

COMMENTS OF THE
COALITION FOR ACADEMIC SCIENTIFIC COMPUTATION (CASC)

on the

Proposed Rule: Regulation for Federal Financial Assistance

Docket OMB-2026-0034 | 2 CFR Chapter I

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I. Introduction and Organizational Background

The Coalition for Academic Scientific Computation (CASC) respectfully submits these comments in response to the Office of Management and Budget’s proposed rule, “Regulation for Federal Financial Assistance” (Docket OMB-2026-0034), published in the Federal Register on May 29, 2026.

CASC is a nonprofit membership organization representing 110 leading higher education and research institutions across the United States. Our members operate advanced research computing, data, and networking infrastructure that is foundational to U.S national scientific research and its leadership position in scientific research. CASC’s mission centers on **advocating for and advancing** the role of research computing and data in academic science and ensuring that the full range of U.S. academic institutions can participate meaningfully in the federal research enterprise.

CASC urges OMB to withdraw or substantially revise the proposed rule. As detailed below, the rule would fundamentally dismantle the merit-based, expert-driven federal grant system that has underpinned U.S. scientific leadership since World War II.

II. Summary of CASC’s Core Concerns

CASC urges OMB to carefully consider the proposed changes to the rule. CASC’s concerns span the full lifecycle of federal grant administration as restructured by this rule. We address each area in turn.

III. 200.205—Federal Agency Review of Merit of Proposals

Section 200.205 of the proposed rule requires senior political appointees to conduct a “pre-issuance review” of every discretionary grant and explicitly prohibits them from deferring to peer review recommendations. The proposed change to the rule further requires that awards “demonstrably advance the President’s policy priorities.”

CASC suggests that the proposed change be clarified as follows:

- Remove reference to the executive order, because the legal stature and longevity of executive orders is much lower than those of Federal Acquisition Rules (FAR).
- Strengthen and broaden the requirement to review the proposed to align with the priorities of the United States as expressed by the elected administration embodied in

the President, the Senate, and House. Replace “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.” with “These principles include ensuring that discretionary awards advance the United States’ policy priorities, prohibit the use of funds for discriminatory or otherwise impermissible purposes, and emphasize ensuring compliance with applicable law.”

- The proposed rule references “Gold Standard Science” — tied to Executive Order 14303 of May 23, 2025 — as a compliance benchmark for grant awards, without providing a concrete or measurable definition. Institutions are expected to demonstrate compliance with a standard that is never defined in the regulatory text. CASC urges OMB to either define “Gold Standard Science” in concrete, measurable, and scientifically grounded terms, or to remove the requirement entirely.

V. CASC urges OMB to either define “Gold Standard Science” in concrete, measurable, and scientifically grounded terms, or to remove the requirement entirely.

Section 200.340 codifies broad authority to terminate active, multi-year grants at any time on the basis that they are “inconsistent with program goals or agency priorities,” without the requirement of any finding of noncompliance, fraud, or scientific deficiency. Research activities need to be managed like investment strategies, not like consumer product delivery where products are taken off the market when sales no longer justify the cost of producing and stocking the product.

CASC’s member institutions operate research computing infrastructure — clusters, storage systems, and networks — to support the long-term strategy of institutions, states, and the Nation. Abrupt termination of active awards threatens not only the individual research projects but the institutional capacity to sustain shared infrastructure, causing wide disruption and waste. Researchers hire staff, enroll human subjects, make capital commitments, and structure multi-year programs around the reasonable expectation that a funded award will run its course.

The rule’s analogy to the “termination for convenience” clause used in federal contracts is inapt. Grants are not contracts for services; they are instruments of public investment in scientific discovery.

CASC suggests to amend the proposed rule change to require that each Notice of Funding Opportunity (NOFO, Section 200.204) spells out the U.S. Government priorities with an explicit time horizon of at least 3 years of when the priority is expected to remain relevant and the U.S. Government commits to sustain that priority as a priority. That will allow strategic planning by everyone involved in the grant funding process.

