



American Society for Nutrition
Excellence in Nutrition Research and Practice
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July 10, 2026

Andrew Reisig
Joel Savary
Office of Federal Financial Management
The White House Office of Management and Budget

Re: Regulation for Federal Financial Assistance; Docket No. OMB-2026-0034-0001

Dear Mr. Reisig and Mr. Savary,

The American Society for Nutrition (ASN) appreciates the opportunity to provide input on the revised Uniform Guidance for Federal Financial Assistance related to the management of grants, cooperative agreements, and other forms of assistance. Established in 1928, ASN is a not-for-profit organization dedicated to the mission of advancing the science, education, and practice of nutrition. ASN's more than 9,000 members work across government, academia, clinical practice, and industry to advance the Society's vision of "A Healthier World Through Evidence-Based Nutrition." ASN also publishes four of the field's leading peer-reviewed journals: *The American Journal of Clinical Nutrition*, *The Journal of Nutrition*, *Advances in Nutrition*, and *Current Developments in Nutrition*.

ASN members are recipients of federal research funding from agencies including the National Institutes of Health (NIH) and the U.S. Department of Agriculture (USDA), and many also serve on federal grant review panels. ASN has grave concerns that converting the Uniform Guidance from non-binding guidance into binding federal regulation, together with the proposed revisions, would fundamentally undermine the U.S. research enterprise and weaken the nation's longstanding leadership in science, technology, and innovation. While ASN supports efforts to improve transparency, accountability, oversight, and reduce administrative burden, many of the proposed changes would instead increase administrative complexity, diminish the role of scientific expertise, and impede the collaboration and exchange of knowledge that drive scientific progress. Collectively, these changes would have far-reaching consequences for the U.S. research enterprise, including the field of nutrition science, with downstream effects that weaken public health and chronic disease prevention. Nutrition science underpins every major federal health initiative, from NIH clinical trials to U.S. Food and Drug Administration (FDA) regulatory decisions. Nutrition research is foundational to chronic disease prevention, maternal and child health, food safety and dietary guidelines, Medicaid and Medicare cost containment, and national security and workforce readiness.

ASN Responses to Select Sections of the Regulation are Italicized Under the Bolded Relevant Section Number in Brackets

[Section 200.202—Program Planning and Design]

[(f) *Multi-year awards.*]

Multi-year appropriations for federal funding could reduce administrative burden, provide greater funding stability, and support longer-term strategic planning. However, if a larger share of available appropriations is committed to existing multi-year awards, federal agencies must ensure that sufficient funding remains available to support new grants each year. Maintaining a robust pipeline of new research awards is essential to sustaining scientific innovation, fostering new ideas, supporting the next generation of investigators, and enabling independent research that validates, challenges, and builds upon prior findings. Scientific progress depends not only on the continuation of promising research, but also on the continual introduction of new investigators and new approaches to promote rigor, reproducibility, and the advancement of science. If new funding is unavailable because all funds are tied to existing multi-year awards, opportunities for independent work may be delayed for years, slowing scientific progress, reducing the efficient use of federal research investments, and diminishing U.S. competitiveness. ASN requests that this section be rescinded or modified accordingly.

[(g) *Awards for scientific research.*]

Many research projects span multiple categories, incorporating elements of basic research, applied research, experimental development, and other research models. Accordingly, if research awards must be categorized according to the definitions in OMB Circular A-11, investigators should be permitted to select more than one category to accurately reflect the full scope and objectives of their research. ASN requests that this section be rescinded or modified accordingly.

[Section 200.205—Federal Agency Review of Merit of Proposals]

Section 200.205 should preserve the longstanding principle that research proposals are evaluated through rigorous, independent peer review conducted by subject matter experts and that funding decisions are driven by scientific merit and research priorities. While senior agency officials play an important role in establishing agency priorities and ensuring overall agency alignment with Administration objectives, assessments of scientific and technical excellence should remain the responsibility of qualified experts with the relevant disciplinary expertise. Federal agency research priorities are appropriately established through strategic plans, budgets, funding opportunity announcements, and programmatic funding decisions. Unbiased peer review should then determine which research proposals best advance those priorities based on their scientific and technical quality. Requiring one or more senior political appointees designated by agency leadership to approve research awards could politicize, or create the appearance of politicizing, the scientific review process, rather than ensuring that scientific merit remains the primary basis for funding decisions. Mandating approval by senior political appointees for every award could delay the approval process and also risk undermining scientific integrity, reducing transparency, and eroding public trust in the federal research process.

