

July 13, 2026

Andrew Reisig and Joel Savary
Office of Federal Financial Management
Office of Management and Budget
Submitted electronically via www.regulations.gov

**Re: Comments of the Natural Science Collections Alliance on the Proposed Rule,
Regulation for Federal Financial Assistance (Docket OMB-2026-0034), 91 Fed. Reg. 32198
(May 29, 2026)**

Dear Mr. Reisig and Mr. Savary:

The Natural Science Collections Alliance (NSC Alliance) submits these comments on the Office of Management and Budget's (OMB) proposed revisions to 2 CFR Part 200, the Uniform Guidance governing federal financial assistance. NSC Alliance represents an international community of natural history museums, botanical gardens, herbaria, universities, and other institutions that house, care for, and conduct research on natural science collections. These collections—billions of specimens documenting life on Earth across centuries—are a foundational national research infrastructure, and the institutions that steward them depend on federal grant funding from the National Science Foundation (NSF), the Institute of Museum and Library Services (IMLS), the National Institutes of Health (NIH), and other agencies governed by this rule.

NSC Alliance shares OMB's stated commitment to transparency, accountability, and responsible stewardship of taxpayer dollars. We are concerned, however, that the proposed rule as written would impose substantial new burdens on collections-holding institutions, disrupt the long-term research and digitization programs that collections make possible, and contradict the administration's own Executive Order on Restoring Gold Standard Science (EO 14303), which calls for science that is reproducible, transparent, collaborative, and subject to unbiased peer review. Our comments focus on the provisions of greatest consequence to our community; the absence of comment on any other provision should not be read as agreement. Each section is keyed to the relevant provisions of 2 CFR Part 200, noted in brackets as OMB has requested.

Inadequate Comment Period and Absence of Cost Analysis

This rule is among the most sweeping revisions to the Uniform Guidance since its creation, amending dozens of parts of Title 2 across hundreds of sections. A 45-day comment period is insufficient for institutions to assess its operational, financial, and legal implications, particularly for smaller museums and collections that lack dedicated grants-management staff. A comment period of at least 90 days would have been far more consistent with past practice and appropriate for changes of this scale and consequence. We further note that OMB's own Regulatory Impact Analysis concedes it could not quantify the rule's costs or benefits and requests public input to fill that gap. A rule of this magnitude should be supported by a genuine cost-benefit analysis completed before, not after, the proposal is issued, because compliance with the rule will itself cost collections institutions significant time and money.

Politicized Review Displaces Scientific Merit and Destabilizes Long-Term Research

[§ 200.202, § 200.205, § 200.208]

Together, these provisions would tie program design and award decisions to shifting administration priorities rather than scientific merit. § 200.202 would require that program goals be aligned with administration policies and priorities; § 200.205 would insert a pre-issuance review in which senior appointees confirm that applications advance the President's policy priorities and the "national interest"; and § 200.208 would allow agencies to change the governing rules midstream. Collections-based science is inherently long-term and cumulative: specimen digitization, biodiversity surveys, and time-series studies build value over decades and rarely align neatly with any single administration's near-term priorities. Subjecting this work to a political filter applied under undefined standards, with no meaningful appeal, threatens precisely the kind of foundational, slow-to-mature research that collections exist to support—and is squarely at odds with the unbiased peer review that the Gold Standard Science order demands. NSC Alliance urges OMB to preserve the primacy of independent scientific merit review.

Expanded Termination and Suspension Authority Threatens Irreplaceable Work

[§ 200.340]

Section 200.340 would let agencies end active awards whenever an award is judged not to serve "program goals, Federal agency priorities, or the national interest," criteria the rule leaves undefined, allowing agencies to terminate awards without clear, objective standards. For collections institutions, midstream termination causes irreversible harm. A multi-year specimen digitization project halted partway leaves collections partially cataloged and inaccessible, stranding the public investment already made. A long-term biodiversity monitoring program—some spanning decades—cannot simply be paused and resumed; an interrupted time series becomes a permanent gap in the scientific record. Early terminations also have a disproportionate effect on grant-funded positions held by students, trainees, and early-career professionals, threatening workforce development and U.S. competitiveness. Because these determinations would turn on shifting priorities rather than the quality or progress of the work, a productive, well-performing program could be halted simply because agency priorities changed—and for collections-based research, the resulting gaps in specimen records and time series cannot be filled retroactively. NSC Alliance urges OMB to restore the established standard under which awards are terminated early only for cause, and to address changing priorities prospectively through new funding opportunities, with notice and an opportunity to respond.

