Were this rule in place already, Vascular Biology 2027 would have been ineligible for inclusion in grant applications submitted prior to April 2026. Science evolves, and grantees should not be tied down to a specific conference but one that fulfills their needs at the relevant time. For Vascular Biology 2027, speakers were confirmed in May of this year with a team of organizers that are up to date on the latest scientific advances. The organizers worked to create a roster of talks relevant to emerging topics in vascular biology. The OMB rule, if enacted, would force our organization to recruit speakers and sign contracts continuously for meetings happening 5 years in the future for inclusion in grant applications, creating an administrative burden for staff, organizers, and speakers. This approach would also commit grantees to attending meetings that may no longer be relevant to their federally funded work in a few years' time - opposite to the goal of this proposed change.

Finally, the language in this section is vague and warrants further explanation. For example, series of conferences are often viewed as individual conferences due to location, timing, themes, and speakers. The proposed change does not provide clarification on whether all conferences would need to be included on conference grant applications or if simply stating the series would be sufficient for pre-approval. The rule as stated would not reduce burden on grantees. In fact, it would increase administrative burden on multiple levels—completely going against the rationale for this rule.

Recommendation: Complete withdrawal of the revisions in **§200.432**. Retain current allowable costs for conference costs under existing thresholds.

2. Pre-approval of membership dues

Section **§200.454(a)** - the proposed Rule change would only allow membership dues to be used from a



federal award if necessary to fulfill award requirements and approved in advance. As stated, NAVBO runs educational activities to fulfill its mission; membership dues (currently allowable as indirect costs on some federally awarded grants) are used to fund the educational activities and benefits of our members. NAVBO hosts over 50 online events a year. In 2025, virtual NAVBO events received over 7,000 registrations. NAVBO Online events, such as webinars and symposia (scientific sessions) and career development forums help achieve the goals of federally funded work. These events will cease to exist or be severely limited without the revenue from membership dues. Additionally, advanced approval of membership dues will likely lead to a dramatic drop in membership, especially for trainees and junior investigators who most benefit from NAVBO's activities. The approval process to redirect the cost of membership from already established methods would be a heavy administrative burden for scientific institutions and our society.

Furthermore, membership dues are low-cost relative to the value they provide to award performance. Currently NAVBO membership for faculty personnel costs less than the value of attending one NAVBO webinar per month; trainee membership is less than the cost of three monthly webinars. Additionally, membership provides an online community of vascular biologists where collaborations can be formed, and the member-exclusive NAVBO Mentoring Program is hosted. This program is designed to achieve training goals outlined by federally funded grants. Overall, membership dues allow NAVBO to support scientists so they can achieve the goals of federally funded awards.

Recommendation: Complete withdrawal of the revisions in **§200.454**. Retain current allowable costs for professional memberships under existing thresholds.

Conclusion.

The North American Vascular Biology Organization encourages and supports efforts to strengthen the scientific enterprise in the United States. However, the proposed rule as written conflicts with existing authorities and the rationale for pursuing this regulation: reducing recipient burden and ensuring American tax dollars are not wasted. As written, the provisions outlined above would introduce damage to professional and/or scientific organizational structure which will last beyond any single administration. The effects will create harm to the conduct of scientific research and transfer of scientific expertise to future generations of scientists.

We strongly urge OMB to withdraw the rule as written; in particular, withdraw the proposed sections that would hinder dissemination of research results through conferences (**§200.432**) and professional memberships (**§200.454**). Thank you for considering these comments.

Sincerely,
North American Vascular Biology Organization Leadership