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July 13, 2026

Russell Vought
Director
Office of Management and Budget
725 17th Street, Northwest
Room 252
Washington, DC 20503

RE: OMB-2026-034, "Regulation for Federal Financial Assistance"

Director Vought:

Thank you for the opportunity to provide comments on "Regulation for Federal Financial Assistance." As the Office of Management and Budget (OMB) considers changes to the federal award process, we believe it is important to take the broader stakeholder community into account. We are concerned about the short- and long-term negative impacts the Proposed Rule could have on scientific research and generating new investigators in the field. We strongly urge OMB to reconsider many of its proposed changes to the federal grantmaking regulatory scheme, including allowing agencies to terminate discretionary federal grants at will, limiting the use of federal funds for conferences and publications, multi-year research grants, requiring political appointees to review grant awards, and implementing the Executive Orders (EOs) related to DEI initiatives for federal grant initiatives.

The Research Society on Alcohol (RSA), known until 2023 as the Research Society on Alcoholism, was established in 1976. The mission of RSA is to provide a forum for communication of scientific discoveries, to attract and support career development for the next generation of alcohol researchers, and to disseminate scientific knowledge regarding alcohol use and alcohol-related health problems.

Alcohol continues to be a serious public health issue and a leading cause of death and disability in the United States. The consequences of alcohol misuse and alcohol use disorder on the general health and well-being of our citizens are devastating. Continued study of the impacts of alcohol use and risk for numerous diseases, like cancer and dementia, is critical to develop new interventions for Americans. Federal funding that supports this scientific research is necessary for public health. Any changes to these vital federal supports should be made thoughtfully, with consideration of both the immediate and long-term impacts.

RSA is troubled by several provisions of the Proposed Rule which each threaten the integrity and stability of scientific research. Though we do not disagree that



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transparency, accountability, and oversight are important, these measures should be taken carefully and be informed by the actual grantee experience. We are deeply concerned that these proposed changes will have a chilling effect on research and delay new public health tools for prevention, interventions for those struggling with excessive alcohol use, and treatments. This chilling effect will not only impact research being performed today but also the pipeline of future research as institutions struggle to hire and retain investigators, plan longitudinal studies, and navigate a convoluted regulatory landscape. Below are further details on particular areas of concern for RSA members.

200.340-200.343 -- Termination Authority

Under the proposed changes to 200.340-200.343, federal agencies would have new discretionary authority to terminate federal grants at will when it is determined that a project is no longer in the interest of the federal agency or aligned with federal priorities. Long-term scientific research requires stability and certainty in order to make the necessary investments in the infrastructure and personnel to perform that work. We recognize and understand that the federal government must be good stewards of taxpayer dollars. However, terminating a grant for arbitrary reasons can halt vital projects that may have significant funds already invested, depriving the public of valuable research findings and wasting the resources that were already allocated to that project. Projects that are terminated are unlikely to be able to provide meaningful results based on partially completed work. The nature of scientific discovery means it is not always possible to predict how one study may further scientific knowledge and inspire new pathways of research. Further, injecting chaos into the grant retention process will deter students and young researchers from joining the field, which will ultimately deprive us of senior investigators in alcohol research.

Terminating grants spontaneously also contradicts the purported goals of the Proposed Rule. The proposal claims that the amendments will reduce the recipient's burden. Pulling funding mid-project does the opposite. In fact, recipients are expected to mitigate their own post-termination costs if an agency chooses to terminate the grant. That is true even if a recipient was entirely compliant with the conditions of the grant and with federal law. This also seems to run counter to the stated goal of transparency, as funding can be revoked at any time without warning.

200.205 - Federal Agency Review of Merit of Proposals

The Proposed Rule formalizes the authority of political appointees to review the merits of all funding proposals and rewards. We understand that priorities often shift within federal agencies, as with any leadership change. However, reviewing grant notices and selecting grant recipients is a task typically left to a committee of experts in

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the field. These experts have dedicated their lives to understanding the science behind these proposals. They are best situated to evaluate their merits and determine which should receive federal funding. Requiring senior political appointees to approve projects adds an unnecessary step to the decision-making process that slows the pace of awards and stifles scientific progress.

The new requirement for political appointees to review grant awards also contradicts the purpose of the Proposed Rule. Instead of reducing recipient burden, political appointee approval adds an extra layer that slows down the award process, something grantees have experienced over the last year. It also unnecessarily politicizes scientific research and erodes public trust in federally funded research.

