



Society for Prevention Research
Opposition to OMB Proposed Rule: Regulation for Federal Financial Assistance
July 9, 2026

On May 29, 2026, the U.S. Office of Management and Budget (OMB) released the proposed Federal Financial Assistance Rule (Docket OMB-2026-0034; Federal Register Number 2026-10817). ***The Society for Prevention Research (SPR) strongly opposes these proposed revisions to federal grantmaking regulations.*** SPR is an international, multidisciplinary organization dedicated to advancing prevention research to support a society in which *all* individuals and communities can succeed. SPR advances scientific understanding of the root causes of social, physical, mental health, and academic problems, and translates that knowledge to prevent or reduce problems and promote health and well-being. We are also committed to the international dissemination of prevention science, including broad access to peer-reviewed published research for scientists, practitioners, advocates, administrators, and policymakers – efforts that strengthen the visibility and global influence of prevention research conducted in the United States. Founded in 1991, SPR includes 700 members worldwide (650 members in the U.S.).

The proposed rules would hinder the ability of prevention science to generate and apply high-quality evidence by constraining the methods, partnerships, and processes that support rigorous research and by weakening the role of scientific merit in federal funding decisions. As such, they represent a significant threat to SPR's mission and to the broader ability of prevention scientists to improve health, well-being, and opportunity for individuals, families, and communities.

This response begins with an overview of prevention science and its public value, then examines the specific provisions SPR opposes and the implications of those provisions for the generation, dissemination, and use of evidence. It concludes with recommendations for preserving scientific integrity, maintaining effective stewardship of federal funds, and ensuring that federally supported research continues to improve health and well-being in the United States.

Purpose and Impact of Prevention Science

At its core, prevention science seeks to (1) identify promotive factors that support healthy development, risk factors that increase the likelihood of adverse health, behavioral, and academic outcomes, and protective factors that reduce the effects of risk; (2) develop and evaluate preventive interventions that address these factors at the individual, family, school, community, and systems levels; and (3) determine effective strategies for implementation, dissemination, and scalability of these interventions. Its contributions to generating rigorous evidence on the conditions, processes, and mechanisms that shape health outcomes have important implications for the United States. Prevention science is uniquely positioned to strengthen national research efforts and improve population health by examining biological, behavioral, social, and environmental factors that cut across

diseases and conditions. By targeting shared drivers of health and well-being – such as stress regulation, social connection, sleep, and exposure to adversity – this work yields insights that are relevant across a wide range of mental health and behavioral outcomes and advances understanding of how health develops over time.

Prevention research is essential, because many costly and burdensome outcomes emerge long before clinical symptoms appear. By focusing on modifiable risks, prevention science improves population health, reduces morbidity, and enhances the long-term return on public research investments. Multi-disciplinary initiatives that prioritize early intervention, lifespan perspectives, and the factors that shape health and well-being accelerate progress toward national goals to enhance health, extend life, and reduce illness and disability. Prevention science complements disease-specific and biomedical research by identifying factors that influence health before problems develop, translating scientific discoveries into preventive interventions, and evaluating how those interventions perform across different populations, settings, and stages of life. In sum, it strengthens decisions about policies, programs, and services by providing evidence on the scale, durability, and real-world relevance of health impacts across populations, life stages, and settings.

Concerns about the Proposed Rules

As written, SPR has concerns about the following provisions:

- § 200.202, § 200.204, § 200.205, § 200.218, § 200.220, § 200.300, § 200.340, § 200.432, § 200.450, § 200.454, and § 200.461.

These provisions are presented in numerical order for clarity rather than relative importance. ***Each raises substantive concerns that, individually and collectively, have significant implications for the advancement of prevention science and its ability to improve health and well-being.***

1. **§ 200.202 — Programs must align with administration priorities:** *OMB proposes to revise § 200.202(a) to further clarify the elements of program design. As “goals and objectives” do not directly “provide” meaningful results, OMB proposes to clarify that the goals and objectives must “aim to achieve meaningful results.” OMB also proposes to clarify that goals and objectives must be consistent with the public purpose of Federal authorizing legislation and aligned with administration policies and priorities.*

OMB proposes to revise § 200.202(a) to clarify that program goals and objectives must aim to achieve meaningful results and must be consistent with the public purpose of the authorizing legislation, while also aligning with current administration policies and priorities.

Scientific research and program development are most effective when guided by established evidence, methodological rigor, and clearly defined public needs. These processes depend on continuity and consistency to produce reliable and objective findings that can inform practice and policy over time. While administration priorities may evolve, many of the challenges addressed through federally funded research – including mental health, substance use, and chronic disease – extend beyond any single administration and require sustained scientific attention over time.

SPR is extremely concerned that the proposed revisions to § 200.202 would diminish these scientific standards and more explicitly tie the design and approval of federally funded research to political priorities, extending beyond alignment with statutory intent. In practice, this provision could require researchers to redesign studies in response to changing policy priorities, even when the original research plan is scientifically sound, addresses the goals of the grant program, and is consistent with the statutory purposes established by Congress. Maintaining a degree of separation between scientific decision-making and evolving policy agendas helps ensure that research remains objective, credible, and broadly applicable. This independence is essential for producing findings that can inform policymakers across administrations and support the consistent use of evidence in policy and program decisions over time.

Requiring closer alignment between federal grant program goals and current administration priorities introduces a source of variability that may change across funding cycles. Prevention science depends on the ability to pursue long-term research questions based on evidence and population needs rather than short-term shifts in administration priorities. This can make it more difficult to sustain coherent, multi-year research and long-term partnerships with schools, healthcare systems, and communities. It may also discourage work in areas that remain critical to public well-being but are not emphasized at a given point in time.

