



INTERNATIONAL UNION, UNITED AUTOMOBILE, AEROSPACE & AGRICULTURAL IMPLEMENT WORKERS OF AMERICA - UAW

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July 13, 2026

Office of Management and Budget
725 17th Street NW
Washington, DC 20503

Re: Comments in Response to Regulation for Federal Financial Assistance (OMB-2026-0034-0001)

Dear Office of Management and Budget,

On behalf of the nearly one million active and retired members of the International Union, United Automobile, Aerospace and Agricultural Implement Workers of America (UAW), we write in response to the Office of Management and Budget's (OMB) proposed rule, Regulation for Federal Financial Assistance, published May 29, 2026. We strongly oppose the proposed rule and urge that it be withdrawn.

The UAW is a large and diverse union representing workers in virtually every sector of the economy. UAW-represented workplaces include multinational corporations, small manufacturers, state and local governments, colleges and universities, museums, hospitals, and non-profit organizations. From auto, agricultural, and defense manufacturing workers to scientific researchers, higher education employees, legal services providers, and more, our members strengthen the U.S. economy, anchor U.S. leadership in scientific and biomedical research, protect public health, and sustain and improve community wellbeing every day.

The UAW has a significant interest in the rule proposed by OMB and grant-making agencies related to federal financial assistance. The UAW has in the past been a recipient of federal grants, including to support worker health and safety trainings related to hazardous exposures on the job, and may seek to apply for additional awards in the future. We also represent thousands of workers who directly receive federal grants, work on federally funded projects or for entities receiving federal grants, participate in programs funded by federal grants, and/or reside in communities that benefit from federal funding. UAW members across the country, their families, and their communities will be directly harmed by the implementation of the proposed rule.

The proposed rule, as drafted, raises substantial legal concerns. The proposed rule, among its many legal frailties, ignores certain specific statutory mandates, impinges on First Amendment rights, undermines the separation of powers, discriminates both directly and in its impact, is impermissibly vague, and violates the Paperwork Reduction Act. Furthermore, many of the proposed changes exceed the OMB's delegated authority.

While we maintain that the proposed rule is likely illegal, those issues have been addressed in other comments that have been submitted. We would like to highlight the significant harm that will be posed to UAW members, their families, and the entire working class if the proposed rule is allowed to take effect. We strongly urge you to consider the following destructive impacts of specific provisions within the proposed rule:

I) Political Control Over the Grant-Making Process Will Hurt Workers, Shatter Scientific Progress, and Damage Our Economy and National Interest [200.202, 200.204, 200.205, 200.206]

The proposed rule would exert unprecedented political control over every aspect of the grant lifecycle, ending our nation's longstanding reliance on independent expert review and seizing control of federal spending from Congress. Such a change would constitute a devastating overhaul of our grantmaking processes that will do long-term damage to working class communities, our economy, scientific progress, and public health.

- i. [200.202] Section 200.202, along with language proposed in 200.205 (discussed in further detail later) would require that all grant programs align with administration policies and priorities. While we recognize the importance of some degree of executive discretion in implementation, anchoring all federal assistance to the political whims of the executive branch to such an extent as proposed by this rule both attempts to usurp control of federal spending from Congress and could exact long-term harm on workers and the broader public. In theory, the proposed rule would enable an administration broad discretion to axe anything, from niche research topics to entire categories of projects which "do not align" with their policies and priorities regardless of scientific importance or statute. There is nothing even requiring an administration to specifically define or apply criteria to evaluate purported alignment consistently. What is to stop an administration from weaponizing this rule to, say, suddenly decide that workforce development funding or infrastructure projects in Michigan or worker safety programs in union-represented workplaces are not in line with their priorities? Systematically entrenching alignment with amorphous administrative policies and priorities into program design and review for every grant as proposed by this rule would seem to give the administration nearly unchecked power to steer federal spending, enabling political staff to functionally disregard and/or override Congressional intent, public benefit, and scientific importance.

