
Re: OMB-2026-0034 – Regulation for Federal Financial Assistance

Submitted to: Office of Management and Budget

Date: July 7, 2026

The Institute of Food Technologists (IFT), a global scientific organization representing food scientists across academia, industry, and government, appreciates the opportunity to comment on OMB's proposed revisions to the regulations governing federal financial assistance. IFT supports transparency, accountability, and responsible stewardship of federal funds. However, the proposed rule would materially change how federal awards are reviewed, managed, monitored, and terminated. If implemented without safeguards, several provisions could weaken merit-based scientific review, constrain research dissemination and convening, increase compliance burden, reduce funding predictability, and undermine the infrastructure that converts federally funded research into trusted public knowledge.

IFT is especially concerned that, if the proposal is enacted, the future of federal research funding would become an ever-shifting landscape of different administrations prioritizing funding of projects most closely aligned with the political priorities of the day rather than those with the strongest scientific merit. This fitful, start-stop approach would end up wasting precious research dollars rather than fostering meaningful scientific innovation. Communication, connection, and collaboration are the lifeblood of modern science, including food science. The technological advances that strengthen food safety, public health, nutrition, sustainability, and U.S. competitiveness depend on high-quality, peer-reviewed research and on the ability of scientists to publish, present, convene, and collaborate across sectors. A final rule should preserve accountability without restricting scientific independence, dissemination pathways, and collaborative infrastructure that make federal research investments valuable to the public.

I. Importance of Federal Research Funding to U.S. Competitiveness

Federal investment in science, especially in applied and translational disciplines such as food science, is essential to economic growth, public health, national security, and the resilience of the food system. Food science research supports safer foods, better nutrition, innovation in processing and packaging, workforce development, and the translation of discoveries into products and practices that benefit consumers.

These investments also occur in a global context. U.S. competitors and partners are expanding science investment, publication output, and research infrastructure. China has

strengthened domestic journals and increased research capacity, while South Korea, India, Singapore, Japan, the European Union, and others continue to invest in research and science-policy infrastructure. If U.S. rules make federally funded publishing, convening, dissemination, or collaboration harder, scientific influence, talent attraction, agenda-setting capacity, and the commercialization of research-based technologies could shift away from the United States.

IFT's 2020 white paper, *Food Research Call to Action on Funding and Priorities*, documented persistent underinvestment in food science and technology research and identified longstanding funding gaps that continue to affect food safety, workforce development, innovation, and U.S. competitiveness. Added administrative friction, uncertainty, or restrictions on research dissemination would compound these gaps at a time when the food system is facing increasingly complex socioeconomic, environmental, and market pressures.

II. Potential Unintended Consequences of the Proposed Rule

OMB's proposed rule is framed as an oversight and accountability update, but several provisions raise significant concerns for the scientific enterprise and for organizations that help translate federal research into public benefit.

A. Risk to Merit-Based Peer Review and Scientific Integrity

IFT is concerned that the proposal's expanded authority for senior political appointees to review and determine awards, together with language clarifying that peer review is advisory, could weaken confidence in independent, evidence-based review. Shifting pre-award review and funding approval from scientific panels of subject-matter experts toward political review risks rewarding alignment with current policy priorities rather than scientific merit.

A strong merit-based peer review system is essential to ensuring that federal research funding decisions are grounded in scientific quality, rigor, feasibility, and public value. While agencies should maintain appropriate oversight and accountability, the final rule should not create uncertainty about whether scientific merit remains the primary basis for research funding decisions.

Recommendation: OMB should preserve rigorous merit-based peer review as the primary basis for determining scientific merit and should maintain transparency around any additional layers of review, including the criteria used and the role of non-scientific reviewers.

B. Constraints on Research Dissemination, Scholarly Publishing, and Convening

IFT is concerned about proposed restrictions or advance approvals for mission-supporting activities such as memberships, publications, journal subscriptions, article processing charges, conferences, meetings, and related dissemination activities. These concerns are particularly acute with respect to proposed changes to 2 CFR 200.454 on memberships, subscriptions, and professional activity costs; 2 CFR 200.461 on publication and printing costs, including article processing charges; and 2 CFR 200.432 on conferences and meetings. These activities are not peripheral to science; they are part of the infrastructure that enables peer review, scientific publishing, technical training, standards development, professional exchange, and workforce development.

