

July 13, 2026

Submitted electronically via www.regulations.gov

The Honorable Russell T. Vought
Director, Office of Management and Budget
Executive Office of the President
725 17th Street NW
Washington, DC 20503

Re: Comments on the Proposed Rule, Regulation for Federal Financial Assistance

Docket No. OMB-2026-0034; RIN 0348-AB81 (lead)

91 Fed. Reg. 32198 (proposed May 29, 2026); Comment Deadline: July 13, 2026

Proposed Effective Date: October 1, 2026

Dear Director Vought:

The American Association for Anatomy (AAA) is a scientific professional association founded in Washington, D.C. in 1888 that today represents more than 2,000 students, educators, and researchers of the anatomical sciences across the United States and worldwide. We provide our members with opportunities for professional development, scientific collaboration, tools for job seekers in the field around the country, and we hold annual meetings with over 800 attendees contributing to local economies in cities around the U.S. We also publish three highly-regarded peer-reviewed scientific journals: *Anatomical Sciences Education*, *Developmental Dynamics*, and *The Anatomical Record*. Our members are anatomical scientists whose work in education and research is essential to advancing the understanding of human and animal anatomy. Their research and expertise directly inform medical education, clinical practice, biomedical research, and the development of new treatments for chronic and life-threatening diseases.

We write with serious concern regarding the Office of Management and Budget (OMB's) proposed rule revising 2 C.F.R. Part 200 (Docket OMB-2026-0034), open for public

comment through July 13, 2026. We raise significant concerns about the following provisions:

- § 200.205 — Political pre-issuance review
- § 200.340 — Discretionary termination authority
- § 200.202(e), § 200.220 — International collaboration restrictions
- § 200.300 & § 200.218 — DEI and disparate-impact restrictions
- § 200.205 & § 200.300 — Training grants (T32, F31, F99)
- § 200.300 — “Gender ideology” prohibition
- § 200.405 & § 200.432 — Publication costs, conference travel and society membership dues costs unallowable by default

For the reasons detailed below, we urge OMB to withdraw this proposed rule in its entirety.

The element of the proposed rule that is of greatest concern to our members and us is the dramatic conversion of long-standing government-wide guidance into enforceable regulation. This will have a substantial impact on the compliance burden on institutions relying on federal research funding that have real and substantive benefits to all Americans.

Institutions with fewer administrative resources, like small colleges, rural research centers, and minority-serving institutions will be acutely affected and can make continued participation in federal grant programs no longer feasible.

Valuable research depends on the ability to ask new questions and test uncertain ideas. Significant additional constraints on the funding of scientific research risks narrowing the scope of inquiry and slowing the advancements that these funding programs are intended to help steward.

[§ 200.205 — Political pre-issuance review]

Federal research funding has helped create incalculable benefits by relying on the expertise of scientists to determine which research efforts should receive support. By making the peer review process merely advisory, the proposed political pre-issuance review (§ 200.205) would replace scientific merit with partisan and transient political judgments, which would inevitably benefit no one by hampering important scientific and medical developments. AAA members’ research is mainly supported by NIH, NSF, and

USDA and has relied on that merit-based understanding for support. Long-standing programs in bone regeneration, lung development, cleft lip and palate, and understanding dinosaur and fossil records have led to new treatments for fractures, birth defects, premature infants, and a better understanding of the lives of our ancestors.

[§ 200.340 — Discretionary termination authority]

The proposed rule (§ 200.340) would further shift the awarding of federal research grants from merit-based scientific priorities to temporary and ever-changing political priorities by allowing for the termination of research grants purely based on the latter. Scientific institutions rely on long-term planning and investment to conduct research, including hiring decisions, facilities and infrastructure investments, equipment purchases, and other careful planning. This necessary planning would be rendered impossible if years-long research is cancelled following a change in the executive administration or even in month-to-month political priorities. For example, the development and optimization of artificial skin for burn patients took years of continuous research and would not be a clinical option for patients if not for the long-term investment in the field of wound healing.

[§ 200.202(e), § 200.220 — International collaboration restrictions]

In recognition of the importance of international collaboration to the best outcomes in scientific research, AAA is open to international membership, and we currently have members in 56 countries. Hundreds of these members visit the United States each year to attend our annual meeting and to collaborate with their international peers. Our members' research depends on this international collaboration that will be directly affected by the proposed restrictions in the rule (§ 200.202(e), § 200.220). Presumptively disfavoring research that involves international collaboration would result in increased administrative burden and worse outcomes not just for researchers but for the average Americans who stand to benefit greatly from our vital research.