UAW members' experience under the current administration highlights how damaging this approach can be. The UAW represents over one hundred thousand workers in higher education. Many of our members work on scientific, biomedical, or academic research projects funded by agencies like the National Institutes of Health (NIH), National Science Foundation (NSF), and others. Since January 2025, many research grants on which UAW members relied have been cancelled or otherwise disrupted based on a purported lack of alignment with the administration's priorities. When scrutinized, the applied criteria could often not be clearly identified, or were inconsistent and at times conflicting even

within the NIH alone.¹ And the projects that have been cancelled or that have gone unfunded in that time, despite rigorous scientific merit, have meant jobs lost, labs gutted, local economies disrupted, scientific progress stalled, and an American public that has lost out on an untold number of lifesaving or lifechanging breakthroughs in scientific and biomedical fields.²

Section 200.202 as proposed would also mean that programs may be completely redesigned at the start of each administration, creating an unpredictable and unsustainable whipsaw effect for many current and future applicants. Federally funded projects often exist as part of a broader ecosystem of work which is built over time. For example, the work of UAW members developing new cancer treatments builds on the foundation of years of federally funded studies across many fields including oncology, immunology, genetics, and cell biology, as well as clinical trials and training programs for generations of cancer researchers. In a world in which administrative priorities shift every four to eight years, entire fields could face unpredictable stops and starts that damage progress and render even the work that does get funded lower quality. Moreover, countless scientific breakthroughs have been made unexpectedly, and the nature of basic research is that of laying a foundation on which future scientists can build. For example, the development of GLP-1s – medications long used for diabetes treatment and now being studied as potential treatments for a wide range of other diseases – can be traced back to scientists studying insect and reptile venoms in the 1980s.³ Limiting what research can get funded at the outset to some narrow list of priorities of a given administration, likely determined without sufficient scientific expertise, could prevent unexpected downstream breakthroughs that would have had immense public benefit. We are concerned that the instability and unpredictability caused by this provision will preclude important long-term planning on the part of grantees and prevent long-term benefit from accruing to the public.

Section 200.202 also contains concerning provisions related to restricting eligibility for certain nonprofit categories and multiyear awards. By allowing agencies to restrict grant eligibility to specific nonprofit categories, the proposed rule would enable agencies to exclude a range of important organizations, including labor unions. To the extent that the provision on multiyear awards is intended to encourage agencies to forward fund multiyear awards such that all funding is allocated in the first award year, instead of allocated in tranches for each year of the award term, we have concerns about the potential impact of this provision at certain agencies. While some agencies provide multiyear awards that are forward funded, others do not and a transition to this model could be extremely

¹ Reardon, Sara. Exclusive: NIH documents reveal inconsistencies in grant terminations as agency reviews 3200 more, June 13, 2025. <https://www.science.org/content/article/exclusive-nih-documents-reveal-inconsistencies-grant-terminations-agency-reviews-3200>.

² Waldman, Annie, Asia Field, and Ashley Clarke. Science Shattered, June 12, 2025. <https://projects.propublica.org/nih-cuts-research-lost-trump/>.

³ Burdick, Alan, and Emily Anthes. 9 Federally Funded Scientific Breakthroughs That Changed Everything, May 16, 2025. <https://www.nytimes.com/2025/05/16/science/federally-funded-science-breakthroughs.html>.

damaging – as was recognized in P.L. 119-75⁴ and accompanying joint explanatory text⁵ when Congress limited the NIH’s ability to spend down their funds using multiyear awards for this fiscal year. Again, the potential harms of such a policy are evident in the experiences of UAW members over the last year and a half. In 2025, the NIH attempted to pivot away from their historic annual funding model to instead increase the use of forward funding for multiyear awards.⁶ The sudden switch had the effect of decreasing the total number of grants funded, the amount of money researchers get on average, and the time they have to conduct their research.⁷ For UAW members and the broader research community, this meant that the odds of winning a federal grant and thus being able to continue to progress their career had decreased significantly. Many UAW members are early-career scientists, who faced a drop in success rate to only 18.5% in FY25 – down from nearly 30% in FY23.⁸ The substantial decrease in total grants funded increased job insecurity for many and stripped the American public of the benefits of the wide range of research projects that were of rigorous scientific merit.