The new requirement will also increase uncertainty as priorities could shift with each new administration. Swings in priorities with each change in administration, or even within an administration, make it very challenging for researchers to understand where they should make investments and the types of proposals that are likely to be funded. An administration's priorities may influence the development of research priorities, but they should not be the deciding factor in research.

This is why many science-focused agencies have procedures in place to reconsider their research priorities. For example, the 21st Century Cures Act requires the National Institutes of Health (NIH) to develop a strategic plan at least every six years (it currently does so every five).¹ In its strategic plan, NIH reevaluates its research priorities, identifies new scientific opportunities and research gaps, and coordinates multi-institute and multi-agency collaborations.² NIH institutes also develop their own strategic plans. This process allows research priorities to be reviewed and adjusted based on the latest developments in science as well as the larger public health needs of the U.S. There is no need to add an additional layer of political appointee approval when priorities are already regularly reassessed and adjusted.

200.432 -- Conferences

RSA is concerned that the proposed changes to the requirements for the use of federal funds for conference attendance will negatively impact scientific collaboration. Under the Proposed Rule, recipients could only use award funds to attend conferences if the agency expressly allowed it in the terms and conditions of the grant and it was approved by the agency. Researchers often cannot predict which conferences they will attend months or years in advance. Further, a key aspect of scientific research is

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¹ See 42 U.S.C. § 282(m)(1); Nat'l Inst. Health, NIH-Wide Strategic Plan (June 2, 2026), <https://www.nih.gov/about-nih/nih-wide-strategic-plan>.

² See *id.* § 282(m)(2)(A)–(F).



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collaboration. Researchers often network, identify other individuals to work with, and exchange ideas and discoveries at these conferences. If researchers were forced to work in a vacuum, it would stymie and stall the scientific process. Additionally, scientific conferences provide crucial opportunities for early-stage investigators to meet others in their field outside of their institution. Those connections can inform their opportunities for graduate school, postdoctoral training, and an initial career position. This proposed change would undermine a crucial venue for early career development.

200.202 -- Program Planning and Design

Under the proposed 202.202(f), agencies would be encouraged to use multi-year awards. Multi-year research grants pose threats to the rate of scientific discovery. This approach will result in agencies funding fewer projects per year, even if research spending stays the same. Fewer projects mean fewer findings every year, depriving the public of valuable scientific discoveries that agencies did not fund. Multi-year grants also mean little for stable research funding if agencies can terminate them at their discretion.

200.300 -- Statutory and National Policy Requirements

RSA expresses its concern about the imposition of additional requirements on diversity, equity, and inclusion (DEI) policies. Grantees are already required to comply with federal anti-discrimination laws. The Proposed Rule purports to provide clear guidelines for what conduct is prohibited and points recipients towards several EOs that define what the Administration considers to be unlawful discrimination.³ In practice, though, since the EOs were enacted, it has been challenging for researchers to comply with the confusing, constantly moving goalposts. For over a year, federal agencies have given scarce guidance on how researchers can comply with these EOs or how these terms are defined. Agencies have offered lists of “banned words” for grant proposals, which researchers have reworked into grant applications to accommodate. Even so, researchers receive conflicting feedback on whether their applications pass muster. Formalizing these EOs through regulation, especially without adding any additional language guidance, would further confuse researchers and waste even more of their time and resources.

The process increases recipients’ burden by forcing them to spend time and resources redrafting grant proposals and guessing at what an agency will allow them to research. Further, the Proposed Rule does not improve oversight of federal grant funds because agencies do not have a consistent definition of compliance. Recipients cannot comply

³ See Exec. Order No. 14151, 90 FR 8339; Exec. Order No. 14173, 90 FR 8633.

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with an award's terms and conditions if even the agency does not know what compliance looks like. Finally, it is important to note that there are many well-documented disparities in health outcomes related to race, ethnicity, sex, and rurality. These rules in section 200.300 could be interpreted as making any targeted efforts to address these disparities ineligible for funding. Disallowing research to alleviate health disparities is harmful to the overall health of the nation.

Thank you for the opportunity to submit comments on the proposal and for considering our concerns. RSA strongly believes any reforms should rely on the input of experts, including career federal employees, who have a full understanding of current systems and areas for growth. RSA and other stakeholders stand ready to work with the Administration to ensure the U.S. continues to be a leader in scientific discovery. We respectfully urge you to avoid proposals that allow agencies to terminate federal research funding without due evidence or consideration of their value. We would welcome the opportunity to continue to engage with you in this process.

Kindly,

A handwritten signature in dark ink, reading 'Christopher W. Kahler'.

Christopher W. Kahler, PhD
RSA President

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