



Regulation for Federal Financial Assistance

Elizabeth Lanphier, University of Cincinnati

Dear Mr. Vought:

I am writing as a scholar working within the humanities and academic medicine, and as a concerned citizen, community member, and parent, to provide comment on Proposed Rule: Regulation for Federal Financial Assistance (OMB-2026-0034; FR Doc. 2026-10817).

The proposed rule would usher in sweeping changes to the allocation of over a trillion dollars in federal grants. This would impact not only our academic research enterprises, but also essential shared goods that are important to the well-being of all Americans, like our public schools, public roads, and public assistance programs for basic needs like food and housing.

I am the parent of a child in a Title I public school. I am concerned about the impact of the proposed rule changes on my child's school, and that of many other children across the country whose families rely on schools to provide trusted education, safety, and meals to our children daily. Proposed rules in **Section § 200.300** that would prohibit activities the administration deems related to "diversity, equity, inclusion, and accessibility" undermines the very idea of Title I funding. As defined by [existing policy](#), Title I is designed specifically so that *all* children have an "opportunity to receive a fair, equitable, and high-quality education, and to close educational achievement gaps." Equity is central to the role and function of Title I, as a matter of fairness and equal opportunity. If Title I funds are compromised, this would be a major loss to public schools in Ohio, where I reside, and where most children attend public school. Yet in Ohio the state budget will cover [less than a third](#) of public-school costs, already pushing a huge burden onto property owners to finance public education. Eroding Title I would only put further pressure on Ohio's working middle-class property owners to fund public education, a public good that is owed to and expected of all children in the United States.

Considerations of fairness and equality are core to my expertise and work as a philosopher working within an academic medical setting to support accessible, fair, and just healthcare delivery. I see every day the existing barriers to these goals. I am concerned that these proposed rules will deepen the gap in providing high quality healthcare to all Americans. Health and illness are non-partisan issues, experienced by all individuals, regardless of political affiliation, ideological views, or voting record.

I am particularly concerned that provisions in **Section § 200.300** and **Section § 200.340** that prohibit funding "diversity, equity, inclusion, and accessibility" would disproportionately harm Americans served by rural hospitals that often treat those most excluded from healthcare access. These rural hospitals [rely](#) on federally funded programs like Medicaid that are specifically designed to address inequities in resources, including healthcare resources. Such facilities that function specifically to enhance equity, inclusion, and accessibility of healthcare would be vulnerable to the application of **Section § 200.300**. Under **Section § 200.340**, they could

face discretionary termination of federal funding that keeps healthcare flowing to rural populations, effectively cutting off parts of the population from even emergency healthcare services, let alone the kinds of preventative and ongoing care necessary to keep healthcare costs low, and populations healthy.

As a researcher and scholar, I am also concerned about **Sections § 200.300** and **§ 200.340** as they relate to research and scholarship. The proposed revision indicates that **Section § 200.300** is “intended to prevent discrimination on the basis of federally protected characteristics,” something already upheld by [existing research ethics](#) and [regulations](#), which must adhere to anti-discrimination policies. Introducing the thinly defined concept of “Unlawful DEI” in **Section § 200.300** creates unnecessary confusion about acceptable research inclusion criteria, and may yield less comprehensive research results. **Section § 200.340** would create conditions under which the federal government — the [major contributor](#) to our immense innovations in science, medicine, and the humanities in the United States — would become an unreliable funding partner. Producing “[gold standard](#)” research with high-quality evidence often requires predictable, multi-year funding, and assurance that a study can be carried out from recruitment to completion. The ability of the government to abruptly and arbitrarily terminate awards under **Section § 200.340** would compromise American research excellence as a producer of reliable, longitudinal, large cohort studies or randomized control trials.

I am also deeply concerned about **Section § 200.205**, which contradicts core principles of academic freedom by permitting political appointees, not expert [peer-review](#), to guide funding decisions; **Section § 200.218**, which disallows federal funding of certain research methodologies, allowing ideology rather than expertise to inform research topics and frameworks; and **Section § 200.461**, which directly contradicts [existing federal requirements](#) that federally funded research be open-access by limiting the ability of federal awards to support open-access publishing fees.

As a philosopher working within academic medicine, I work in [interdisciplinary teams](#), collaborating on research that is not — and should not be — categorized narrowly as either basic research, applied research, or experimental development. Therefore, I am concerned that **Section § 200.202(g)**, requiring such categorization of research awards, shows a fundamental misunderstanding of research and particularly how excellent and innovative research is produced. Mandating such misleading categorization would be a step in the wrong direction for advancing American achievement across all disciplines.

My professional work within healthcare delivery and healthcare research affirms my belief that there could be improvements to how each of these is funded at the federal, state, and local levels. However, my experience also shows that these proposed changes would lead to certain harm, not helpful improvement. As a researcher I am concerned for the future of innovation, understanding, and intellectual and scientific progress. But as a parent, a community member, and a citizen, I am concerned for the ways in which these proposed changes will harm every aspect of our lives — from the healthcare we can receive, to the roads we drive on, to the education my own children and each of our children receive. **Given these clear harms, I ask that the entire proposed rule OMB-2026-0034 be withdrawn.**

I look forward to your response to public comments on the proposed changes and to identifying a way forward in which future federal grantmaking preserves — and enhances rather than undermines — the important contributions the United States government makes to science, medicine, technology, the humanities, the arts, education, and public goods.

Sincerely,

July 10, 2026

<https://scholars.org>