- ii. *[200.204]* Section 200.204 would allow agencies to exempt certain notices of funding opportunities (NOFOs) from public posting when doing so “would pose a risk to national security or is in the national interest of the United States.” The terms “national security” and “national interest” are broad and ill-defined, thus giving agency heads significant discretion in making decisions about which NOFOs to post publicly and which to exempt from public notice. In fact, this administration has a history of interpreting “national security” in overly broad and extremely harmful ways, including in its attempts to arbitrarily revoke the collective bargaining agreements of a million federal workers in the name of national security. We are concerned about the potential for this provision to be abused so as to unfairly preclude applicants that the administration does not like from having access to opportunities for federal funding. This provision raises serious concerns about public transparency and fairness and could provide yet another opportunity for an administration to steer federal spending to politically or personally aligned or otherwise favored applicants, regardless of merit and Congressional intent.
- iii. *[200.205]* Section 200.205 would require senior political appointees to conduct a pre-issuance review of every discretionary grant, relegating nonpartisan peer-review to merely advisory. As part of the proposed pre-issuance review, senior appointees would be directed to apply a range of vague principles, including highly subjective, imprecise

⁴ Public Law 119-75, Division B, Section 240, February 3, 2026.

<https://www.congress.gov/119/plaws/publ75/PLAW-119publ75.pdf>.

⁵ Departments of Labor, Health and Human Services, and Education, and Related Agencies Appropriations Act, 2026. https://www.appropriations.senate.gov/imo/media/doc/fy26_lhhs_jes.pdf.

⁶ Multiyear Funding of NIH Research Grants, May 26, 2026. <https://www.aamc.org/media/89991/download>.

⁷ Bhatia, Aatish, Amy Fan, Jonah Smith, and Irena Hwang. The U.S. Is Funding Fewer Grants in Every Area of Science and Medicine, December 2, 2025. <https://www.nytimes.com/interactive/2025/12/02/upshot/trump-science-funding-cuts.html>.

⁸ Agarwal, Kritika. Data Show Dramatic Slowdown in NIH Grantmaking, March 20, 2026.

<https://www.aau.edu/newsroom/leading-research-universities-report/data-show-dramatic-slowdown-nih-grantmaking>.

decisions about if the award advances the President's policy priorities, promotes or encourages initiatives that compromise public safety or promote "anti-American values," and complies with "Gold Standard Science," among others. These provisions would position political appointees as the ultimate decision-makers in the grant-making process and accord them functionally unlimited authority to accept or reject applicants for any reason.

Such unprecedented discretion granted to a small number of political staffers, who may have little to no expertise in the decisions they are entrusted to make, could open the door for significant corruption and create a highly unstable, unpredictable, and unfair system that will harm the quality of federally funded projects, the workers who carry them out, and the general public. The opportunity to direct funds to – or blacklist, whether explicitly or in practice – specific applicants for political or personal reasons at any given time is seemingly massive and ripe for abuse. For UAW members at institutions of higher education in particular, the potential for an entire research institution to be broadly excluded from funding from a particular agency based on vague and unpredictable criteria is highly concerning and would have cascading impacts beyond the individual studies that may go unfunded in that time. For example, many UAW members are currently working at research institutions while pursuing lengthy advanced degrees. They made choices about where to pursue said degree in part based on the institution's ability to qualify for federal funding to support their research and their own ability to maintain a job to support themselves while in the program. If said institution were suddenly unable to receive most or all funding, even from just one federal agency, it would have enormous economic and career impacts on those UAW members: they would lose their livelihoods, be deprived of professional development opportunities, and be unable to transfer to another institution easily or quickly.

The plethora of vague and ill-defined terms within the proposed language would also make it nearly impossible for applicants to know if they are complying with expectations when they apply. In fact, such terms could be interpreted and applied very differently across agencies and across different senior political appointees within agencies. The same political appointee could theoretically even change their own interpretations of such language over time with no justification or even warning to applicants. As is detailed later in this comment, the harms associated with funding uncertainty and instability are extremely detrimental to institutions, workers, scientific progress, and the broader public. For example, one UAW member who works in a lab dedicated to drug discovery, with a focus on inflammatory diseases and autoimmune conditions, has recounted how the politically driven funding cuts over the last year and half have forced their lab to let go of scientists and scale back on projects. That member has described how in a field like drug discovery, where the time from initial research conception to patient impact can already be quite long, such disruption and uncertainty can set the work back years and risks missing out on new classes of medicine that could be transformative for patients.