Scientific publication and data sharing are integral to transparency, reproducibility, and the practical application of federally funded research. Conferences and professional meetings allow researchers to present findings, receive critique, identify collaborators, and accelerate translation into practice. Because the proposed rule would directly affect the allowability and approval of costs associated with publishing, subscriptions, professional memberships, conferences, and meetings under 2 CFR 200.454, 200.461, and 200.432, OMB should clarify that these costs remain allowable when they are reasonable, allocable, and directly connected to federally supported work. If publication costs, open access fees, journal subscriptions, conference participation, or other dissemination-related expenses become more difficult or unallowable, researchers will face new barriers to sharing findings, societies will lose revenue that sustains editorial quality and community services, and smaller organizations will be less able to participate in federal opportunities.

Scholarly societies exist to disseminate scientific information so it can ultimately be put to use solving problems and creating new technologies. These proposed restrictions could undermine publishing, peer review, open access pathways, collaboration, and the scholarly infrastructure that converts federally funded research into trusted public knowledge. By restricting the ability of food scientists to publish, present, and share research data, federally supported science could become siloed, diminished, and less useful to the public.

Recommendation: OMB should ensure that allowable costs continue to support timely, high-quality scientific communication, including publication, peer review, data sharing, convening, conference participation, professional memberships, subscriptions, and professional activities directly tied to federally funded work. In finalizing 2 CFR 200.454, 200.461, and 200.432, OMB should expressly preserve the allowability of reasonable and allocable costs for memberships and subscriptions, article processing charges and other publishing costs, and conferences or meetings that support dissemination, training, collaboration, standards development, or other award-related objectives. OMB should avoid

restrictions that would unintentionally reduce access to credible dissemination channels or weaken the scholarly infrastructure that federal research depends upon.

C. Restrictions on International Collaboration

IFT recognizes the importance of national security safeguards and appropriate risk management. However, proposed 2 CFR 200.220, addressing covered foreign collaborations, could be interpreted too broadly and inadvertently restrict valuable international scientific partnerships. In food science and many other applied fields, progress depends on collaboration, access to global expertise and data, and participation in international research networks.

Overly broad restrictions could diminish U.S. leadership and reduce the impact of federally supported research. Food safety, nutrition, public health, supply chain resilience, traceability, and standards development all benefit from carefully managed international exchange. A rule intended to protect U.S. interests should not unintentionally isolate U.S. scientists from low-risk collaborations that strengthen U.S. influence and scientific leadership.

Recommendation: OMB should clarify the scope and application of 2 CFR 200.220 and adopt a targeted, risk-based approach that protects national security without broadly limiting low-risk scientific collaboration, participation in international research networks, or engagement in standards and science-policy activities that advance U.S. leadership.

D. Increased Administrative Burden and Operational Uncertainty

IFT is concerned that expanded compliance requirements, broader risk assessments, more approvals, increased oversight of affiliates and subrecipients, and greater discretion to suspend or terminate awards could create significant uncertainty for universities, nonprofits, scientific societies, and other research-performing or research-supporting institutions.

A less predictable funding environment will likely discourage long-term investment, restrain innovation, and create instability for trainees, early-career scientists, staff, vendors, and institutions that rely on federal awards to plan research, publications, conferences, workforce programs, and other public-benefit activities. In particular, uncertainty around 2 CFR 200.454, 200.461, and 200.432 could complicate planning for journal subscriptions, professional society participation, article processing charges, conference registration, meeting logistics, speaker participation, and dissemination activities that are often scheduled months or years in advance. Broader termination authority could also complicate staffing, publication planning, convening, vendor commitments, and long-term program delivery even after awards have been approved and work is underway.

Recommendation: OMB should provide clear and consistent compliance expectations, minimize duplicative approvals, clarify the scope of recipient and subrecipient responsibilities, and limit discretionary termination authority to circumstances tied to clearly defined legal, financial, or performance-based criteria. The final rule should preserve stability and predictability for federally funded research and related mission delivery.

E. Congressional Authority and Federal Research Funding Priorities

IFT is also concerned that the proposal could set a precedent for OMB to use internal administrative procedures to alter or withhold funding for research programs that Congress has authorized or appropriated. Federal research priorities are shaped through statutes, appropriations, agency missions, and public processes. Administrative procedures should not be used to circumvent congressional intent or to defund congressionally approved research programs based on shifting political preferences.

