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July 13, 2026

The Honorable Russell Vought
Director
The Office of Management and Budget
725 17th Street, NW
Washington, DC 20503

Re: Docket OMB-2026-0034 Guidance for Federal Financial Assistance

Dear Director Vought,

On behalf of Johns Hopkins University, we submit these comments in response to the Office of Management and Budget's notice of proposed rulemaking to revise the Guidance for Federal Financial Assistance, as published in the Federal Register Document 2026-10817; 91 FR 32198 (May 29, 2026).

Founded in 1876 as the nation's first research university, Johns Hopkins has been dedicated since its inception to advancing and disseminating knowledge for the benefit of humanity. Our longstanding partnership with the federal government reflects a shared commitment to scientific excellence, transparency, and responsible stewardship of taxpayer funds.

Over the past 150 years, Johns Hopkins faculty, students, residents, and alumni, including 29 Nobel Prize winners, have helped bring the benefits of scientific discovery to the world. Many of these achievements, from discovering blood tests for cancer to breakthroughs in reconstructive transplant surgery, resulted directly from research supported by federal grants and contracts—as well as agreements with federal agencies—awarded through the competitive, merit-based peer-review system that has served American taxpayers well for more than 80 years. We are concerned that the proposed revisions could substantially alter the federal-university partnership and compromise the public benefits that flow from federally funded science, creating lasting adverse impacts on the nation and our institution.

We appreciate OMB's stated goals of strengthening transparency, accountability, and oversight to ensure that federal funds maximize public benefit while reducing administrative burden. However, many of the proposed changes would weaken the merit-based, expert-driven system that has made U.S. research the global standard; they would increase administrative burden for both agencies and research organizations, lead to waste or inefficient use of taxpayer resources, and destabilize the nation's innovation ecosystem. While we welcome the opportunity to engage in a constructive dialogue around how the federal government and research partners like Johns Hopkins may best collaborate to accomplish the rule's goals, we are concerned that the specific changes proposed in this rule work against the success of the federal research enterprise and threaten the nation's global competitiveness. In light of this, we strongly urge OMB to reconsider, withdraw, or substantially revise the proposed rule.

While we remain deeply troubled about a broad range of provisions in the proposed rule, the following concepts and specific sections raise significant concerns for Johns Hopkins.

[Sections 200.204, 200.205, 200.206, 200.208] Merit-Based Review is Foundational to Federal Research
America's global leadership in research and innovation rests on a simple principle: Qualified experts should evaluate grant submissions to identify the best ideas through a transparent, scientifically rigorous, merit-based process. The proposed revisions would substantially move away from that approach by directing senior political

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appointees to conduct further review and encouraging them to depart from the peer reviewed recommendations of subject-matter experts. Political appointees would instead review grant proposals based on loosely defined criteria unrelated to the scientific merit of the proposal, such as whether the award would comport with "agency priorities" and the "national interest," allowing subjectivity and political considerations to guide the process. That shift would directly contravene both OMB's stated goal of greater transparency and the principle of unbiased peer review in Executive Order No. 14303, "Restoring Gold Standard Science."

Erosion of peer review weakens science. A transparent expert-driven process ensures that federal investments are directed to the most scientifically rigorous and impactful projects. Section 200.205(b) would require pre-issuance review of each federal award proposal by senior political appointees, overriding the rigorous peer-review process and replacing objective, evidence-based decision-making by a group of experts with ad hoc determinations that are more subjective and less credible.

The federal peer review system has served agencies and the nation well for decades. It supports research at scale across 300,000 scientists and 2,500 organizations, and it helps ensure that scarce taxpayer funds support sound, impactful, high-value work. Relegating rigorous peer review to a diluted advisory role while allowing senior political appointees to reject proposals based on broad and undefined considerations would weaken the integrity and effectiveness of the American research enterprise and will diminish America's position as the leader of global scientific and technological advancement.

Pre-issuance review will cause substantial delays. Requiring senior political appointees to conduct additional reviews of each grant proposal for matters other than scientific merit will slow the award process. Federal science agencies do not have enough political appointees to review every grant proposal.

A significant and unplanned expansion of the political appointee workforce will be required to accomplish the requirements of this approach. For example, NIH has only two senior appointees and manages more than $35 billion in extramural spending each year. In FY25, NIH processed more than 62,000 competitive research project grant (RPG) applications, resulting in nearly 8,200 awards. The practical limits of adding another layer of review and approval were illustrated in FY25 when the volume of applications increased by nearly 13% and awards were down by more than 20% relative to FY24. We have now entered the fourth quarter of FY26 with continued concerns about the pace of federal grantmaking at NIH and NSF in particular. Additional layers of regulatory review and approval would further slow the process, which in turn needlessly slows the pace of scientific and medical breakthroughs.

