



**Society for
Epidemiologic
Research**

July 9, 2026

Office of Management and Budget
725 17th Street NW
Washington, DC 20503

Re: Comment on Docket OMB-2026-0034, Proposed Rule "Regulation for Federal Financial Assistance"

Submitted online via <https://www.regulations.gov/commenton/OMB-2026-0034-0001>

The Society for Epidemiologic Research (SER) opposes the Office of Management and Budget's (OMB) proposed rule, OMB-2026-0034, Office of Management and Budget, Regulation for Federal Financial Assistance published on May 29, 2026, because of the harm it would cause epidemiologic research and the broader public health enterprise.

SER is a nonprofit scientific organization dedicated to advancing epidemiologic science. Founded in 1968, SER's mission is to strengthen the methods, people, and institutions that generate reliable evidence about health and disease, and to foster the development of future generations of epidemiologists. Our membership includes researchers, trainees, and public health practitioners committed to generating rigorous evidence to improve human health. Through annual meetings, scientific exchange, and support for high-quality research, we strengthen the foundation for sound health policy and practice.

Society for Epidemiologic Research

PO Box 1831

Eagle, Idaho 83616

t: 385.393.7077

www.epiresearch.org

Epidemiology provides the evidence needed to understand disease, identify high-risk populations, evaluate interventions, and prevent illness and death. This work depends on core scientific principles: objectivity, transparency, self-criticism, and open sharing of methods and results so findings can be reviewed, challenged, replicated, and strengthened. These conditions are essential to producing trustworthy and useful research.

The proposed OMB rule undermines these foundations in several ways. It would politicize merit review, expand agency discretion to terminate research awards, restrict international collaboration, and limit dissemination of research. Together, these changes weaken the nation's ability to generate reliable evidence, sustain long-term research and surveillance systems, and train future public health leaders. At a time when high-quality evidence is urgently needed, these provisions risk reducing the credibility and usefulness of epidemiologic research.

The consequences extend beyond the research community. Epidemiologic evidence underpins policies and practices that address emerging threats. With increasing spread of infectious diseases and environmental exposures, and rising rates of chronic diseases in some populations, the nation cannot afford to weaken its capacity to protect public health.

Public health emergencies require rapid decision-making, but the ability to generate reliable evidence must be built and sustained over time. The nation's research infrastructure is a long-term investment that cannot be quickly restored once weakened.

We urge OMB to reconsider provisions that may impair the nation's capacity to produce reliable scientific evidence and to carefully assess their long-term consequences for public health research and preparedness. Strong public health depends on strong science, and strong science depends on policies that uphold the principles of scientific inquiry. In addition to concerns about the rule overall, we highlight the following sections:

Society for Epidemiologic Research

PO Box 1831

Eagle, Idaho 83616

t: 385.393.7077

www.epiresearch.org

[200.205] — Merit review and pre-issuance review

SER supports transparency, accountability, research security, and responsible stewardship of federal funds. To preserve rigorous and credible scientific awards, OMB should clarify that pre-issuance review is conducted using objective, consistently applied criteria and does not duplicate or weaken established expert review of scientific and technical merit.

For epidemiologic research, merit review must assess study design, methods, data quality, feasibility, innovation, ethical protections, and public health significance, conducted by reviewers with appropriate subject-matter expertise. Administrative review should focus on eligibility, budget allowability, conflicts of interest, research security, human-subject protections, and other compliance requirements, while preserving expert review as the primary mechanism for evaluating scientific merit.

[\$200.340] — Termination and suspension

SER urges OMB to recognize the long-time horizons and sustained investment required for epidemiologic research, surveillance systems, longitudinal studies, and training programs. These efforts depend on continuity to maintain data systems, follow study populations, support trainees, and produce reliable evidence.

Termination or suspension of awards should be based on clear, objective, and reviewable criteria, with appropriate notice and opportunity to respond. This approach preserves oversight while reducing uncertainty for institutions, investigators, trainees, and research participants.

[\$200.218 and §200.300] — Clarification for epidemiologic and public health research

SER recommends that OMB clarify that the rule does not restrict lawful, scientifically valid research, surveillance, statistical analysis, program evaluation, or dissemination related to differences in exposures, disease burden, access to care, treatment, outcomes, environmental risks, or intervention effects across populations.