The implications for the effectiveness of public investments are significant. When research priorities shift frequently or become closely tied to evolving policy agendas, there is a greater risk of fragmentation in the evidence base and reduced continuity across studies. Fragmentation of research will limit the ability to build cumulative knowledge, slow the translation of findings into practice, and reduce the public health impact of federally funded research.

SPR supports clearly defined funding goals, measurable outcomes, and alignment with the statutory purpose of federal research funding programs. However, existing safeguards – such as the peer review process, established agency strategic planning efforts, program evaluation requirements, progress reporting, and federal grants oversight mechanisms – already provide robust means to ensure that research is scientifically rigorous, aligned with public priorities, and accountable for the responsible use of federal funds. Preserving the independence and stability of the scientific enterprise is essential for ensuring that federally funded research continues to generate reliable evidence, inform effective programs and policies, and support evidence-based decision-making at the federal, state, and local levels to improve outcomes for individuals, families, and communities across the United States.

2. **§ 200.204—Notices of Funding Opportunities:** *OMB proposes to revise in § 200.204 to clarify, supplement, and revise the government-wide policy regarding notices of funding opportunity, commonly referred to as NOFOs. OMB proposes to require that Federal agencies must publicly announce funding opportunities for all discretionary awards—not just those that will be openly competed. Consistent with the definition of discretionary award and longstanding practice, OMB also proposes to clarify that, as appropriate and consistent with authorizing law, funding opportunities may allow for open competition, limited competition, or selection on a non-competitive basis. OMB also proposes to revise the requirement that opportunities be posted for no less than 30 days unless the agency determines that exigent circumstances exist. Under the proposed revision, agencies would be required to include such a determination in the NOFO.*

OMB proposes to revise § 200.204 to require that federal agencies publicly announce funding opportunities for all discretionary awards, including those designated for limited or noncompetitive selection, and to document any determination allowing for shortened application timelines.

SPR believes the proposed revisions to § 200.204 will introduce additional procedural requirements in an area where transparency and public notice are already well established. Federal agencies currently provide extensive visibility of funding opportunities through centralized platforms such as Grants.gov, agency websites, advance notices, and funding forecasts. These systems already include detailed information on eligibility, application requirements, review criteria, and award decisions, and operate within well-defined oversight and accountability mechanisms.

Through these existing processes, the research community and public already have substantial access to information about funding opportunities and award decisions, while agencies maintain established safeguards to ensure transparency and accountability. Expanding requirements to include all discretionary opportunities, regardless of whether they are intended for open competition, may not meaningfully increase transparency but could introduce unintended inefficiencies.

Requiring agencies to publicly post funding opportunities that are limited in scope or designed for specific purposes may create confusion about eligibility and the intent of those awards. Applicants may invest time and resources in pursuing opportunities that are not aligned with their qualifications or the agency's intended recipient pool. In addition, public announcement of limited-competition and noncompetitive funding opportunities may increase administrative burden without meaningfully expanding access to funding. Because these opportunities are often established for specific statutory, programmatic, or partnership purposes, public posting may generate applications from entities that are not eligible to participate while providing little additional transparency beyond existing agency reporting and oversight requirements. At the same time, additional procedural steps may slow the release of time sensitive funding, particularly in cases where agencies need to respond quickly to emerging public health or community needs.

These changes may also reduce agencies' ability to manage targeted initiatives and sustain established partnerships, which are often essential for effective implementation in real world settings. Prevention research frequently depends on coordinated efforts with schools, healthcare systems, and community organizations that require timely and flexible funding mechanisms. Administrative delays or increased complexity in funding announcements may hinder the ability to support these efforts efficiently.

SPR supports clear communication and transparency in federal funding processes. However, the current system already provides multiple, well-functioning avenues for public notice and accountability. We believe adding further requirements will increase administrative burden without improving outcomes, potentially slowing the timely deployment of resources and reducing the overall efficiency of federal research investments.

3. § 200.205 — Political appointee review of grants: *OMB proposes to revise § 200.205 to strengthen requirements for agency merit review and to establish a new pre-issuance*

review process consistent with Executive Order 14332. Under the proposed requirements for pre-issuance review, as part of the broader merit review process, agencies must ensure that proposals selected for funding are consistent with applicable law, Federal agency priorities, and the national interest. Consistent with the Executive order, senior appointees must conduct these reviews and apply specific principles when evaluating proposals. These principles include ensuring that discretionary awards advance the President's policy priorities, prohibit the use of funds for discriminatory or otherwise impermissible purposes, and emphasize ensuring compliance with applicable law.

SPR observes that § 200.205 would introduce a new pre-award layer of review by senior political appointees, allowing funding decisions to be reconsidered after completion of established scientific merit review processes. As we understand §200.205, this provision would require agency leadership to assess whether proposed awards align with current administration priorities and the national interest, with the authority to approve or potentially override decisions grounded in peer-reviewed scientific evaluation.

Our professional organization supports appropriate oversight and alignment with federal priorities; however, these objectives are already built into longstanding merit review systems, agency procedures, and statutory requirements. The prevention science field depends on rigorous, transparent, and independent review by experts with extensive training in research methods and the scientific fields relevant to the proposed work. These peer-review processes are designed to ensure that funding decisions are based on scientific quality, innovation, and potential impact. They also provide a consistent framework for evaluating proposals across time, helping to ensure that funding decisions remain stable, predictable, objective, and grounded in evidence. Introducing an additional stage of review that is not rooted in this same system of scientific expertise risks shifting decision-making toward political considerations.