Applicant risk assessment criteria are vague and burdensome. We support the stated goal of empowering agencies to mitigate risks and protect the integrity of federal programs; however, the applicant risk assessment criteria in Section 200.206 are inadequately defined and would invite inconsistent application. Terms such as "history of questionable practices" and affiliation with organizations that "undermine public safety or national security" are broad and undefined. Because the criteria rely on publicly available information, they also raise concerns about subjective application and inconsistent treatment.

Further, Section 200.208 would allow agencies to add or remove award conditions at any time based on subjective factors during the life of the award with only 15 days' notice, even when there are no concerns about research integrity or compliance with award terms. That timeline is not realistic for institutions that must assess legal obligations, operational impact, compliance capacity, and administrative burden before accepting new terms, and will surely add significant cost given uncertainty and need to assess risk against unclear and subjective criteria. For example, for certain types of clinical trials, premature stoppage or temporary interruption on short notice puts the health of patients under active treatment at significant risk, and compromises an unseen number of other patients who are moving through their care. This approach also raises serious ethical and scientific challenges by potentially compromising results from the clinical trial, resulting in wasted money, time, and erosion of trust.

[200.340 - 200.343] Expanded Termination Authorities Introduce Instability and Waste

Stable and predictable funding is essential to producing high-quality scientific outcomes. The proposed changes to Sections 200.340 through 200.343 would expand agency authority to suspend or terminate meritorious awards without clear scientific or programmatic justification, even when recipients are performing duties in accordance with the terms and conditions of the award and the approved scope of work. Moreover, the proposed rule would also explicitly allow OMB and the agencies to terminate entire classes of awards without warning, whipsawing the American research system and undermining the ability of scientists to complete taxpayer-funded work already substantially underway.

We agree that it is the prerogative of the Administration, together with Congress, to shape the nation's research agenda; however, federal agencies historically signal research priorities through the issuance of new funding opportunities—not the unexpected termination of ongoing research projects. New Notices of Funding Opportunities allow applicants to design proposals reflective of federal priorities, and the peer review process ensures that the submissions are first and foremost based on sound science. Those funding opportunities allow projects aligning with the Administration's priorities to be rigorously assessed by the scientific community and create clear and predictable funding decisions that enable research organizations and scientists to plan projects, recruit personnel, and carry out research effectively.

The threat of unpredictable suspensions or terminations will have a significant chilling effect on science. Researchers and research institutions must plan multi-year projects well in advance, including hiring study and administrative staff, establishing study sites, identifying and recruiting participants, purchasing equipment, securing regulatory and compliance approvals for protocols, and obtaining study reagents and other critical supplies. Research universities as well as corporate and non-profit partners co-invest significant institutional and philanthropic resources to support research because federally funded projects do not cover all research expenses. Broad termination authority of ongoing, previously awarded research projects would discourage institutions like ours and other organizations from undertaking and co-investing in research—particularly large, long-term projects like clinical trials that require substantial upfront investment. Without the stability and incentives provided by reliable federal research funding, the nation ultimately loses many long-established levers enabling responsiveness and innovation.

One example of hundreds of ongoing long-term studies at Johns Hopkins is an NIH-funded longitudinal study of 349 middle-aged and cognitively normal individuals, two-thirds of whom have a family history of Alzheimer's disease. Without continued stable funding, years of essential data and work could be lost and perhaps never replicated, resulting in significant waste of taxpayer funds and impacting study participants and the countless future patients who could benefit from potential treatments.

The negative effects also would extend beyond institutions to research trainees and study participants. The early career researchers (e.g., Ph.D. students and postdoctoral fellows) who rely on stable support to complete their scientific training will be forced to delay or abandon their degrees, they will opt to enter other fields, or they will seek opportunities abroad for careers in research. Study participants—including patients and their families—will face interruptions obtaining the treatment, intervention, or follow-up care they need, potentially compromising the health outcomes for millions of clinical trial patients and other participants at any given time. In addition, for even greater numbers of future patients, the result could be fewer studies, slower development of diagnostics and therapies, and stalled innovation.

Conclusion
In addition to the issues raised above, the rule poses other significant challenges to American research leadership, from prohibitive restrictions on publicly sharing data and findings, to unnecessary restrictions on essential international collaborations, to arbitrarily prioritizing factors wholly unrelated to scientific merit or the ability to perform the work. We have focused our comments on merit review because it is foundational to all of these issues, but we encourage your fulsome consideration of the letters from several organizations of which we are a part—including the Association of American Universities, the Association of American Medical Colleges, and the Council on Government Relations—which address many other important concerns in the proposed rule.

Taken together, the rule's proposed changes would substantially weaken the American innovation ecosystem by eroding the current competitive and scientifically rigorous government-university research partnership, reducing transparency, increasing administrative burden, and fundamentally undermining merit-driven policies governing federal grant administration, to the detriment of federal research and institutions nationwide. We strongly urge OMB to reconsider, withdraw, or substantially revise the proposed rule due to the serious concerns raised by its central provisions.

Sincerely,

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Interim Provost

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