VI. 200.432—Conferences; 200.461—Publication and Printing Costs; 200.454—Memberships, Subscriptions, and Professional Activity Costs

The proposed rule makes conference attendance allowable only with express agency pre-approval written into the award at the time it is made (§200.432) and makes journal publication costs — including open access fees and article processing charges — presumptively unallowable (§200.461). Professional society memberships require prior written approval and must be deemed “necessary” to the award (§200.454), and journal subscriptions are made categorically unallowable.

These provisions strike at the basic infrastructure of scientific communication and professional community. For CASC members and the research computing community more broadly:

- Conferences are where researchers present findings, receive peer critique, and build the collaborations that produce the next generation of proposals;
- Publication in peer-reviewed journals is the mechanism by which federally funded results are validated, disseminated, and built upon;
- Professional society memberships and journal access are foundational tools of scientific practice, not discretionary overhead; and
- Making publication costs unallowable directly conflicts with longstanding federal open access mandates, including the 2022 OSTP memorandum.

CASC urges OMB to retain the current standard under which reasonable conference attendance, publication, and professional membership costs are allowable as routine, necessary costs of conducting federally funded research.

VII. 200.220—Prohibition of Using Federal Funds for Covered Foreign Countries

The proposed rule broadly prohibits the use of any federal funds for bilateral or multilateral collaboration with “covered foreign countries” or affiliated entities (§200.220), and requires affirmative case-by-case justification for any international element in a federally funded R&D grant, with foreign entity participation requiring written approval from a senior political appointee (§200.202(e)).

International collaboration is not a peripheral feature of modern science — it is the norm. Research computing infrastructure, in particular, is inherently global: data standards, software ecosystems, benchmarking frameworks, and training pipelines all depend on international partnerships. CASC’s member institutions maintain active collaborations with partners in Europe, Asia, and Latin America that advance U.S. scientific capacity in fields from climate modeling and astrophysics to genomics and cybersecurity.

CASC does not dispute that legitimate national security concerns warrant scrutiny of specific foreign entities and relationships. However, the proposed rule’s sweeping restrictions — extending well beyond established national security frameworks and requiring political appointee approval for routine international partnerships — are disproportionate and will structurally disadvantage U.S. researchers relative to international peers.

VIII. Particular Harm to Under-Resourced Institutions

A central priority for CASC is extending access to research computing and data for the full range of U.S. academic institutions — including R2 universities, regional campuses, MSIs, HBCUs, tribal and community colleges. These institutions often lack the administrative infrastructure, legal resources, and political access that larger R1 universities can bring to bear in navigating a more adversarial federal grants environment.

The proposed rule would amplify existing inequities in several ways:

- Undefined compliance standards like “Gold Standard Science” will be harder to navigate for institutions without dedicated research compliance staff;
- E-Verify mandates and expanded administrative requirements impose disproportionate burdens on smaller institutions;

- Mid-award termination authority poses existential risk to institutions that have made staffing and infrastructure commitments around federal awards with limited reserves to absorb sudden funding losses; and
- Restrictions on conference attendance and professional memberships will widen the professional isolation that already disadvantages researchers at under-resourced institutions.

The proposed rule would set back by years the progress the research computing community has made in broadening participation in federally funded science.

IX. Conclusion and Requested Actions

The federal research enterprise has been the foundation of U.S. scientific and economic leadership for eight decades. It was built on the three principles that federal dollars should

- fund the best science as determined by independent experts
- through open competition, communication, and collaboration,
- with institutional autonomy protected from political interference.

CASC respectfully requests that OMB:

- Revise the rule to clarify the role of the senior appointee and the process by which award issuance is aligned with U.S. national priorities;
- Define in concrete, scientifically grounded terms the “Gold Standard Science” as a standard of scientific activity to give meaning to the compliance requirement;
- Restore the existing standard requiring a finding of noncompliance or other cause before mid-award grant termination or clearly define a time horizon during which U.S. national priorities will be considered as valid priorities;
- Retain allowability of reasonable conference attendance, publication, journal subscription, and professional membership costs; and
- Narrow international collaboration restrictions to those narrowly tailored to established national security frameworks.

CASC is prepared to work constructively with OMB and federal science agencies to develop grants management reforms that improve accountability and efficiency without sacrificing the merit-based principles that are the source of U.S. scientific strength. We welcome the opportunity to discuss these comments further.