In part (d), this section relegates the nonpartisan peer review infrastructure of the executive branch, which relies on experts and scientific merit to carry out programs as authorized by Congress. The current peer review system ensures that federal funding flows to the projects of highest scientific merit, including potential benefit to society. The proposed rule contains language stating that the recommendations of peer review must be advisory and cannot be “ministerially ratified” or “routinely deferred to,” even by those political appointees who rightfully recognize the value of such expert input. By prohibiting deference to the experts while concentrating decision-making power on many grants across a wide range of topics into the hands of a small number of political appointees, the rule functionally guarantees that merit, good science, and long-term benefit will take a back seat or even almost entirely disappear from the grant-making calculus. The range of research topics and methods making up applications for even one grant, let alone the many grants noticed by an agency like the NIH or NSF in any given year, render it impossible for any one person or small handful of people – even the most acclaimed scientists of our time – to have the expertise necessary to properly evaluate each application. This is why the peer review system exists, and it has been shown to be better at identifying the most promising ideas than program officials alone and the most efficient way to “expand the scientific frontier.”⁹ Relegating peer review would be devastating for our nation’s scientific progress and leadership, as well as for the workforce upholding the entire American research enterprise.

Finally, we are concerned that Section 200.205 could dramatically slow funding decisions. By concentrating decision making on many complex grant applications in the hands of one or a few political appointees within each agency, the risk of bottlenecking the grantmaking process seems extremely high. Slowing the rate of funding decisions would exacerbate the harms described elsewhere in this comment, further disrupting or precluding federal funding from reaching important projects while increasing general uncertainty for applicants and decreasing job security for workers. In cases where political appointees approved or denied grant applicants at a rapid pace to prevent such a slowing, final decisions would almost necessarily be made in highly arbitrary ways with little rigorous analysis of the merits or the relative potential benefits of each application.

- iv. [200.206] Section 200.206 makes changes to the risk assessments of applicants for federal funding, significantly expanding the scope of the assessments. In particular, the proposed rule adds several broad and subjective provisions, including provisions related to an applicant’s “history of questionable practices” and memberships and affiliations. There seems to be significant opportunity for abuse and weaponization associated with an agency evaluating whether an applicant has a history of “questionable practices,” as proposed. We are concerned that, under these provisions, an agency could claim a study has been discredited simply because the agency disagrees with the outcomes of the study and has found one highly partisan practitioner who will support that claim. Additionally,

⁹ Peer review is essential to funding the most meritorious research, September 2, 2022.

<https://www.asbmb.org/advocacy/position-statements/peer-review-is-essential-to-funding-the-most-merit>.

“non-replicable” does not necessarily imply an unethical study – the ability of an outcome to be replicated or not is a standard part of the scientific process. Punishing an applicant in all future endeavors simply because one previous study was not replicable risks making applicants less willing to take on the type of innovative, cutting-edge science that could cure cancer or develop the next novel treatment for a rare disease. These provisions also seem to risk unfairly punishing entire institutions, and thus huge swaths of workers, for the actions of one of its staff: would one or two instances of plagiarism among university employees, of which there are often thousands, disqualify the entire institution from future grants? Many UAW members join research institutions with the expectation that they will be able to access important professional development opportunities and further their careers and their fields of study through federal funding. Disqualifying entire institutions, and thus thousands of UAW members – many of whom are early-career such that any disruption or interruption of opportunity could completely derail them – simply because of the misguided actions of a small number of colleagues, could cause significant harm.

Finally, the proposed risk assessment includes an evaluation of whether the applicant is a member of or affiliated with organizations “engaged in activities that violate Federal law, undermine public safety or national security, or advocate for the overthrow of the United States Government.” Again, such terms as “public safety” and “national security” are broad and ill-defined, highly subjective, and ripe for weaponization against organizations with which an administration disagrees or dislikes. We are highly concerned that such a provision could be weaponized against applicants affiliated with organizations that engage in first amendment activities disliked by the administration. It is not hard to imagine political appointees using such significant discretion to attempt to claim that members of a specific union or even an entire political party are suddenly “too risky” to receive federal funding or that they must face absurd, highly burdensome conditions attached to such federal funding.