This added layer of review could create uncertainty about how funding decisions are ultimately made, reducing confidence in the objectivity and consistency of the process. Over time, this may discourage researchers from pursuing long-term work addressing complex health and social challenges, particularly if project viability becomes less predictable. It may also affect early-career investigators and interdisciplinary teams, who often depend on stable and clearly defined review criteria to compete effectively for funding. These dynamics can fragment research efforts, shorten time horizons, and reduce the likelihood that projects will generate meaningful, sustained impact.

The implications for the long-term return on public research investments are significant. Federal research funding is designed to support high-quality studies that generate reliable knowledge, inform effective interventions, and ultimately reduce costly social and health problems. When funding decisions become less consistently anchored in scientific merit, the efficiency of these investments will decline. Resources may be directed toward projects that are less likely to produce durable, generalizable evidence, diminishing the overall value generated for taxpayers. In contrast, stable, merit-based funding processes help ensure that public dollars support research with the greatest potential to yield long-term benefits, including reduced healthcare costs, improved educational outcomes, and healthier, safer, and more resilient communities.

The broader consequences for the United States are considerable. When the evidence base is weakened or develops more slowly, practitioners and policymakers have fewer high-

quality tools to guide decisions in schools, healthcare systems, and community programs. This can lead to the adoption of less effective approaches, missed opportunities for prevention, and higher long-term costs associated with untreated or poorly addressed challenges such as mental health disorders, substance abuse, and chronic disease. Ultimately, disruptions to the integrity and consistency of the research funding process can reduce the extent to which federally funded science delivers tangible benefits to the public.

Preserving independent, scientific expert-led review processes is essential for maintaining confidence that funding decisions are guided by scientific merit and consistent standards over time. Introducing an additional layer of review that may vary across federal administrations risks reducing predictability in funding decisions, weakening the return on public research investments, and undermining the stability needed to support high-quality, impactful research that improves population well-being.

- 4. § 200.218 — Prohibition of using Federal awards to promote or support theories of disparate-impact liability:** *OMB proposes a new § 200.218 related to Executive Order 14281, “Restoring Equality of Opportunity and Meritocracy.” Consistent with the Executive order, this section proposes to establish a government-wide policy in 2 CFR regarding use of Federal financial assistance to promote or support theories that impose disparate-impact liability based on federally protected characteristics such as race, sex, or age. OMB proposes to direct agencies and pass-through entities, to the maximum extent permitted by law, to ensure that awards are administered in a manner that does not promote or support theories of disparate-impact liability, including by not issuing terms, conditions, or guidance that would advance theories of disparate-impact liability. Recipients and subrecipients are also directed to avoid using Federal award funds for this purpose unless expressly required by law.*

OMB proposes to establish § 200.218, consistent with Executive Order 14281, to prohibit the use of federal funding to promote or support theories of disparate-impact liability, under which a policy or practice may be considered harmful or unfair if it produces unequal outcomes across groups based on protected characteristics such as race, sex, or age, even in the absence of intentional discrimination. The proposed rule directs federal agencies and funding recipients to avoid advancing or incorporating such approaches in funded activities, guidance, or evaluation criteria, except where explicitly required by law.

Disparate impact is a legal concept addressing whether a policy or practice, while neutral on its face, produces disproportionate negative effects on groups protected under statute, even in the absence of intentional discrimination (source: What Is Disparate-Impact Discrimination? Congress.gov, Library of Congress: <https://www.congress.gov/crs-product/IF13057>). Analyses of disparate impact have been applied in specific statutory contexts, including employment, housing, lending, and disability law, and typically require evidence that a particular policy causes a substantial difference in outcomes that cannot be justified by a legitimate purpose.

Examining differences in outcomes, however, also serves important scientific and evaluative purposes beyond questions of legal liability. In prevention research, these analyses help researchers understand which approaches work best for different populations and contexts to improve program effectiveness, inform implementation, and support the efficient use of public resources. The goal is to strengthen services and guide the effective use of taxpayer

dollars, not to establish legal liability under statutes governing areas such as employment, housing, or disability discrimination.

Our professional society is concerned that the proposed provision does not clearly distinguish between disparate-impact liability as a legal doctrine and the routine scientific and evaluative methods used in prevention research. Without clearer distinctions, researchers, institutions, and federal agencies may curtail well-established scientific and evaluative practices out of concern that they could be interpreted as inconsistent with the rule.

In sum, §200.218 represents an expansive restriction that would substantially limit how federally funded research and programs examine outcomes in practice. Under this provision, federal funds could not be used to support analyses, studies, or program design decisions informed by observed differences in how programs perform for different groups. As a result, § 200.218 would significantly narrow the tools available to understand how policies, programs, and systems function in real-world conditions. Limiting the ability to examine differences in outcomes does not eliminate those differences; it reduces the capacity to identify unintended effects and make evidence-informed improvements to federally funded programs.

This limitation may also be difficult to reconcile with recent federal research priorities that emphasize moving beyond documenting differences in outcomes toward developing and implementing effective solutions. Achieving these goals requires the ability to use evidence on how outcomes vary across populations and contexts to refine interventions, inform implementation, and improve results. Without these analytic approaches, efforts to generate actionable, solution-oriented evidence will be constrained.

SPR supports ensuring that federally funded activities comply with applicable law and reflect clearly defined federal priorities. However, existing statutory and regulatory frameworks already provide robust safeguards for oversight and compliance. Within this existing structure, evaluating how programs perform in practice, including whether outcomes vary across populations or contexts, is a standard and necessary component of rigorous research and program evaluation. The proposed restriction extends beyond compliance and instead limits the ability to generate and apply evidence that is essential for program improvement. The types of analyses restricted under §200.218 are central to the prevention science field's ability to produce meaningful, decision-relevant findings. These analyses help distinguish between approaches that are broadly effective and those that require adaptation, refinement, or discontinuation.

