



July 9, 2026

TO: Office of Management and Budget (OMB)

RE: Comment on Proposed Revisions to 2 CFR Part 200

Submitted to regulations.gov docket OMB-2026-0034

Mission and Importance of the Environmental Mutagenesis and Genomics Society

The Environmental Mutagenesis and Genomics Society (EMGS) was founded in 1969 by compelling evidence that exposure to environmental mutagens could cause human cancers and birth defects. EMGS members are biomedical researchers working toward: "A world where science drives sound decisions to protect peoples' health from environmental hazards." The end goals of these studies are to identify mutagenic agents, to understand their effects on human health, **and to minimize exposure of Americans to substances likely to cause cancer and birth defects.**

Mutagens damage deoxyribonucleic acid (DNA), the genetic "instructions" for all humans. Alterations to DNA can result in the malfunction and loss of growth control of cells, the very definition of cancer. The mutagenic exposures studied include a wide variety of agents, from pharmaceuticals to ambient industrial pollution.

EMGS Comments on OMB-2026-0034

Most EMGS members, including those employed in government agencies and US universities, are dependent on US Government funding for their research, and for this reason we believe OMB-2026-0034 would substantially undermine the work of our society.

EMGS strongly agrees that federal research funding must be accountable, transparent, and well-managed, and we support appropriate oversight of taxpayer dollars. We also recognize that federally funded academic research does more than produce discoveries: it trains the next generation of American scientists, including much of the federal scientific and regulatory workforce, and generates the data on which sound regulatory decisions depend. However, several provisions of this proposed revision to 2 CFR Part 200 would substitute political judgment for scientific peer review, destabilize multi-year research, and restrict the training and dissemination activities that build scientific careers.

EMGS urges OMB to revise the provisions identified below.

- 1) **A non-scientific review layer over the current 3-layer science-based peer review [proposed § 200.205(b)].** The rule requires agency heads to designate "senior appointees" to conduct a pre-issuance review of all discretionary awards. "Senior appointees (or their designee) must... apply the following principles... (1) Discretionary awards must, where applicable, demonstrably advance the President's policy priorities." Related criteria allow

agencies to weigh undefined factors such as "discredited or non-replicable studies" published by an applicant (proposed text, 91 FR 32250). The insertion of government evaluation into the grant application process would by-pass merit-based scientific peer review, substituting non-scientific, political elements. Implementation would substantially delay future discoveries, decimate the US scientific process, and assure that politics, rather than science, would be driving that process.

- 2) **Discretionary termination and suspension of active awards [proposed § 200.340(a)].** The rule permits an agency to terminate a Federal award, in part or entirely, if the Federal agency or pass-through entity determines that a termination is in the interests of the Federal government. If a Federal award is considered not to effectuate program goals, Federal agency priorities, or the national interest [as it exists at the time of the termination], an award can be suspended for up to 90 days. Because Federal agency priorities can change after an award is made, this allows cancellation of work already underway—wasting trained personnel, reagents, equipment, and irreproducible longitudinal and clinical data, with no path to recover the lost investment or the early-career scientists whose training depends on these projects.

The proposal states that "...[t]he overarching goal of OMB's proposed revisions is to improve transparency, accountability, and oversight for how Federal taxpayer dollars are used....". However, the proposed language in §200.340(a)(2) falls short of that goal. We urge OMB to ensure that the "brief" description of the reasons for the grant termination include a description of how the agency priorities have changed, including the articulation of the new priorities, a description of how those new priorities differ from previously articulated priorities, and a description of the administrative steps the agency has taken to promulgate the new priorities.

Related is **§200.342**, which eliminates the chance for a hearing or appeal when a grant is terminated. This is inconsistent with the transparency that is the stated goal of the proposed changes, and deprives the recipient of opportunities to demonstrate that the changes in priorities were consistent with administrative requirements. While a grantee may not be "in the best position" to evaluate Agency needs, a grantee may be in an excellent position to dispute an allegation that the subject matter of the grant is not well aligned with a current agency priority, compared to the priority at the time the grant was initiated. In addition, the patterns of spending within the grant period may be complex and obscure to the evaluating agency. Transparency and the legitimate interests of the grantee require the protection of review by a hearing officer or other disinterested party.

- 3) **Restrictions on international collaboration [proposed § 200.220 and R&D eligibility provision].** This rule prohibits using federal funds to support a bilateral or multilateral collaboration, agreement, program, or activity with a covered foreign country or covered foreign entity. It also limits R&D awards to entities organized under the laws of the United States, a State, or Tribal government, except where expressly authorized by statute or where a compelling interest exists, as determined by the agency's senior appointee. Biomedical research advances through international consortia, shared datasets and publication of results. Implementation of these limits would cede collaborative leadership and access to global talent, isolating American scientists from cutting-edge advances and inhibiting our ability to perform "Gold Standard Science".

- 4) **Publication and dissemination costs made unallowable [proposed § 200.461; conferences, § 200.432].** The rule provides that publication costs (including page charges, article processing charges, or similar fees such as open access fees for professional journal publications and other peer-reviewed publications) are unallowable under Federal awards, and that a general requirement to make results publicly available must not be construed as authorizing publication costs. Separately, the costs for attending conferences are allowable only if participation in the conference is expressly approved by the Federal agency. This conflicts with the mandate for American scientists to publish and present data obtained using Federal funds. These are not ancillary expenses: they are how findings reach the public and regulators who rely on them, and how students and postdoctoral fellows build the record required to become independent investigators and the nation's future scientific workforce.

Conclusion: EMGS supports rigorous stewardship of federal research funds. However, implementation of all of the provisions in OMB-2026-0034 would impair the merit-based, transparent, and collaborative system that trains American scientists, informs regulatory decision-making, and sustains US leadership, serving all Americans regardless of political affiliation. We urge OMB to revise §§ 200.205, 200.220, 200.340, 200.342, 200.461, and 200.432, accordingly. Aside from decimating American research, this is a gift to many other countries, who will readily and quickly surpass us in global scientific leadership.

Respectfully submitted,
Environmental Mutagenesis and Genomics Society