Taken together, these provisions could afford the administration significant discretion to steer federal funding for political gain, use the threat of lost federal funding to control institutions, or arbitrarily punish disfavored applicants by refusing them funding. For UAW members and the broader working class, the potential for disruption, job loss, or other harm is high for members employed in grant-funded work, supported by grant-funded services, or whose local economies depend on federal investment. Unions themselves also often receive grant funding to support their workers. For example, the UAW has previously used federal grant funding to train members in industry safety, enabling workers to identify workplace hazards and to help develop plans for corrective actions.¹⁰ These types of programs have demonstrated positive outcomes for workers

¹⁰ Further details about the positive outcomes associated with UAW’s federally funded worker training programs can be found in the following sample of state profiles for Ohio, Kentucky, and North Carolina:

https://www.niehs.nih.gov/sites/default/files/careers/assets/docs/wtp_state_profile_oh_508.pdf;

https://www.niehs.nih.gov/sites/default/files/careers/assets/docs/wtp_state_profile_kentucky_508.pdf;

https://www.niehs.nih.gov/sites/default/files/careers/assets/docs/wtp_state_profile_north_carolina_508.pdf.

but could be at risk of disappearing because of the extreme politicization of federal funding proposed.

II) Mid-Award Termination and Suspension, Specific Conditions Provisions Will Recklessly Heighten Uncertainty – Threatening Jobs, Long-Term Workforce Stability, and Public Health [200.208, 200.340]

The proposed rule would significantly broaden discretionary termination and suspension authority and enable agencies to make arbitrary changes to conditions associated with awards during the period of performance, thereby heightening uncertainty and raising risks for grantees even after they have been selected for an award.

- i. [200.208] Section 200.208 would allow agencies to change award conditions throughout the period of performance based a range of factors, including those that are highly subjective, vague, or ripe for abuse such as the expanded applicant “risk assessment” (see previous comments on proposed changes to Section 200.206). While multiple of the listed examples of specific conditions are unchanged from current guidance, the changes to 200.206 and the political takeover of the grantmaking process proposed by this rule render the proposed Section 200.208 much more problematic for grantees in terms of potential uncertainty for and thus the long-term viability of a given project. For example, if an agency were able to decide to “withhold authority to proceed to the next phase until receipt of evidence of acceptable performance” based on the significantly expanded and ill-defined items for consideration under the risk assessment, such agency could functionally freeze a project indefinitely because of subjective, arbitrary, and/or political rationale.

Additionally, in the context of the subjugation of scientific merit to political appointees proposed by this rule, the concept of “evidence of acceptable performance” becomes far murkier and ripe for problematic interpretation by a political staffer intent on disrupting a given award despite its scientific merit or alignment with Congressional intent. Taken together, these changes would raise the level of uncertainty associated with winning an award, and thus the levels of risk and burden an applicant assumes when undertaking a project funded by a federal award.

- ii. [200.340] Section 200.340 would grant federal agencies significant discretion to terminate or suspend a federal grant if such action is “in the interest of the Federal agency.” The termination provisions specify that taking such action “in the interest of the Federal agency” could stem from a federal agency determination that such award “does not effectuate program goals, Federal agency priorities, or the national interest as they exist at the time of termination.” Such broad discretion functionally places no limits on an agency’s ability to terminate or suspend grants mid-award. Like the provisions in 200.208, these changes significantly raise the level of uncertainty associated with an award, and they increase the burden and risk an applicant takes on when embarking on

a federally funded study with the knowledge that they could lose their funding at any time and for any reason.

If applicants are unable to rely on the stability of the funding underlying their project, they are less likely to make investments in workers, resources, or infrastructure over the life of the grant for fear of being unable to complete the project or being stuck with an unfunded bill. Cutting corners to the bare minimum viable to carry out the grant terms will necessarily limit the potential benefit of a grant for workers, local economies, and project outcomes. While some institutions or applicants may be able to take on enough risk so as to still pursue the grant, many will not. Instead, an immeasurable number of projects and programs that could have benefited the working class – from scientific and biomedical research to discover the next lifesaving innovations to infrastructure projects to funding for community-based programs that support working families – may simply never happen. For workers depending on these projects for their economic security and career growth, the short and long-term consequences will be devastating.

