

July 10, 2026

Andrew Reisig and Joel Savary
Office of Federal Financial Management
Office of Management and Budget
725 17th Street, NW
Washington, DC 20503

Submitted electronically via www.regulations.gov

Re: Comments on Proposed Rule “Regulation for Federal Financial Assistance,” OMB-2026-0034, 91 Fed. Reg. 32,198 (May 29, 2026)

Dear Mr. Reisig and Mr. Savary:

The American Society of Agronomy (ASA), the Crop Science Society of America (CSSA), and the Soil Science Society of America (SSSA) (collectively: ASA, CSSA, SSSA) respectfully submit the following comments in response to the Office of Management and Budget’s (OMB) proposed revisions to 2 CFR Subtitle A, published at 91 Fed. Reg. 32,198 (May 29, 2026) (the “Proposed Rule”).

ASA, CSSA, and SSSA represent more than 20,000 scientists, researchers, educators, and practitioners working in academia, federal research agencies, private industry, and directly with farmers and landowners. We are the largest coalition of professionals dedicated to the agronomy, crop and soil science disciplines in the United States. Our member scientists work at the cutting edge of research dedicated to increasing agricultural productivity while managing natural resources and our certificants offer sound, trusted advice to producers for profitable and sustainable farms.

While the Societies share OMB’s stated objectives of improving transparency, accountability, and stewardship of federal financial assistance, several provisions of the Proposed Rule would, as drafted, introduce significant new risks and burdens for the research enterprise without a clear connection to those objectives. ASA, CSSA, and SSSA oppose the Proposed Rule as written and urge OMB to reconsider entirely or substantially revise the provisions discussed below.

I. Pre-Issuance Review and the Role of Scientific Peer Review in Discretionary Awards (§ 200.205(b))

ASA, CSSA, and SSSA, along with most of the scientific enterprise, view peer review as a foundational, community-driven process that ensures the integrity and quality of scientific research. Scientific peer review has long been the cornerstone of competitive federal research funding because it ensures awards reflect scientific merit and technical rigor best judged by subject-matter experts. Proposed § 200.205(b) would require senior political appointees to

conduct pre-issuance review of all discretionary awards, independent of and not bound by scientific peer review, which the Proposed Rule specifies remains merely “advisory.”

ASA, CSSA, and SSSA are deeply concerned about the implications of this provision for federal competitive research programs. Introducing an additional, non-deferential layer of political review over every discretionary award risks substituting non-expert judgment for the technical evaluation that has historically been the primary determining factor in funding decisions for competitive research. In addition to the merit concerns, the Societies are concerned about the practical effect this provision will have on award timing. An additional, open-ended layer of political pre-issuance review introduces timing uncertainty that could cause researchers to miss planting windows, lose access to field sites, or be unable to retain trained technical staff between award cycles. We are also concerned with the increased personnel needs and additional costs to implement this additional layer of oversight.

We recommend that OMB rescind the requirement for pre-issuance review by senior political appointees of scientific awards and instead continue to rely on the scientific and technical expertise of peer review as the primary funding evaluation process. We recommend that OMB clarify that any pre-issuance review is only intended to address legal compliance and statutory program alignment rather than to second-guess peer review merit determinations. We also suggest that OMB establish defined timelines for any such review so it does not introduce open-ended delay into award cycles bound by agricultural production seasons.

II. Expanded Discretionary Termination and Suspension Authority (§§ 200.340–200.343)

ASA, CSSA, and SSSA have significant concerns regarding proposed § 200.340, which would expand agencies’ authority to terminate a federal award, in whole or in part, whenever the agency determines termination is “in the interest of the Federal agency,” including where the award no longer effectuates “the national interest” as it exists “at the time of the termination,” as well as the new 90-day discretionary suspension authority at § 200.340(e), and the limited procedural protections afforded to recipients under §§ 200.341–200.343 for discretionary (as opposed to noncompliance-based) terminations.

These changes would have significant deleterious impacts on the scientific enterprise which relies on the sustained, long-term commitment of federal investments in research. Sustained, consistent research funding, often through multi-year grants or contracts is essential because scientific progress is cumulative. Breakthroughs typically build on years of foundational work, stable teams, and consistent data collection. The proposed changes would limit research continuity, leading to loss of skilled personnel and institutional knowledge, delayed results, and ultimately reduce the return on public investment by forcing scientists to spend time rebuilding capacity rather than advancing knowledge.

Agricultural research projects in particular are frequently structured around multi-year field trials, long-term monitoring sites, and breeding programs involving substantial up-front investment, such as establishing field plots, hiring and training technicians, and planting perennial crops that cannot be recovered if a project is terminated mid-stream. A standard tying continued funding to a subjective, time-variable “national interest” assessment, with minimal notice and no appeal, is fundamentally incompatible with the multi-year time horizons on which agricultural science depends, and a poorly timed 90-day suspension alone could destroy an entire season’s data.

