

Public Comment Guide: Tell OMB to Abandon a Rule that Gives Political Appointees Final Say on Research Funding

On May 29, 2026, the White House's Office of Management and Budget (OMB) [proposed a rule](#) that would allow political appointees to have the final say in deciding how to distribute billions of dollars of funding for federal research. The proposal replaces scientific merit with a political loyalty test that could be used to silence research that might produce results that are inconvenient for the administration. If this rule were enacted, the administration could deny research grant applications related to life-saving issues like vaccine safety, climate science, and LGBTQ+ health, which have all been under attack by President Trump. Public comments help build a record of evidence not considered in the rule, as well as detailed perspectives on the potential outcomes if the rule is implemented as written.

The proposed rule from OMB would make the following sweeping changes to several aspects of the federal funding process:

- Consolidate power to federal agencies, who would be given more leeway to restrict funding eligibility to certain types of organizations and institutions, and to consider an applicant's history and organizational "affiliations" in determining whether they're eligible for federal funding (§200.206);
- Allow political appointees (not subject matter experts) primary discretion over who gets funding for federal research (§200.340), and render merit review of grant applications merely "advisory" (§200.205(d));
- Create additional barriers for projects that involve international collaboration (§200.220);
- Limit dissemination of federal funding to research aligned with the "President's policy priorities," and explicitly deny outright any funding applications related to DEI or the transgender community (§200.300);
- Make federal funding vulnerable to cancellation at any time with no explanation (§200.340); and
- Restrict conference attendance related to, and any public communication of, only the federally funded research findings deemed allowable by a political appointee (§200.421).

For more resources to help inform your individual comment, see a UCS [press release](#) and [blog](#) on this proposed rule. Dr. Elizabeth Ginexi (a former National Institutes of Health official) has also written a [comprehensive summary](#) of the rule's implications for research.

[Follow these steps to submit a comment](#)

Written comments must be submitted to the regulatory docket by July 13, 2026, at 11:59 PM ET.

1. Go to the [public comment page](#) on Regulations.gov for the proposed policy (docket OMB-2026-0034-0001).
2. You may write your comment directly or copy and paste your comment into the website. Alternatively, you can upload a document. If you upload a document, make sure all documents contain your name and contact information if you are comfortable with that. There are some useful public comment tips at the end of this guide.
3. Once you submit your comment, check your email for a confirmation of submission.
4. If you can, please let us know if you commented [here](#).

Some key topics for your public comment

Choose one or more of the following key points in the rule and use your own experience to craft a comment giving evidence to support the arguments UCS and allies have identified. **Remember, you do not have to cover everything. We suggest you focus on one or two areas where you can provide unique evidence/detail, and pay special attention to bolded areas. When writing your comment, note the specific section number related to your concerns (marked with a §).**

1. OMB is neglecting scientific merit (§200.205(d)) and innovation to advance the “President’s priorities” (§200.340)
 - a. Historically, federal funds are awarded based primarily on scientific merit and how well applications align with federal agency missions and programs. If the proposed rule is implemented, however, federal funding eligibility would be dependent on how well projects “demonstrably advance the President’s policy priorities,” including ideologically driven, not scientifically informed, goals. This would essentially make receiving federal funding for entire areas of research impossible.
 - b. The proposed rule explicitly calls out a few examples of topics that go against the “President’s priorities” that would be disqualified from receiving federal funds, including research associated with diversity, equity, and inclusion (DEI) and the transgender community. Through its [actions and public statements](#), the second Trump administration has also shown which additional topics are at risk of disqualification from federal funds. Prohibition of specific [topics](#) has already [constrained](#) federal agency communication and work. This same list has been used to terminate [thousands of federal research grants](#), throwing scientists’ projects and careers into jeopardy. The administration has targeted projects related to climate science, clean energy, vaccine technology and safety, health inequities, and more.
 - c. **Commenters should urge OMB to encourage federal funding dissemination based on scientific merit and innovation, not what will best serve the President, his administration, and their personal or financial interests. Commenters should highlight how personally relevant or important research has been or will be targeted by the administration, and the implications for public and environmental health or other areas in your expertise or interest.**