Moreover, grantees who do still apply for and win federal funding will experience an unpredictable whipsaw from administration to administration, as grants considered to be in line with agency priorities in one administration become immediately at risk of termination or suspension, or grantees are suddenly considered “risky” applicants and thus subject to new conditions, in the next. The harms of such instability for applicants, the workers whose jobs rely on federal funding, and the communities that benefit from the federally funded projects and programs cannot be overstated. In many scientific and biomedical research settings, in which many UAW members work, the research is designed to take years and the investment could be lost entirely with even slight delays or disruptions in funding. For example, a clinical trial suddenly interrupted, even temporarily, because it no longer aligns with the priorities of a given administration could be devastating for patients – as has been the case in hundreds of clinical trials canceled early in this administration.¹¹ Arbitrary terminations could lead to substantial job loss and constitute a significant waste in the time, money, and resources already devoted to the project. Instability in funding mechanisms is bad for workers, bad for public health, and bad stewardship of public dollars.

Our characterization of the harms imposed by such uncertainty is not speculative: UAW members have faced these catastrophic impacts firsthand over the last year and a half as the Trump administration has illegally terminated, frozen, delayed, or otherwise disrupted thousands of federal grants representing billions of dollars in lost or disrupted funding from science agencies like NIH, NSF, and NASA.¹² Hiring in many scientific research labs has severely slowed, interrupting career progression across a generation of early-career scientists and driving some workers out of the field or even out of the country. For example, one UAW member has described

¹¹ Mole, Beth. Trump admin axed 383 active clinical trials, dumping over 74K participants, November 17, 2025. <https://arstechnica.com/health/2025/11/over-74000-people-were-kicked-out-of-clinical-trials-because-of-trump-cuts/>.

¹² Abandoning Americans to Disease: The Trump Administration’s Reckless Crusade is Harming America’s Health, June 23, 2026. <https://oversightdemocrats.house.gov/imo/media/doc/2026-06-23cogrdemspublichealthreport.pdf>.

downsizing in their lab, risking lost income and employee benefits as they are forced to shift to part-time work to avoid layoffs. Another has described witnessing how labs have become afraid to take on new students, and scientists have become less willing to take the types of risks or use the best-in-class instruments necessary for good science and potential breakthroughs because of cost and fears of future cuts. Grant terminations have impeded UAW members' abilities to progress in their PhD programs, secure a postdoctoral position, finish their postdoctoral studies, and more. In other instances, sudden termination of NIH K99/R00 awards has stalled UAW scientists who were near independence all while heightened uncertainty has chilled faculty and staff hiring at universities. The trickle-down impacts are extreme and will be felt for years to come: as one UAW member detailed, PhD students who have lost funding have had to turn to roles normally reserved for master's students and so on – only further shrinking opportunities for future scientists to enter these fields and delaying progress in making the biomedical and scientific discoveries that could save and change lives. Other UAW members have experienced job loss and economic precarity as a result of unexpected terminations.

III) New Limitations on Uses of Funds Will Jeopardize Workers' Careers, Decrease Public Transparency, and Block Innovation [200.220, 200.300, 200.432, 200.450, 200.454, 200.461]

The proposed rule would create a slew of new restrictions on previously allowable expenses relating to recipients' research. Provisions limiting international collaborations, conferences, publication costs, memberships, subscriptions, and more will slow U.S. scientific progress, undermine public transparency about the results of taxpayer-funded research, and severely disrupt and limit career progression for scientists – especially those early in their careers.

- i. [200.220] Section 200.220 would create an extremely broad ban on recipients and subrecipients using funds to collaborate with certain countries designated by statute, executive order, or federal law. The proposed rule provides for limited exceptions via statute or when an agency head determines a collaboration does not pose a national security risk and is "in the national interest of the United States." As discussed elsewhere in this comment, these terms are broad, ill-defined, and have been misused by this administration in the past. The provision affords broad discretion to an agency head or designee, who need not be an expert in the specific fields or topics necessary to make an informed decision about whether a grant application might reasonably yield significant public benefit in the future. Moreover, in anchoring the list of covered countries or entities to executive orders, the proposed rule seemingly grants significant power in limiting international collaborations to the political whims of each administration, regardless of actual national security risk. This provision creates the possibility for administrations to use said power for unrelated aims and could create instability for grantees across administration.