The proposed restriction would also shape how federal agencies and funded entities define success, develop guidance, and evaluate program impact. Narrowing the scope of allowable analyses reduces the precision and practical usefulness of the evidence base. This, in turn, limits the ability of decision makers in schools, health care systems, and community settings to rely on federal research to design and implement effective programs. Over time, this may weaken the alignment between federally supported interventions and the conditions in which they are delivered.

The proposed §200.218 rule has direct implications for the efficient use of public resources. When differences in outcomes cannot be examined or acted upon, programs may be implemented without a clear understanding of who benefits, in what settings, and under

what conditions, increasing the likelihood of investing in approaches that yield uneven or suboptimal results. The issue is not that prevention science depends on theories of disparate-impact liability. Rather, the concern is that the proposed rule may inadvertently restrict routine scientific analyses that are essential for determining what works, for whom, and under what conditions. Maintaining the ability to examine and respond to these differences is therefore essential to producing actionable knowledge and maximizing the return on federal research investments for the American public.

- 5. § 200.220 — Foreign collaboration prohibition:** *The proposed § 200.220 establishes a government-wide baseline rule prohibiting recipients and subrecipients from using Federal funds to support bilateral or multilateral collaborations, agreements, programs, or activities with covered foreign countries or covered foreign entities, unless expressly authorized by Federal statute or approved by the Federal agency in accordance with the proposed exception authority and applicable law. The prohibition would apply regardless of whether Federal funds are used for direct programmatic activities, research, technical assistance, travel, or indirect costs allocable to such collaborations. This approach would ensure that restrictions on foreign collaboration – including those expressly required by law – are not circumvented through the structure of funding mechanisms or cost allocation practices. The proposed rule also provides for limited exceptions where expressly authorized by Federal statute or where the head of the Federal agency (or designee) determines that the activity does not pose a risk to national security and is in the national interest of the United States.*

SPR notes concern that § 200.220 would create sweeping constraints on federally funded international collaborations by requiring explicit approval for activities that are currently central to prevention science. As written, this provision would apply across research, data sharing, technical assistance, and even indirect costs, creating substantial barriers to the partnerships that are essential to rigorous and impactful prevention science.

International collaboration is a cornerstone of high-quality research, fostering the exchange of expertise, data, and innovative approaches across scientific communities. Many of the most pressing challenges prevention science seeks to address – mental health, substance use, crime, physical health, and educational outcomes – are complex, multifaceted, and not confined by national borders. Advancing knowledge in these areas depends on access to multiple populations, cross-national data, shared methodological expertise, and coordinated research efforts. Limiting these collaborations would narrow the scope of inquiry, reduce the generalizability of findings, and constrain innovation.

Such restrictions would also undermine the ability of U.S. researchers to participate in and lead global scientific efforts that are shaping the future. For example, international initiatives focused on “living” evidence syntheses – where findings are continuously updated as new data emerge – depend on shared infrastructure, pooled data, and coordinated contributions across countries. Private international funders such as the Wellcome Trust and collaboratives like the Evidence Synthesis Infrastructure Collaborative are investing in these models precisely because no single country or organization can sustain the necessary scale alone. Without the ability to engage fully in these efforts, U.S.-funded researchers risk exclusion from the networks that are defining next-generation scientific standards and tools.

Over time, this would erode U.S. leadership in prevention science. While other countries continue to invest in global research partnerships, U.S. scientists would face increasing isolation, limiting their competitiveness and reducing opportunities to shape international research agendas. This shift carries tangible consequences: it cedes scientific influence, slows the pace of discovery, and reduces the nation's ability to respond effectively to emerging health and social challenges.

In addition, international partnerships often support the adaptation, testing, and scaling of interventions across varied contexts, generating insights about what works, for whom, and under what conditions. Restricting these partnerships weakens this learning process and reduces the field's ability to refine and improve interventions. Communities across the United States, particularly those already facing resource constraints, stand to lose access to more effective, well-tested approaches as a result.

SPR recognizes the importance of protecting national interests and minimizing potential risks associated with international collaboration. However, § 200.220 introduces a broad, preemptive restriction in a context where longstanding safeguards, review processes, and agency oversight have historically allowed the United States to remain a global leader in prevention science without compromising national security. The proposed approach would impose significant constraints on well-established, high-value collaborations that have not been shown to pose systemic risk. In doing so, it may restrict well-established scientific collaborations without clear evidence that such broad limitations are necessary to address a significant or widespread threat. A more targeted, risk-based framework – one that addresses specific, clearly defined concerns while preserving the ability to engage in legitimate international collaborations – would better support both national interests and the continued advancement of science.

Maintaining the ability to engage in international collaboration is essential for ensuring that prevention science remains rigorous, innovative, globally competitive and, most importantly, capable of improving the health and well-being of people across the United States.