2. OMB must leave funding decisions to the experts, not politicians (§200.205(d))
 - a. For decades, federal research funding has relied on merit review, transparency, and scientific judgement. Subject matter experts systematically and transparently review funding applications and career scientists and program officers take their judgments into account when ultimately deciding which applications receive funding. This system prioritizes expertise and independent science.
 - b. If implemented, the proposed rule would render peer review of grant applications as merely “advisory,” giving political appointees unfettered discretion to decide what applications receive funding. This would mean that officials politically appointed, sometimes by the President himself, would have the authority to deny funding based on applicants’ political loyalty and affiliation, with no reference to the best available science.
 - c. **Commenters should urge OMB to leave funding decisions to the independent experts within federal agencies, not to political appointees with no qualifications to assess the**

merit of applications. Commenters should highlight how political officials with loyalty to the President may target personally relevant or important research in their decision-making at the expense of the public good, economic benefits, and innovation.

3. OMB should **not** limit funding eligibility based on organizational affiliation or type (§200.206)
 - a. The proposed rule would give political appointees and federal agencies the authority to deny funding based on a new, expanded approach that determines whether an applicant poses a risk to a program’s reputation, the Federal government, or the United States as a whole. Previously, these decisions were narrowly focused—for example, whether the applicant (or their institution) was a financial risk, was previously guilty of a serious crime, or could be considered as advocating for the overthrow of the US government. The proposed rule now suggests that anyone on record disagreeing with any formal statement of policy (including an Executive Order that the administration now asserts to broadly have the weight of Federal law) could be disqualified under this principle. Researchers or their institutions or institutional partners who work on issues including trans rights or health, environmental justice, or virtually any gender- or inequality-related topic may be denied funding or lose their existing funding.
 - b. **Commenters should urge OMB to align grant and funding reviews with the First Amendment’s protections on free speech and base funding decisions on the advancement of evidence-backed research and scientific innovation. OMB should abandon the proposed criteria and not attempt to impose ideological requirements on grant eligibility.**
4. OMB is threatening academic freedom and the scientific process (§200.421)
 - a. Researchers who are awarded federal funding through this new system would also be constrained by additional political oversight. Any public communication about a federally funded study, such as presentations at conferences or in the media, would need to be approved by political appointees. In practice, this means that funded researchers whose projects followed the science but led to findings in censored areas (for example, research on flooding and infrastructure that is clearly impacted by climate change-related variables), could be prohibited from sharing those findings.
 - b. **Commenters should urge OMB to abandon a rule that would encourage censoring of scientists who follow the scientific protocols and processes of their funded grant proposals. Commenters should offer evidence of the importance of academic freedom.**

Additional Resources for your comment:

- a. A [blog](#) by Dr. Alexa Dietrich about how this rule directly threatens independent science.
- b. [UCS resources](#) on how to participate in federal rulemaking.
- c. [This report](#) on six months of Trump administration attacks on science.
- d. [A collection of blog posts](#) by Dr. Jules Barbat-Dajches highlighting attacks on science under the Trump administration.

Tips for Writing a Comment

The most effective comments are thorough, unique, and specific. **If you are a researcher or scientist that has received or currently receives federal research funding, indicate this in the comment, if you feel comfortable doing so.** The public comment process allows the public to help agencies understand the full range of consequences of a proposed rule. The information in public comments can also be used as evidence for any future court challenge.

Some additional best practices:

- Read the [background](#) of the rule and the [summary](#) of proposed changes to understand the context of the agency's current proposal.
- Write concisely, but lay out and provide evidence for facts the agency has ignored or overlooked.
- Describe the personal and/or community-level impact of the proposed rule, including how it will affect US scientific research and public health and safety. Explaining how the proposed rule would impact your own or your organization's research is especially important.
- Address potential negative impacts, flaws in OMB's justifications for its proposals in the rule, overlooked impacts, and intended or unintended consequences. When available, attach key studies and research to your comment (at a minimum, cite them) so they are on the record.
- It is not sufficient to simply disagree with the agency's policy judgments. Explain why you disagree and be as specific as you feel comfortable being.