



Regulation for Federal Financial Assistance

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Dear Mr. Vought,

Thank you for the opportunity to comment on the Office of Management and Budget's proposed revisions to the Uniform Administrative Requirements for Federal Financial Assistance (OMB-2026-0034). My work focuses on data-driven decision-making, using statistics, analytics, demography, epidemiology, and public administration to turn complex data into actionable evidence that improves outcomes in healthcare, education, and communities. Early in my career, managing federally funded nutrition programs in a public school district taught me the importance of evidence-based decision-making, accountability, and consistent federal investment in improving public services. These experiences informed my doctoral research, which examines the impact of data-informed management practices on public-sector outcomes. My work, including a peer-reviewed publication, [Durr, 2024, Journal of Poverty](#), highlights the value of rigorous, independent scientific inquiry in shaping public policy. Although the proposed revisions aim to improve efficiency and accountability, **I oppose the proposed revisions because they would weaken scientific independence, undermine peer review, reduce transparency, increase administrative burdens, and harm U.S. leadership in research and innovation.** These concerns inform my comments on their likely impact. If enacted, these changes would shift decision-making away from scientific experts, making federal research more vulnerable to short-term political interest rather than long-term public benefit. The risks include less innovative research, fewer protections for evidence-driven inquiry, and diminished trust in the integrity of federally funded science. As a result, both the quality of research and its potential to address pressing societal challenges could be significantly compromised.

The Proposed Revisions to Sections 200.205 and 200.340 Would Create Uncertainty, Weaken Scientific Independence, and Discourage Innovative Research

The proposed changes to **§200.205** would make scientific peer review advisory only, allowing political appointees to make final funding decisions. The proposed revisions to **§200.340** would permit agencies to terminate active awards if a project no longer aligns with agency priorities, regardless of scientific progress. Together, these changes would erode the merit-based funding system by diminishing independent scientific judgment. For decades, U.S. global leadership in science has depended on independent peer review—evaluating proposals based on merit, feasibility, innovation, and public benefit. This process has enabled agencies such as the NIH and the NSF to support discoveries that have transformed medicine, engineering, and public health. [Alberts et al. \(2014\)](#) emphasize that the success of the U.S. research enterprise relies on a competitive, merit-based system rather than political preference, producing advances such as genomic sequencing and biotechnology that improved health and economic competitiveness. Peer review

integrity is essential. [Bornmann \(2011\)](#) found it remains the accepted global standard for evaluating scientific quality. Treating expert recommendations as advisory only risks allowing politics, rather than scientific merit, to influence funding decisions. Scientific innovation requires stable funding that enables researchers to pursue ambitious, high-risk ideas. [Azoulay, Graff Zivin, and Manso \(2011\)](#) found that flexible funding and tolerance for uncertainty result in more novel and influential discoveries. Allowing political appointees to override peer review and terminate awards creates uncertainty and discourages innovative, long-term research. Replacing scientific judgment with political discretion also undermines public confidence in federal research. I recommend that OMB retain independent scientific peer review as the primary basis for funding decisions and preserve protections against arbitrary termination of research awards.

The Proposed Changes to Section 200.218 and 200.300 Would Limit the Study of Important Public Health Issues and Undermine Agencies' Ability to Develop Equitable Policies

The proposed changes to **§200.218** and **§200.300** would prohibit federal funding for research using disparate-impact analyses and restrict research on diversity, equity, inclusion (DEI), or so-called “gender ideology.” These provisions would exclude established research methods and limit the study of how social, economic, and environmental conditions affect health. Pressing public health issues such as environmental justice, maternal mortality, and healthcare access require analysis of how risks vary across populations. Disparate-impact analyses are essential for identifying disparities and guiding effective interventions. Restricting these tools would undermine agencies' ability to develop equitable policies and leave policymakers without the evidence needed to make effective public investments. [Braveman \(2025\)](#) argues that routinely applying an equity lens and comparative analyses is crucial for evidence-based policymaking. Eliminating support for these methods would weaken the evidence needed for effective policy evaluation. [Kapadia and Borrell \(2023\)](#) stress that structural racism drives health inequities. Ignoring factors like housing discrimination or environmental exposure limits our ability to explain health differences. These are legitimate scientific topics investigated with established Federal research funding that has historically prioritized methodological rigor and public benefit over the social or political implications of a topic.

The Proposed Revisions to Sections 200.454, 200.461, and 200.432 Would Impose Unnecessary Barriers to Research and Restrict Access to Scientific Knowledge

The proposed revisions would restrict research categories by concept, discouraging important inquiries and limiting the evidence available to policymakers addressing complex challenges. I urge OMB to preserve the use of established scientific methods for studying population health and to continue evaluating proposals through independent peer review, rather than imposing categorical topic restrictions. The proposed changes to **§§200.454, 200.461, and 200.432** would require agency approval for journal subscriptions, publication costs, and conference attendance, adding significant administrative burden for researchers and agency staff. These requirements could delay or block access to literature, publishing opportunities, and conference participation, all of which are fundamental to scientific progress. The [National Academies of Sciences, Engineering, and Medicine \(2018\)](#) and [Tennant et al. \(2016\)](#) found that open access to scientific knowledge is vital for reproducibility, collaboration, and innovation. Restricting these activities would hinder knowledge dissemination, slow research, and limit collaboration.

The Proposed Revisions to Section 200.220 and 200.211 Would Restrict International Collaboration and Constrain Research Innovation

The proposed revision to **§200.220** would prohibit funding for collaborations with designated foreign countries, restricting travel, technical assistance, and partnerships. While protecting sensitive information is important, broad restrictions risk isolating U.S. researchers. Modern science depends on international teams to solve complex problems, and studies such as [Adams \(2013\)](#) and [Wagner \(2008\)](#) show that international collaboration increases research impact and innovation. Overly broad restrictions could harm U.S. competitiveness and slow discovery. The proposed revision to **§200.211** would require all projects to be classified as basic, applied, or experimental. However, scientific discovery rarely fits into neat categories, as modern research is often interdisciplinary. [Stokes \(1997\)](#) and [Bush \(1945\)](#) argue that rigid classifications oversimplify innovation and may constrain research that supports both discovery and practical solutions. Flexibility is needed to support an innovation ecosystem. I recommend that OMB allow flexible, hybrid classifications for research, with periodic review to reflect evolving projects. Flexibility in labeling helps preserve innovation and supports both fundamental and practical advances.

Sincerely,

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