Restrictions on International Collaboration Undermine Collections Research

[§ 200.220, § 200.202(e)]

Section 200.220 would broadly prohibit federal funds for “covered foreign collaborations,” and § 200.202(e) would require case-by-case justification of any international element of an award. Natural science collections are inherently global. Specimens are loaned and exchanged across borders; type specimens that anchor the naming of species reside in institutions worldwide; and documenting and conserving biodiversity requires fieldwork and partnerships on every continent. Blanket restrictions on international engagement would impede specimen loans, joint expeditions, and the shared databases on which modern collections research depends—again contrary to the collaboration the Gold Standard Science order identifies as a hallmark of good science. Legitimate security concerns about specific entities are already addressed through targeted disclosure, export-control, and research-security mechanisms. NSC Alliance urges OMB to withdraw these provisions in favor of those existing, risk-based tools.

Heightened Oversight and Elimination of Fixed-Amount Subawards Burden Small Institutions

[§ 200.303, § 200.333]

Section 200.303 would heighten compliance and monitoring requirements across the entire award life cycle, and § 200.333 would eliminate fixed-amount subawards, moving all subawards to a cost-reimbursement basis. Large, multi-institutional collections networks—such as collaborative digitization efforts that knit together dozens of museums and university collections—rely heavily on subawards to distribute work. Fixed-amount subawards are a streamlined mechanism that lets smaller partners participate without maintaining elaborate financial-tracking systems. Converting them to cost reimbursement and layering on new oversight obligations would impose detailed invoicing and audit burdens that many small museums, herbaria, and field stations cannot absorb, pushing them out of federally funded collaborations entirely. This narrows participation rather than strengthening accountability and directly contradicts the rule’s stated goal of reducing burden. NSC Alliance urges OMB to retain fixed-amount subawards and to scale oversight to each recipient’s actual, documented risk, reserving the most burdensome requirements for those that warrant them.

New Limits on Public Communication and Civic Activity Conflict with the Museum Mission

[§ 200.421, § 200.450]

Section 200.421 would make nearly all advertising and public-relations costs unallowable, and § 200.450 would prohibit voter-registration activities and vaguely defined “issue advocacy or public messaging.” These provisions strike at the heart of what museums and collections institutions do. For museums and botanical gardens in particular, public education and outreach—exhibitions, programming, and communicating the science that collections make possible—are central to their mission and to the public benefit of federally funded research. Many museums also regard nonpartisan voter registration as an integral part of their civic and educational role. The phrase “issue advocacy or public messaging” is so broad that institutions cannot tell which ordinary educational activities might be swept in, raising serious First

Amendment concerns. In addition, the rule lets agencies change the criteria at will, so institutions cannot reliably plan around it. NSC Alliance urges OMB to withdraw these restrictions and, at a minimum, to define their scope narrowly and expressly protect public science education and nonpartisan civic engagement.

Restrictions on Conferences, Memberships, and Publications Impede Dissemination

[§ 200.432, § 200.454, § 200.461]

Section 200.432 would require express prior agency approval for conference attendance; § 200.454 would largely disallow professional-society memberships, subscriptions, and professional-activity costs; and § 200.461 would make publication costs, including open-access fees, unallowable by default. For the collections community, these activities are how taxonomic and biodiversity research is shared, validated, and made usable. Requiring prior approval under criteria that may change at any time means researchers cannot rely on being able to present or publish their findings. The default prohibition on publication costs also conflicts directly with existing federal open-access policy under the 2022 OSTP public-access memorandum, which requires that federally funded publications be made freely available—an obligation typically met by paying the very open-access fees this rule would disallow. NSC Alliance urges OMB to retain current allowability for these costs and, at a minimum, to confirm that publication costs needed to satisfy federal open-access requirements remain allowable.

Conclusion

NSC Alliance supports genuine efforts to improve transparency, accountability, and stewardship of federal funds. As written, however, the proposed rule would burden the institutions that steward the nation's natural science collections, disrupt the long-term and collaborative research those collections make possible, and contradict the administration's own Gold Standard Science order—all without the cost analysis or adequate public comment period such a consequential rule requires. NSC Alliance urges OMB to abandon the rule in its current form and to approach any future major revisions to federal grantmaking policies with meaningful stakeholder consultation and the analyses that should precede a proposed rule of this scope. We welcome the opportunity to work with OMB toward reforms that strengthen accountability while preserving the scientific and educational value of the nation's natural science collections.

Respectfully submitted,

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