The federal research enterprise has historically balanced Administration priorities with scientific independence through strategic planning, funding opportunity announcements, advisory council oversight, and expert peer review. This framework enables agencies to advance national priorities while ensuring that funding decisions are informed by scientific merit, fostering innovation and supporting the high-quality research that has made the United States a global leader in science. Expanding the role of political review in funding decisions could disrupt this balance and risks weakening the integrity, credibility, and effectiveness of the federal research enterprise.

ASN supports efforts to strengthen accountability and ensure that taxpayer funds are invested efficiently and responsibly. However, diminishing an independent peer-review process that prioritizes scientific merit does not achieve those objectives. Maintaining expert peer review as the foundation for evaluating the scientific merit of research proposals and informing funding decisions is essential to preserving scientific integrity, growing public trust, and ensuring that federally funded research delivers the greatest possible public benefit. ASN requests that this section be rescinded.

[(d) Use of peer review.]

ASN appreciates that the Administration is not discouraging or preventing the use of peer review in evaluating research proposals and recognizes that peer review recommendations have historically been advisory. However, rigorous, independent peer review conducted by subject matter experts should remain the cornerstone for evaluating the scientific merit of research proposals and should continue to serve as the foundation of the federal research funding process. Expert peer review helps ensure that federal investments support the highest-quality science with the greatest potential to advance knowledge and improve public health. Maintaining a fair, independent, and scientifically rigorous peer review process is essential to preserving research integrity, maximizing the impact of federally funded research and the nation's competitiveness, and sustaining public trust in the federal research enterprise. ASN requests that this section be rescinded or modified.

[Section 200.340—Termination and Suspension]

Research projects that have been competitively awarded through peer review and are making satisfactory progress toward their approved objectives should not be terminated or suspended mid-project at the discretion of a federal agency absent compelling cause. High-quality science requires sustained investigation, continuity of effort, and the flexibility to pursue relevant and innovative findings and promising lines of inquiry as they emerge. In nutrition science, advances often begin with basic, clinical, or population-based observations that must be replicated, validated, and translated over time before ultimately improving public health. Many studies require years of follow-up to produce meaningful and reliable results. This iterative process underscores the importance of stable and predictable support for meritorious research. Researchers need confidence that changes in political leadership will not disrupt funding for existing, competitively awarded research projects that are making satisfactory progress toward their approved objectives. Federal agencies invest significant time and resources in developing funding opportunities, conducting peer review, and overseeing awards. Terminating meritorious

projects without compelling cause undermines both these investments and the scientific advances they are intended to support.

Terminating active research projects prematurely rarely generates meaningful cost savings and often wastes substantial prior federal investments. Such disruptions may compromise commitments, including ethical obligations, to research participants; halt critical data collection; leave early-career researchers and other support staff without work; and forfeit years of foundational scientific progress. Frequent or discretionary termination of competitively awarded research grants creates uncertainty that discourages talented investigators from pursuing research careers, weakens the scientific workforce, and ultimately diminishes the nation's research capacity and global competitiveness. ASN requests that this section be rescinded.

[Section 200.432—Conferences]

Scientific conferences are essential to the dissemination, critical evaluation, and advancement of research. They provide opportunities for investigators to present findings, receive expert feedback, establish collaborations, and accelerate the translation of research into practice and policy. Scientific meetings also allow investigators to obtain critical input that strengthens study design, interpretation, and future research directions before publication, ultimately enhancing the quality, rigor, and reproducibility of federally funded research. For example, ASN's annual meeting, NUTRITION, convenes nearly 3,000 laboratory scientists, clinicians, population health researchers, federal government scientists and research leaders, and other experts from around the world. These interactions foster collaboration, strengthen trust among the scientific community, facilitate the exchange of emerging ideas and funding opportunities, and advance the rigorous, evidence-based science that leads to solutions to today's most pressing nutrition challenges. Scientific conferences can also establish the cross-sector partnerships that accelerate innovation, support technology transfer and commercialization, stimulate business development, and maximize the return on the nation's investment in federally funded research, contributing to U.S. economic growth and global competitiveness.

Scientific conferences are indispensable training environments for graduate students, postdoctoral fellows, and early-career investigators, providing opportunities to present their work, receive mentorship, build professional networks, explore career opportunities, and develop collaborative relationships that sustain the future scientific workforce. Restricting the use of research award funds for conference participation unless expressly authorized in an award's terms and conditions would impede scientific exchange and workforce development, limit interdisciplinary collaboration, delay dissemination of research findings, and ultimately reduce the impact and efficiency of federally funded research and the nation's global competitiveness. ASN requests that this section be rescinded or modified.