- 6. § 200.300 — DEI and gender ideology prohibitions:** *OMB proposes to amend paragraph (b) of § 200.300, to provide that, in administering Federal awards the Federal agency or pass-through entity must ensure that the Federal award is not used to fund, promote, encourage, subsidize, or facilitate: Diversity, equity, and inclusion” (DEI) or “diversity, equity, inclusion, and accessibility” (DEIA) policies, principles, or practices. Gender ideology as defined in Executive Order 14168. Gender ideology includes theories or ideologies that deny the biological reality of sex or the sex binary in humans, or endorse or advocate for the notion that sex is a chosen or mutable characteristic (the “Gender Ideology Provision”).*

SPR is concerned that the proposed revisions to § 200.300 would limit federally funded research, interventions, research training grants, and dissemination efforts that examine variation across populations, contexts, and developmental stages. Although the provision is framed as a restriction on DEI- and gender ideology-related activities, the language could be interpreted broadly enough to discourage research and evaluation that examine differences in outcomes across populations, even when conducted for scientific, programmatic, or evaluative purposes. By constraining the ability to study how outcomes and intervention effects differ across groups, this provision risks narrowing the scope of the evidence base

and reducing the field's capacity to generate precise, effective, and useful evidence for decision-making. The provision may also create uncertainty for federally supported research training programs that prepare the next generation of scientists to study variation in outcomes, implementation, and intervention effectiveness across populations and contexts. Understanding how outcomes vary across populations is essential for determining whether interventions are effective in the communities and settings they are intended to serve and for improving their implementation over time. This approach is also difficult to reconcile with recent federal research priorities that emphasize moving beyond documenting differences in outcomes toward implementing effective solutions.

The restrictions imposed by § 200.300 have direct implications for the effective use of taxpayer dollars. Prevention science is designed to identify which programs and interventions work, for whom, and under what conditions, so public investments can be directed toward strategies that deliver the greatest impact. When research cannot assess variation across populations or contexts, programs may be implemented broadly without clear evidence of effectiveness in the communities they are meant to support. This increases the likelihood of investing in approaches that require costly modification after implementation. In contrast, robust, population-informed evidence allows decision-makers to target resources more efficiently, avoid ineffective strategies, and maximize the return on public investment.

A reduced ability to generate evidence on how interventions perform across populations can lead to higher long-term costs. When prevention efforts are less effective, avoidable challenges – such as mental health conditions, substance use disorders, and school failure – may persist or worsen, increasing demand for healthcare, social services, and educational supports over time. Evidence-based preventive interventions have been shown to reduce these later costs. Limiting the research needed to develop, refine, and implement such interventions may therefore result in greater financial burdens on public systems and taxpayers in the future.

Maintaining the ability to study how outcomes vary across populations is therefore not only a scientific priority, but a fiscal one. It ensures that federally funded research produces actionable findings that support efficient, targeted, and cost-effective use of public resources, while improving outcomes for individuals, families, and communities across the United States.

7. **§ 200.340 — Grant termination:** *OMB proposes to revise § 200.340(a) reasons available to Federal agencies for discretionary terminations of Federal awards, and also to add new provisions regarding temporary suspension of Federal awards. An agency, in its discretion, may elect to engage with recipients through some form of administrative review process before or after a discretionary termination or suspension, but would not be required to except as necessary to provide notice, determine allowable costs, and implement other sections of the regulatory text.*

OMB proposes to revise § 200.340(a) to expand the reasons available to federal agencies for discretionary termination of awards and to introduce new provisions for temporary suspension. Under the proposed rule, agencies may choose to engage in an administrative review process before or after termination or suspension but would not be required to do so beyond basic notice and implementation requirements.

SPR is particularly concerned that the proposed revisions to § 200.340 would broaden agency authority to terminate or suspend discretionary awards with limited opportunity for review, response, or corrective action. In effect, multi-year research projects could become subject to termination based on shifting administrative priorities, even after undergoing rigorous peer review, receiving funding, and beginning implementation.

Prevention science often relies on multi-year studies, including longitudinal research, randomized trials, and community-based partnerships that depend on sustained funding, continuity, and trust. The possibility of abrupt termination would make it more difficult for higher education institutions and research organizations to recruit and retain staff, maintain partnerships with schools and community organizations, enroll and safeguard research participants, and complete the data collection needed to produce valid and reliable findings.

The proposed approach could also influence the types of research investigators are willing to pursue. When funding stability is uncertain, researchers may be less likely to undertake ambitious, long-term studies or to engage in complex work addressing emerging or critical topics. This is particularly true for early-career investigators, who depend on predictable funding environments to build research programs and contribute to the evidence base.

These dynamics also raise concerns about the long-term strength of the U.S. research workforce. When federally funded research becomes less predictable, highly trained scientists may seek opportunities in other countries where research funding systems offer greater stability and continuity. Over time, this can contribute to the loss of talent and expertise, weakening U.S. leadership in prevention science and reducing the nation's capacity to generate high-quality, policy-relevant evidence. This will ultimately have direct implications for the health and well-being of the individuals and communities it serves.

The implications for the effective use of public resources are significant. Federally funded research is designed to generate knowledge that informs policy, improves programs, and delivers long-term benefits to the public. When projects are terminated midstream for reasons unrelated to scientific quality or performance, prior investments in study design, staffing, and implementation are unlikely to yield usable results. This reduces the overall return on taxpayer investment and increases the likelihood that additional funds will be needed to address the same questions in the future.

SPR supports strong accountability and clear alignment of federally funded activities with legal and policy requirements. At the same time, existing grant management frameworks and agency authorities provide established procedures to address noncompliance and performance issues. Expanding discretionary termination authority without consistent review processes introduces avoidable uncertainty into the funding environment and will undermine the stability needed to support high-quality, impactful research.

Maintaining a predictable and transparent framework for grant oversight is essential to ensuring that federally funded research can be completed as designed, produce reliable evidence, and ultimately improve outcomes for individuals, families, and communities across the United States.

- 8. § 200.432 – Conference attendance pre-approval:** *OMB proposes to expand § 200.432 to add a requirement that costs for attending conferences are allowable only if*

participation in the conference is expressly approved by the agency and included in the terms and conditions of the award.