[§ 200.300 & § 200.218 — DEI and disparate-impact restrictions]

Valid scientific research, particularly in human anatomy, depends on the inclusion of an appropriately demographically diverse human population. Furthermore, a research workforce that reflects that diversity is more likely to ask the right questions ensuring these studies are designed and evaluated with the appropriate attention to these concerns. As a result, the restrictions placed on consideration of diversity in scientific research by (§

200.300 and § 200.218) risk harming the scientific validity of important biomedical research. NIH's own scientific priorities have long recognized this need. This is particularly relevant in the field of educational research, which aims at addressing the global need of a highly diverse student population.

[§ 200.205 & § 200.300 — Training grants (T32, F31, F99)]

The proposed DEI restrictions (§ 200.300) and political pre-issuance review requirements (§ 200.205) further impact the ability of training grant programs to function. These important programs provide participants with invaluable mentor relationships, laboratory experience, conference participation, and important professional development. The uncertainty that will impact these programs due to these additional compliance burdens will hamper their ability to operate at all, especially if funding can be cancelled at any time on a whim. Many of our members mentor graduate students who are supported by these training grants. It is with these funds that our students travel to Anatomy conferences to present their work, network with colleagues, and get their research done.

[§ 200.300 — “Gender ideology” prohibition]

The provision prohibiting “gender ideology” in research (§ 200.300) relies on vague, political definitions rather than scientific ones and will dilute important anatomical research as a result. Analyzing sex and gender differences are crucial to understanding diseases, their treatments, and ultimate health outcomes. Regulations and requirements around these areas should remain purely science-based regarding this vital research.

[§ 200.432 & § 200.454 — Conference travel and society membership dues costs unallowable by default]

The rule provisions (§ 200.432 and § 200.454) prohibiting the use of federal funding to support attendance at scientific conferences and membership dues for societal associations reflect a profound misunderstanding of the research process and the needs of the scientific community. Research not only takes place in a lab; it is a collaborative process that involves presentations of findings, discussions, and feedback with peers in one's field to truly reach the best and most beneficial conclusions. These restrictions will limit access to that important stage of the research process to a subset of those who have been able to do so in the past thanks to federal funding support. As with other provisions of the proposed rule, this will dramatically reduce the positive results of research that AAA's

members are able to produce. It will also negatively impact our nonprofit organization and our ability to support our members' professional growth by limiting participation, discouraging engagement, and reducing the diversity of our most engaged members participating in these collaborative programs.

[§ 200.461 — Restrictions on research publishing]

Similarly, the research process is the ability to share one's research in peer-reviewed journals. AAA's own world-class family of peer-reviewed journals, and our organization as a whole, will see significant harm from the proposed rule (§ 200.461) that will have a disastrous impact on the ability of our, and similar, publications to function. The rule would require federally funded researchers to make their findings freely accessible to the public, thereby reducing the viability of many important scientific journals like ours. At the same time, the rule would restrict researchers from using the funding to pay for the required open-access fees as well as other important publishing fees, thereby further reducing the access of these programs to institutions with fewer resources.

These provisions will not only negatively impact our nonprofit association and the many like ours in other scientific fields; they will further hamper the ability of scientific researchers to achieve the goals of the federal funding programs to effect positive results for American taxpayers in all areas of their lives, especially medical outcomes.

We join our many peers in scientific research in urging the OMB to entirely withdraw this proposed rule. Each of the provisions described above will place a significant undue burden on the ability of scientists to continue achieving the amazing advancements seen in medical science and other areas over the last century, which was thanks in large part to essential federal funding support. Taken together and all at once, and with an effective date so near in the future as October 1, 2026, this rule will have a draconian negative impact on the entire scientific community as well as the American citizens whose future health will be shaped by our important research. At minimum, we request an extension in the comment period to allow for more vital input from the scientific community and the removal of the specific provisions outlined above.

Respectfully submitted,

Anne Burrows, Ph.D.

President

American Association for Anatomy

Colby Shultz, CMP

Interim Executive Director

American Association for Anatomy

Cshultz@anatomy.org | 301-634-7907