[Section 200.454—Memberships, Subscriptions, and Professional Activity Costs]

[(a) Costs of the recipient's or subrecipient's membership in professional, civic, business, and technical organizations]

Participation in scientific and professional organizations, such as ASN, is an essential component of a robust and effective research enterprise. Professional societies facilitate the dissemination of research findings, foster interdisciplinary and cross-sector collaboration, establish scientific standards and best practices, provide professional development and training opportunities, and promote the exchange of ideas that drive rigor and reproducibility, scientific discovery, and innovation.

ASN recognizes that research institutions play an important role in supporting the professional development and engagement of their investigators and should, whenever feasible, provide resources for these activities. However, institutional support alone is often insufficient, particularly for early-career investigators and researchers at institutions with limited resources.

Professional engagement, scientific dissemination, and participation in professional societies are integral components of the research process, not optional extracurricular activities. Networking within scientific societies leads to collaborations that accelerate innovation and maximize the return on the nation's investment in federally funded research, contributing to U.S. economic growth and global competitiveness. Accordingly, ASN appreciates that the revised guidance preserves federal agencies' discretion to allow reasonable, allocable, and project-related professional activity costs when they directly advance the objectives of federally funded research. Maintaining this flexibility will help ensure that investigators can effectively disseminate findings, collaborate with peers, and translate research into public benefits. ASN requests that this section be rescinded or modified.

[(b) Costs of the recipient's or subrecipient's subscriptions to business, professional, academic, and technical periodical]

Journal subscriptions support the timely dissemination and critical evaluation of research findings and are an important component of the scientific process. Restricting the use of research award funds for professional society membership, professional activities, or journal subscriptions, particularly if such costs are allowable only with explicit authorization in an award's terms and conditions, could create unnecessary administrative burden, impede scientific exchange, and weaken collaboration across disciplines and institutions, ultimately diminishing scientific rigor and reproducibility and innovation.

In addition, treating journal subscription costs as unallowable costs could significantly limit investigators' access to scientific literature and impede their ability to remain current with advances in their fields. Ready access to the scientific record is essential for designing rigorous, reproducible studies, interpreting findings in the context of existing evidence, avoiding unnecessary duplication of research, and ensuring that federally funded research meets the highest scientific standards. ASN requests that this section be rescinded or modified.

[Section 200.461—Publication and Printing Costs]

Prohibiting the use of grant funds to support publication costs, including page charges, article processing charges (APCs), or open access fees, would significantly limit researchers' ability to disseminate federally funded findings and share results with the broader scientific community

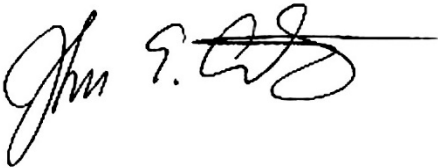
and the public. Publication of research results is essential to scientific communication, collaboration, and the advancement of science in general, including nutrition science and public health. In addition, publications can help to advance innovation and maximize the return on the nation's investment in federally funded research, contributing to U.S. economic growth and global competitiveness.

In its 2022 memorandum, "Ensuring Free, Immediate, and Equitable Access to Federally Funded Research," the Office of Science and Technology Policy directed federal agencies to ensure that taxpayer-funded research is made freely available to the public through peer-reviewed publications. Limiting allowable publication costs would undermine the ability of investigators to comply with these requirements and could hinder the effective implementation of a federal open-access policy.

As a publisher of peer-reviewed, federally funded research, ASN is concerned that this proposal would reduce the impact of federal research investments, weaken U.S. scientific competitiveness, and constrain the dissemination and visibility of publicly funded science. Allowing publication costs as a standard and allowable component of research funding is essential to maximizing the return on federal research investments and ensuring that discoveries are accessible, reproducible, and translated into public benefit. ASN requests that this section be rescinded.

Thank you for the opportunity to submit testimony regarding the regulation for federal financial assistance. Please contact Sarah Ohlhorst, MS, RD, ASN's Chief Science Policy Officer, if ASN may provide further assistance.

Sincerely,

A handwritten signature in black ink, appearing to read "John E. Courtney", followed by a horizontal line.

John E. Courtney, PhD
Chief Executive Officer