Conferences are central to the infrastructure of prevention science, serving as key venues for disseminating findings, fostering interdisciplinary collaboration, and connecting researchers with practitioners, funders, and policymakers. SPR's annual meeting – attended on average by 850 participants from research, practice, and policy sectors across the United States and globally – illustrates the critical role these convenings play in advancing and translating prevention research.

Limiting conference participation in this way would have significant consequences. Conferences provide a primary forum for rapid sharing, critical review, and application of new knowledge. Requiring approval at the time of award issuance would reduce flexibility, limit participation in emerging scientific exchanges, introduce a time-consuming layer of bureaucracy, and ultimately delay the dissemination of new evidence in a field that depends on timely interaction across disciplines and sectors.

This requirement also poses a serious threat to the financial viability of scientific conferences, including SPR's annual meeting. These events depend heavily on participation from federally funded researchers, many of whom cannot predict attendance or secure approval years in advance when grants are awarded. If conference participation must be specified at the outset, many researchers will be unable to include travel due to uncertainty about timing, funding, or evolving research needs. Reduced participation would directly affect registration revenue, which supports conference operations. Because professional societies organize these meetings on tight budgets – with venue contracts, staffing, and programming costs committed well in advance – substantial declines in attendance could render conferences financially unsustainable, jeopardizing their continuity.

For prevention science and SPR as an organization, this would weaken a core mechanism for collaboration and knowledge exchange. Conferences are where partnerships are formed, findings are translated into practice, and evidence is shared with those implementing programs in schools, communities, and service systems. Limiting participation would slow these processes, reducing the field's ability to inform timely decisions and improve well-being across the United States.

- 9. § 200.450 — Lobbying:** *OMB proposes to revise § 200.450 to consolidate references to OMB memoranda. OMB also proposes to add three new paragraphs under this section. Paragraph (c)(1)(iii) would expressly prohibit funding any voter registration campaigns, drives, or related activities under Federal awards. Paragraph (c)(1)(iv) would prohibit using Federal funds to engage in issue advocacy or public messaging that promotes or opposes a particular social, political, or public policy position unrelated to the statutory objectives or performance requirements of the Federal award, including messaging designed to influence public attitudes on matters not necessary to accomplish the purpose of the Federal award. The authority for this change is similar to other provisions discussed above, which are focused on aligning use of Federal award funds with core authorized purposes only, not extraneous activities on divisive policy matters or issue advocacy. Paragraph (c)(1)(v) would prohibit using Federal funds to influence the executive branch of any State government on matters unrelated to the objectives or performance requirements of the Federal award, including attempts to affect State agency*

policymaking, rulemaking, or administrative actions for purposes other than carrying out objectives of the Federal award.

OMB proposes to expand § 200.450 to limit the use of federal funds for certain types of public communication and advocacy that could be interpreted as influencing policy, legislation, or public opinion. While intended to prevent the use of federal funds for partisan political activity or lobbying, the scope of this provision is broad and lacks clear boundaries and clarity about what communication is allowable, raising concerns that it could extend to routine communication of research findings with policymakers, practitioners, and the public.

SPR is concerned that the proposed revisions to § 200.450 may substantially constrain the ability of prevention scientists to share research findings beyond academic publications. Communicating results to policymakers, practitioners, and community partners is a standard and expected component of federally funded research, particularly in a field focused on improving outcomes in real-world settings. Prevention science not only generates knowledge but also informs decisions in education systems, public health agencies, and community programs. The communication of research findings is intended to inform decisions through objective, evidence-based information, not to promote partisan positions or advocate for specific legislative outcomes. Limiting these forms of communication could weaken the connection between evidence generation and its application and reduce the visibility and accessibility of federally funded research.

This concern is especially relevant for prevention science, which focuses on identifying strategies that improve health and well-being across populations. The impact of this work depends on timely and accurate communication among those responsible for implementation. If uncertainty about allowable communication discourages engagement with state and local agencies, school systems, or health departments, the translation of evidence into practice will be slowed or halted. There are also implications for how federal investments achieve public benefit. Federally funded research is intended to generate knowledge that improves programs and informs decision-making. When findings cannot be effectively communicated to those responsible for implementation, the usefulness of that research is reduced. This may lead to slower uptake of effective practices, less informed decisions, and diminished return on public investment.

It is also important to recognize that federal statutes, regulations, and long-standing guidance have already established clear boundaries around lobbying and the appropriate use of federal funds. Significant public resources have been invested over decades to build this framework, which supports both accountability and the responsible use of federal funding while allowing evidence to inform timely decision-making. Introducing broad and uncertain new restrictions risks disrupting a system that is already functioning well, without clear evidence that such changes would improve oversight. Altering established practices in ways that limit the flow of evidence will reduce the value of prior investments and create inefficiencies, rather than strengthening the integrity of federally funded activities.

In addition, limiting the exchange of research findings between investigators and governmental or community partners may weaken the broader evidence ecosystem. Federal and state agencies often rely on externally generated research to fulfill statutory

expectations for evidence-informed policymaking. Constraining communication pathways may make it more difficult to align research outputs with policy and program needs.

SPR favors efforts to ensure that federal funds are not used for partisan political purposes. At the same time, it is important to clearly distinguish between prohibited lobbying activities and the responsible, evidence-based communication of research findings. Maintaining the ability to share findings with relevant stakeholders, including policymakers, is essential to ensuring that federally funded research fulfills its intended public purpose.

Without clearer parameters, § 200.450 may unintentionally limit the responsible dissemination of scientific evidence, reduce the practical impact of prevention science, and constrain its contribution to improving health and well-being across the United States.