The American public broadly and UAW members specifically have long benefitted from certain international collaborations, many of which have contributed to significant advancements in scientific and biomedical research and discovery. According to a recent

analysis, over 30% of NIH papers published in 2017 had both U.S. and non-U.S. authors.¹³ For example, UAW members at the University of Southern California and other institutions have NIH funding to participate in the ENIGMA project, a global brain mapping and genetics project to identify genes and environmental factors that affect the brain, protect against mental illness, and promote healthy aging. Scientific studies like this often rely on international data, expertise, and systems. Such tight restrictions undermine the long-standing importance of international collaborations to advance innovation and could harm the career development of workers relying on some level of international collaboration to advance their fields and build their professional experience.

- ii. [200.300] Section 200.300 would, among other things, ban the use of federal funds to “fund, promote, encourage, subsidize, or facilitate” “diversity, equity, and inclusion” (DEI) policies and gender ideology as defined in Executive Order 14168. As detailed in the ongoing lawsuit *APHA v. NIH*, the National Institutes of Health (NIH) has already abruptly halted and cancelled hundreds of research projects related to gender identity and DEI.¹⁴ These terms, along with the rationale that a given grant “no longer effectuates agency priorities,” have been ill-defined and over-applied. As one unnamed NIH official explained, the administration did not provide a clear definition of DEI and instead, it is as if “someone had performed a Ctrl+F search for certain terms.”¹⁵ Many research projects that focus on topics that have been deemed “DEI” by this administration are critical to protecting national health security and ensuring that key interventions reach all Americans.¹⁶ Moreover, this administration’s attempts to defund anything related to “DEI” have led to the cancellation of important grants at times for completely unrelated reasons. For example, funding supporting UAW members studying the cause of Lymphangioleiomyomatosis, a progressive lung disease, was terminated in 2025. According to public NIH data, this grant was terminated due to the words “expression” and “trans” in the project summary.¹⁷ Examination of the summary reveals that “expression” was used here to describe the pattern of gene expression that may cause this disease and “trans” was matched to parts of common biological terms, here “transient” and “transcription.” The administration’s actions in this space have caused significant harm to UAW members who lost their existing or anticipated funding, disrupting career progression, jeopardizing economic security, and blocking scientific progress [see comments on Section 200.340].

¹³ Grubbs, Joshua, Roger Glass, and Peter Kilmarx. Coauthor Country Affiliations in International Collaborative Research Funded by the US National Institutes of Health, 2009 to 2017, November 22, 2019.

<https://jamanetwork.com/journals/jamanetworkopen/fullarticle/2755864>.

¹⁴ *APHA v NIH* Complaint, April 2, 2025. <https://www.aclu.org/documents/apha-v-nih-complaint>.

¹⁵ Exhibit 6 (Katherine J. Wu, The NIH's Grant Terminations Are 'Utter and Complete Chaos'), April 25, 2025.

[https://www.aclu.org/cases/apha-v-nih?document=Exhibit-6-\(Katherine-J-Wu-The-NIHs-Grant-Terminations-Are-Utter-and-Complete-Chaos\)](https://www.aclu.org/cases/apha-v-nih?document=Exhibit-6-(Katherine-J-Wu-The-NIHs-Grant-Terminations-Are-Utter-and-Complete-Chaos)).

¹⁶ Rashid, Mariam, and Perry N. Halkitis. How Federal Attacks on Diversity and Inclusion Policies Have Dismantled Public Health Infrastructure and Threaten National Health Security, June 1, 2026.

<https://www.americanprogress.org/article/how-federal-attacks-on-diversity-and-inclusion-policies-have-dismantled-public-health-infrastructure-and-threaten-national-health-security/>.

¹⁷ Grant Witness. <https://grant-witness.us>.

- iii. [200.432] Section 400.432 would prevent recipients from using federal funding to attend or take part in conferences unless specifically outlined in the award or authorized by the agency. Research timelines, especially for multi-year grants, can be unpredictable and researchers may be unable to anticipate when results will be ready for presentation. It is impractical to assume that researchers will know which conferences they will want to attend, or if their work will be accepted for presentation at the conference, when applying for a grant. Moreover, requiring express approval by an agency to attend each individual conference would create significant administrative burden for grantees – requiring them to spend time and resources seeking such approval for basic and routine professional activities. We are also concerned that the bureaucratic red tape proposed in this section would create additional administrative burdens for agencies, which may slow important agency grantmaking functions such as application review.