We oppose the expanded discretionary termination authority that is outlined in the Proposed Rule as written. We recommend that OMB limit discretionary “national interest” terminations to documented changes in statutory authority, appropriations, or program priorities. If an early

termination is required, we urge agencies to provide reasonable wind-down funding for multi-year research awards sufficient to preserve field sites, long-term datasets, and biological materials and require that any suspension authority account for seasonal and/or biological timing constraints. Finally, agencies should be required to develop an appeals process in the event of an early termination.

III. Impacts of Proposed §§ 200.218, 200.300, and 200.206(b) on Legitimate Agricultural and Demographic Research

ASA, CSSA, and SSSA have long supported policies and programs that broaden the available workforce in agronomy, crop science, and soil science, recognizing that a scientific workforce drawing on the widest possible range of backgrounds and experience strengthens the discipline and better serves the full diversity of American producers and citizens. ASA, CSSA, and SSSA are concerned that the proposed changes to § 200.218 (prohibiting use of awards to support disparate-impact theories), the general standards for award management at § 200.300, and the expanded risk factors at § 200.206(b) and could discourage legitimate research and limit longstanding efforts to broaden the workforce the agricultural research enterprise.

We are concerned that § 200.300's general directive that awards be managed and administered in a manner consistent with § 200.218 could be read to reach activities such as mentoring, recruitment, and training programs aimed at increasing participation by non-traditional groups in agricultural research. Additionally, we are concerned that an overly broad interpretation of § 200.218 could limit the ability of researchers to examine disparities in access to USDA conservation programs, crop insurance, and credit among socially disadvantaged, limited-resourced, and beginning farmers – research that is actually required or encouraged by Farm Bill provisions. We are similarly concerned that § 200.206(b)'s focus on “questionable practices” (vii) or affiliations (viii) are overly broad and could disadvantage universities or institutions based on activities entirely unrelated to a specific award.

We recommend that OMB confirm that the research exception in § 200.218 (d) extends to federally funded research whose focus of study is demographic disparity and that §§ 200.218 and 200.300 do not reach efforts to broaden participation in the research workforce and enterprise. We further recommend that the risk factors under § 200.206(b) be limited to matters directly relevant to the specific applicant and project rather than institution-wide characteristics.

IV. Foreign Collaboration Restrictions and the Domestic-First Framework (§§ 200.202(e) and 200.220)

Agronomic, crop science, and soil science research is inherently international: plant genetic resources, soil classification, pest and pathogen surveillance, and climate-resilient crop management research all depend on collaboration that crosses borders, often with non-adversarial public institutions, such as international agricultural research centers and national agricultural research systems in allied countries. We are concerned that the breadth of proposed § 200.220 which would apply “regardless of whether Federal funds are used for direct programmatic activities, research, technical assistance, travel, or indirect costs allocable to such collaborations” and the case-by-case justification requirements of § 200.202(e)'s domestic-first framework could sweep in scientifically essential collaborations, such as international germplasm exchange and variety trial networks, alongside the relationships the rule is genuinely intended to address, while imposing significant new compliance burdens on researchers and grants offices.

We recommend that OMB provide a categorical exception or expedited pathway for collaborations involving international agricultural research centers, international variety testing networks, and germplasm exchange under existing international agreements. We oppose blanket restrictions on international research collaborations and recommend that OMB clarify that § 200.220 is intended to reach collaborations presenting an identifiable security, economic, or integrity risk rather than all collaboration with any entity connected to a covered country regardless of risk.

V. Cost Allowability Changes Affecting Scientific Communication and Professional Development (§§ 200.432, 200.454, and 200.461)

As scientific societies whose core mission is supporting the professional development of agricultural researchers through publication, presentation, collaboration, and mentorship, we are well positioned to comment on proposed changes in allowable costs. The proposed changes in allowable costs would significantly limit scientific societies from providing these invaluable services that support the research enterprise. Specifically, we oppose the non-allowability for publication costs (§ 200.461), the new requirement that conference attendance be expressly approved by the agency and written into award terms (§ 200.432), and the questionable allowability of membership and professional activity costs under § 200.454.

Peer-reviewed publication is the mechanism by which federally funded research is validated, disseminated, and made usable by other researchers, extension educators, and producers. Treating it as presumptively unallowable risks suppressing publication or shifting costs onto institutions and disproportionately impacts early-career researchers. Likewise, attendance at scientific society meetings is where federally funded researchers present results, receive peer feedback, generate new ideas and collaborations that result in stronger federal grant applications, and coordinate multistate projects. Requiring agency pre-approval for each instance of attendance, written into award terms in advance, would impose significant new administrative burden on recipients and agency staff alike.

We recommend that OMB retain the existing allowability standard for publication costs directly tied to dissemination of project results rather than a presumption of unallowability. For conference attendance, retain the existing reasonableness and necessity standard or permit blanket pre-approval of attendance at a recipient's primary disciplinary society meetings without award-by-award approval. We also ask that OMB confirm that society membership dues and professional activity costs under § 200.454 remain allowable on the same basis as under current guidance.

The Societies appreciate the opportunity to comment on the Proposed Rule and would welcome the opportunity to discuss these comments further with OMB staff. Thank you for your consideration.

Respectfully submitted,

American Society of Agronomy
Crop Science Society of America
Soil Science Society of America