10. § 200.454 – Memberships, subscriptions, and professional activity costs: *OMB proposes to revise §200.454 to clarify that the only allowable costs under this section are those necessary to fulfill the award requirements. OMB also proposes to add a requirement for prior approval of the Federal agency.*

SPR's flagship journal is *Prevention Science*, which serves as an interdisciplinary forum for advances in the theory, research, and practice of prevention science. It covers etiology, epidemiology, and intervention across a wide range of health and social outcomes, including substance use, mental health, teen pregnancy, suicide, violence, HIV/AIDS, and chronic illness.

The proposed revision to § 200.454, which would render academic journal subscriptions unallowable under federal awards, raises significant concerns about access to the scientific literature on which prevention research and evidence-informed decision-making depend. Access to peer-reviewed journals is foundational to conducting, synthesizing, and translating prevention science. Such access enables researchers, practitioners, and policymakers to stay current with emerging evidence and apply it to complex social, behavioral, and health challenges. Limiting access will impede scientific progress, slow the dissemination of knowledge, and reduce the impact of federally funded research.

As noted earlier, prevention research is essential because many costly and burdensome outcomes emerge long before clinical symptoms appear. By focusing on modifiable risks throughout the life course, prevention science improves population health, reduces downstream morbidity, and strengthens the return on public research investments. These benefits depend on a continuous exchange of high-quality, peer-reviewed evidence. Without access to the current literature, researchers cannot build on prior findings, practitioners cannot implement the most effective approaches, and policymakers cannot make informed decisions grounded in the best available evidence.

Restrictions on journal access would also undermine the credibility and authority of prevention science. Peer-reviewed publications are the primary mechanism through which research is rigorously evaluated, validated, and recognized as reliable. Limiting access to this body of work would weaken the field's ability to uphold scientific standards, reduce transparency, and erode confidence in research findings. Over time, this could diminish trust in prevention science among practitioners, policymakers, and the public.

The implications extend directly to the well-being of U.S. communities. When access to evidence is constrained, the adoption of effective programs slows, ineffective or outdated approaches may persist, and opportunities to intervene early are missed. This would reduce the effectiveness of prevention efforts in schools, healthcare systems, and community settings, ultimately leading to higher long-term costs, poorer health outcomes, and reduced quality of life.

In sum, limiting the allowability of journal subscriptions under §200.454 would not only impede scientific progress but also weaken the foundation upon which prevention science informs practice and policy.

11. § 200.461 — Publication costs: *OMB proposes to revise §200.421 to specify that all advertising and public relations costs are unallowable with limited exceptions. The only exception for public relations costs are those required by statute. Advertising costs are allowable if required by statute or if they are for the procurement of goods and services for the Federal award; the disposal of certain scrap or surplus materials; or program outreach and other specific purposes necessary to meet the Federal award requirements. These proposed revisions would clarify that advertising and public relations costs that do not benefit the Federal award are not allowable.*

SPR is deeply concerned about the proposed revisions to § 200.461, which would make publication costs – including article processing charges and open-access fees – unallowable unless explicitly required by statute or pre-approved by the agency. Under this proposal, researchers’ ability to publish and share findings could be constrained by case-by-case approval processes that introduce delay and uncertainty. This change would have significant consequences for SPR and the broader prevention science field.

Broad dissemination of findings is key to the translation of research to practice in the real world. Peer-reviewed publication is foundational to this process. It is how research is rigorously evaluated, validated, and improved by independent experts who have spent years training in prevention science and related disciplines. This expert peer review ensures that findings meet established scientific standards before entering the broader evidence base. While practitioners and policymakers may not routinely read individual academic articles, without open access they will not be able to obtain these materials when they need to do so. In addition, their decisions often rely on resources built from this vetted literature – such as evidence-based program registries, clinical and public health guidelines, systematic reviews, policy briefs, and technical assistance provided through federal and state agencies. SPR’s flagship journal, *Prevention Science*, and related outlets, play a central role in ensuring that research can be accessed, assessed, and incorporated into tools that guide real-world decisions.

If publication costs are not allowable, federally funded studies may face delays or barriers to dissemination, directly undermining federal public-access goals and limiting the availability of research needed to develop evidence-based resources that support decision-making. This proposal also appears difficult to reconcile with federal policies intended to make the results of federally funded research freely available to the public. Many federal agencies now require or strongly encourage open access to publications resulting from federally funded research. If grantees are expected to provide public access to their findings but are unable to charge reasonable publication and open-access costs to federal awards, institutions and investigators may face significant challenges in meeting those expectations.

This may delay dissemination, reduce public access to research, and require institutions to redirect limited resources to cover costs previously supported through federal awards. Without timely publication, new findings cannot be incorporated into the research-informed resources that schools, healthcare providers, community organizations, and policymakers rely on to make informed decisions about programs, policies, and services. This slows the translation of research into practice and reduces the overall value of federal research investments.

The downstream effects on U.S. populations would be meaningful. When evidence is delayed or inaccessible, decision-makers in schools, healthcare systems, and community organizations must rely on incomplete or outdated information. This increases the likelihood that less effective or untested programs are selected, reducing the impact of prevention efforts aimed at improving mental health, reducing substance use, and promoting healthy development. Over time, this can lead to missed opportunities to prevent problems before they escalate, resulting in higher long-term costs and avoidable harm to individuals, families, and communities.

These effects are particularly pronounced in settings that rely heavily on publicly available evidence, including rural communities and organizations with limited access to subscription-based journals, such as small school districts, local health departments, community-based organizations, and resource-constrained nonprofits. When dissemination is constrained, gaps in access to high-quality information widen, and the benefits of federally funded research are less likely to reach the populations who could benefit most.