Attending conferences is a critical step in presenting research findings to the scientific community and the broader public. Especially for early-career researchers, conference presentations are also critical professional development opportunities in which workers can meet other scientists, gain exposure to important leaders in their fields, and learn about other work. Severely limiting conference attendance as proposed by this rule would undermine the public’s ability to know the results of taxpayer-funded research and would stifle the career trajectory of workers. For example, in a lawsuit over the funding freeze at Harvard, the Harvard Graduate Students Union (HGSU-UAW) reported that “eight students in the Health Policy program are supported by training grants from the Agency for Healthcare Research and Quality, which funds their tuition and living stipends while also paying for crucial professional development activities, such as conference travel and additional academic training. Without this funding, the ability of these eight students to continue their programs is put in jeopardy and will severely detract from the experience of being a doctoral student at Harvard and eliminate professional development opportunities right as they are beginning their careers.”¹⁸

- iv. [200.450] Section 200.450 would create additional restrictions on the use of funds related to issue advocacy and public messaging, among other provisions, specifically for nonprofits and institutions of higher education. Thousands of UAW workers across the country work on federally funded grants at various nonprofits and institutions of higher education. We are concerned that these provisions could create a chilling effect on recipients whose work is related to current social, political, or policy debates for fear that simply explaining results or outcomes could be considered “issue advocacy or public messaging” or otherwise attempting to influence policy debates in various settings. Recipients working on politically sensitive topics could be scared away from informing the

¹⁸ American Association of University Professors - Harvard Faculty Chapter v. United States Department Of Justice, 1:25-cv-10910, (D. Mass. May 05, 2025) ECF No. 50. <https://www.courtlistener.com/docket/69881741/50/american-association-of-university-professors-harvard-faculty-chapter-v/>.

public of their research and findings because it could be seen as violating the proposed rule and as such, their funding could be pulled at any time. Such a chilling effect would undermine public transparency related to the outcomes of federally funded research and other projects and would negatively affect the workers themselves, as preventing workers from publicly sharing results or outcomes interrupts their career progression.

- v. [200.454] Section 200.454 would change restrictions on the types of professional memberships and subscriptions that are considered allowable costs. Subscription costs have long been allowed, and there is no clear reason to reverse this change. Access to journals and other subscriptions are essential to the scientific process and to scientific progress, as they are important sites for research and learning about new findings and data from other experts.
- vi. [200.461] Section 200.461 would restrict publication and open access costs unless required by statute or approved in advance by the federal agency. Publications are the primary way in which research findings are communicated to the public. The proposed changes, along with the restriction on public relations costs proposed by 200.421, would reduce public visibility of research results. Scientific progress requires a healthy and transparent research ecosystem in which researchers and scientists can build off the results of others. Limiting timely access to those results unnecessarily slows scientific progress. The changes would also harm the careers of grant recipients, including many UAW members in academic fields, as they would no longer be allowed to showcase their work to the public. Finally, we believe these proposed changes would conflict with the 2022 Office of Science and Technology Policy (OSTP) memo “Ensuring Free, Immediate, and Equitable Access to Federally Funded Research.”¹⁹ The memo required federal agencies to ensure that federally funded research results are made freely available to the public, promoting public transparency, data sharing, and collaboration across the scientific community. Denying the use of federal funds to carry out that mandate could impose new financial burdens on grantees.

In conclusion, if allowed to take effect, the proposed rule on federal financial assistance will harm the UAW, our members, and the broader working class. The rule could cause significant job loss and cascading economic harm and will undermine America’s longstanding preeminence in academic and scientific research. Our nation’s continued recognition as the best depends on its continued prioritization of scientific merit by means of peer review. When the objective judgments of scientists are replaced by the political judgments of Presidential appointees, the entire enterprise risks losing respect and leadership on the global stage. We strongly oppose the proposed rule and urge that it be withdrawn.

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¹⁹ Nelson, Alondra. Ensuring Free, Immediate, and Equitable Access to Federally Funded Research, August 25, 2022. <https://bidenwhitehouse.archives.gov/wp-content/uploads/2022/08/08-2022-OSTP-Public-Access-Memo.pdf>.