This concern is particularly important for science because federal research investments often require long-term planning and continuity. Research programs, graduate training, laboratory operations, field studies, publication timelines, and public-private partnerships cannot be turned on and off without consequence. If recipients believe previously approved awards can be suspended or terminated for reasons unrelated to scientific quality, legal compliance, or award performance, confidence in federal research programs will be weakened.

Recommendation: OMB should clarify that the final rule will not be used to override congressional intent, alter congressionally approved research priorities through administrative procedures, or terminate ongoing awards except under clearly defined and transparent criteria consistent with law and award performance.

III. Broader Strategic Context: Global Competition in Science

The concerns described above should be considered in the context of increasing global competition in science and technology. Other nations are strengthening domestic research capacity, scholarly publishing systems, and science-policy infrastructure. In this environment, policies that add friction, reduce flexibility, restrict dissemination, or discourage collaboration risk weakening the United States' research position at a time when strategic investment and scientific openness are especially important.

Food science is a clear example of why this matters. Advances in food safety, nutrition, processing, packaging, sustainability, and supply chain resilience depend on research that moves efficiently from discovery to dissemination to adoption. If federal rules make it harder for scientists to attend conferences, publish in reputable journals, participate

in peer review, maintain professional memberships, collaborate across borders, or sustain research-supporting infrastructure, the United States risks losing convening power and global scientific leadership.

IV. Recommendations

IFT supports OMB's goal of improving accountability and stewardship of federal funds. At the same time, the final rule should preserve the core elements of a strong U.S. research ecosystem and avoid unintended consequences that would weaken science, innovation, and public benefit.

- Preserve merit-based peer review as the primary basis for determining scientific merit in research funding decisions.
- Maintain transparency around any additional review layers, including criteria used by senior officials or political appointees.
- Ensure that allowable costs continue to support publication, peer review, open access pathways, data sharing, conferences, professional memberships, subscriptions, standards development, and other mission-supporting activities tied to federally funded work, including through clear final-rule language in 2 CFR 200.454, 200.461, and 200.432.
- Avoid restrictions that would undermine scholarly publishing, scientific convening, dissemination, and workforce development.
- Use a targeted, risk-based approach to foreign collaboration that protects national security without broadly limiting low-risk international scientific exchange.
- Clarify compliance expectations and reduce duplicative approvals, reporting, and oversight requirements that divert resources from research and mission delivery.
- Limit suspension or termination authority to clearly defined legal, financial, or performance-based criteria and preserve stability for approved, ongoing research.
- Clarify and affirm that OMB will not use internal administrative procedures to override congressional intent or defund congressionally approved research programs.
- Consider the global competitiveness implications of any final rule, including whether restrictions on dissemination, publishing, collaboration, and convening could shift scientific influence and innovation capacity away from the United States.

V. Conclusion

IFT supports accountability, transparency, and responsible oversight in federal grantmaking. However, accountability should strengthen, not constrain, the nation's scientific enterprise. The proposed rule could reshape federal grantmaking in ways that constrain core activities of scientific research, increase compliance costs and uncertainty, weaken the long-

term value of federal investments, and undermine the infrastructure that turns federally funded research into trusted public knowledge.

IFT urges OMB to revise the proposed rule to preserve scientific independence, protect merit-based review, support dissemination and scholarly publishing, maintain workable collaboration pathways, respect congressional intent, and provide stable and predictable conditions for federally funded research. In particular, OMB should ensure that final provisions governing memberships and subscriptions under 2 CFR 200.454, publishing costs under 2 CFR 200.461, and conferences and meetings under 2 CFR 200.432 do not inadvertently restrict reasonable and necessary activities that make federally funded science visible, credible, collaborative, and useful to the public. A final rule that balances accountability with scientific integrity will better serve the public, strengthen food science and related applied disciplines, and help sustain U.S. leadership in a highly competitive global research environment.

In conclusion, IFT thanks the Office of Management and Budget for considering these comments. Please contact Brendan Niemira, PhD, Chief Science and Technology Officer, Institute of Food Technologists, if IFT may be of further assistance.

Brendan Niemira, PhD
Chief Science and Technology Officer
Institute of Food Technologists

Resources:

Food Research: Call to Action on Funding and Priorities

<https://www.ift.org/siteassets/1-page-sections-media-blocks/4-policy-and-advocacy/docs/information-and-resources/food-research-call-to-action-on-funding-and-priorities.pdf>

OMB's Proposed Funding Rules Will Undermine Scientific Research in the U.S. [ift-comments-omb-proposed-funding-rules-niemira.docx](#)