At a broader level, restricting publication undermines transparency and weakens the infrastructure that supports evidence-based decision-making. The value of federal research funding depends not only on generating new knowledge, but on ensuring that knowledge is rigorously vetted by qualified experts, openly shared, and translated into action. Maintaining the allowability of publication costs under §200.461 is therefore essential to ensuring that federally funded research fulfills its intended purpose: to inform decisions, strengthen prevention efforts, and improve the health and well-being of people across the United States.

SPR Recommendations to OMB

For the reasons outlined in the responses above, the Society for Prevention Research (SPR) offers the following recommendations in response to the OMB Proposed Uniform Guidance revisions issued on May 29, 2026:

- 1. § 200.202 – Programs must align with administration priorities:** Ensure that program design remains anchored in statutory purpose and long-term public needs. Avoid requirements that tie research agendas too closely to shifting administration priorities, which can disrupt continuity and reduce the cumulative value of federally funded research.
- 2. § 200.204 – Notices of Funding Opportunities:** Retain current transparency practices and avoid imposing additional procedural requirements where systems already provide clear public notice. Allow agencies flexibility to efficiently manage funding announcements, particularly for time-sensitive or targeted initiatives.

3. **§ 200.205 – Political appointee review of grants:** Maintain the primacy of independent, expert scientific peer review in funding decisions. Limit additional review to clearly defined compliance checks and avoid introducing discretionary authority that could override merit-based scientific evaluation.
4. **§ 200.218 – Prohibition of using Federal awards to promote or support theories of disparate-impact liability:** Clarify that standard research and evaluation practices may continue to assess differences in outcomes across populations and settings, regardless of legal framing. Ensure that researchers can examine real-world variation to inform effective program design and resource allocation, consistent with recent federal priorities emphasizing solutions-oriented research.
5. **§ 200.220 – Foreign collaboration prohibition:** Replace the broad prohibition with a targeted, risk-based framework that addresses specifically defined national security concerns while preserving the ability to engage in legitimate international scientific collaboration critical to innovation and U.S. competitiveness.
6. **§ 200.300 – DEI and gender ideology prohibitions:** Retain existing protections against unlawful discrimination while ensuring that federally funded research can examine variation in outcomes across populations and contexts to maximize the return on taxpayer investment. Avoid restrictions that would limit the ability to generate actionable, decision-relevant, and solutions-focused evidence.
7. **§ 200.340 – Grant termination:** Require consistent and transparent review processes prior to discretionary termination or suspension of awards. Preserve stability for multi-year research projects to ensure completion and maximize the return on public investments. Ensure that the reasons for terminating grant funding are clearly communicated to grantees in a timely manner and that a transparent appeals process is in place.
8. **§ 200.432 – Conference attendance pre-approval:** Maintain flexibility for conference attendance as an allowable expense without requiring advance approval at the time of award. Ensure agencies can support evolving dissemination and engagement needs without introducing administrative barriers that limit participation, knowledge exchange, and the timely application of research in programs, policies, and practice.
9. **§ 200.450 – Public communications and issue advocacy prohibition:** Clarify the distinction between prohibited lobbying activities and the routine, evidence-based communication of research findings. Ensure that federally funded researchers can share results with policymakers, practitioners, and the public to support evidence-informed decision-making and maximize the public benefit of federal research investments.
10. **§ 200.454 – Memberships, subscriptions, and professional activity costs:** Continue to permit reasonable costs for professional memberships, journal subscriptions, and participation in scientific organizations as allowable expenses under federal awards. These activities are essential to maintaining scientific rigor, collaboration, access to current evidence, and professional standards in federally funded research.
11. **§ 200.461 – Publication costs:** Preserve the allowability of reasonable publication costs, including open-access fees. These costs are essential to ensuring that federally

funded research is disseminated in a timely and accessible manner, supporting transparency, evidence use, and the translation of findings into practice and policy. Maintaining their allowability is also necessary to ensure compliance with federal public-access expectations and requirements.

Conclusion

Collectively, the proposed Federal Financial Assistance Rule (Docket OMB-2026-0034; Federal Register Number 2026-10817) would reduce the effectiveness and practical utility of prevention science by constraining the methods, partnerships, and processes needed to generate high-quality evidence. The changes in regulations would weaken the return on public investments in research by introducing uncertainty, limiting dissemination, and reducing the ability to target programs effectively. Over time, this could lead to less efficient use of taxpayer dollars, as decisions are made using a more limited evidence base and resources are directed toward approaches with uncertain effectiveness or that require costly revisions after implementation. These changes also risk widening gaps in health, education, and economic outcomes by limiting the ability to identify and address variation in how programs perform across different communities and settings. Rather than reducing inefficiency, the combined effect of these provisions may increase fragmentation, duplication, and missed opportunities for effective prevention, ultimately undermining the goal of ensuring that federal investments deliver consistent, measurable benefits to the American public.

For these reasons, ***SPR respectfully urges OMB to withdraw these proposed provisions: § 200.202, § 200.204, § 200.205, § 200.218, § 200.220, § 200.300, § 200.340, § 200.432, §200.450, § 200.454, and § 200.461.*** As outlined above, SPR has provided a set of targeted recommendations that preserve accountability and transparency while supporting the conditions necessary for rigorous research that informs policy, program, and practice decisions. SPR's recommendations are intended to help ensure that the United States remains a global leader in scientific integrity, innovation, and the effective use of evidence to promote the health and well-being of individuals, families, and communities nationwide.

Respectfully,

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