Society for Epidemiologic Research

PO Box 1831

Eagle, Idaho 83616

t: 385.393.7077

www.epiresearch.org

Epidemiologic research routinely examines variation by age, geography, socioeconomic status, race, ethnicity, sex, disability, and other relevant factors. These analyses are essential for understanding disease patterns, evaluating interventions, and improving population health. OMB should include clear language preserving epidemiologic and biostatistical research that measures and reports population differences for scientific and public health purposes.

[\$200.220] — Prohibition on international collaboration with covered foreign countries

The proposed rule would prohibit the use of federal funds for collaborations with covered foreign entities, including research, technical assistance, travel, and related indirect costs, except with specific authorization. As an organization with global impact, SER relies on and fosters international collaboration among its members.

The provision, as written, would restrict routine, low-risk scientific activities such as co-authorship, data sharing with appropriate protections, and joint fieldwork, not only activities that pose genuine security risks. Broad interpretation could deter international collaboration due to unclear and discretionary approval processes.

SER recommends narrowing §200.220 to focus on documented national security risks:

- Establish a clear and timely approval process.
- Exempt routine academic activities, including co-authorship, data sharing, conference participation, and established multinational collaborations.
- Clarify that indirect costs are allowable for research with international components.
- Align with existing federal frameworks rather than superseding them.

[\$200.432] — Conference attendance requirements

SER strongly opposes requiring prior agency approval for conference attendance. This requirement would add administrative burden, delay participation, and limit dissemination of federally funded research. Scientific conferences are essential for

Society for Epidemiologic Research

PO Box 1831

Eagle, Idaho 83616

t: 385.393.7077

www.epiresearch.org

presenting findings, receiving critical feedback, building collaborations, and maintaining professional competence. Mandatory pre-approval would not improve stewardship of federal funds but would instead delay time-sensitive participation, increase compliance costs, and restrict scientific exchange.

The burden would fall disproportionately on trainees, early-career investigators, and those at smaller institutions, creating inequities in access and participation. This change would reduce opportunities to present research, form collaborations, and stay current in rapidly evolving fields.

SER also requests that OMB provide estimates of the administrative costs and projected savings associated with implementing this requirement, including the basis for those estimates.

[\$200.454] — Journal subscription costs

SER strongly opposes limiting or disallowing journal subscription costs. Access to scientific literature is essential for conducting research, evaluating findings, mentoring trainees, and avoiding duplication.

Restricting these costs would disproportionately affect smaller institutions, early-career investigators, and those without access to well-resourced libraries, widening inequities and reducing research competitiveness. It would also hinder collaboration and knowledge dissemination, particularly in interdisciplinary fields. OMB should preserve journal subscription costs as allowable when necessary for the performance of federally funded research.

[\$200.461] — Publication and open-access costs

SER urges OMB to maintain publication and open-access costs as allowable when directly tied to the dissemination of federally funded research. These costs are integral to ensuring that findings are accessible, citable, and usable by researchers, clinicians, and policymakers.

Society for Epidemiologic Research

PO Box 1831

Eagle, Idaho 83616

t: 385.393.7077

www.epiresearch.org

Restricting these costs would disproportionately affect investigators with limited resources and slow the dissemination of scientific knowledge. It would also create inequities in publishing and reduce the return on federal research investments.

Open-access fees support compliance with federal policies, including the NIH Public Access Policy, which requires public availability of NIH-funded research. Many journals charge publication fees, and similar requirements exist across federal agencies. OMB should ensure that publication and open-access costs remain allowable and avoid creating barriers that limit timely dissemination of research.

In summary, the proposed rule would disproportionately affect students, early-career researchers, and investigators at public institutions, those critical to the future of population health science. Policies that politicize merit review, increase uncertainty in funding, restrict research scope, and limit dissemination risk shifting federal science away from scientific need and toward administrative or political control, undermining the stated goals of grants management reform.

SER is willing to provide additional information or clarification on these comments if needed. For questions, please contact Suzanne Bevan, SER Executive Director, at sbevan@epiresearch.org. On behalf of SER and our 2,500 members and the Executive Committee, we urge OMB to withdraw this proposed rule.

Sincerely,

Wendy Nembhard, PhD, 2026 President

Yvette Cozier, ScD, Past-President

Brian Whitcomb, PhD, 2026 President-Elect

Suzanne Bevan, Executive Director

Society for Epidemiologic Research

PO Box 1831

Eagle, Idaho 83616

t: 385.393.7077

www.epiresearch.org