



July 13, 2026

Mr. Russell Vought
Director
Office of Management and Budget
Executive Office of the President
725 17th Street, NW
Washington, DC 20503

Submitted via regulations.gov

Re: Proposed Rule, Federal Financial Assistance, Docket OMB-2026-0034

Dear Mr. Vought:

The Society of Environmental Toxicology and Chemistry ([SETAC](#)) is a not-for-profit, worldwide professional organization dedicated to the advancement of environmental science and management established in Washington DC in 1978 and currently headquartered there. Established at the height of the environmental crisis in the U.S., when a river was on fire from chemical pollutants, we pride ourselves on having advanced environmental health in the U.S. and worldwide.

The Society advances its mission through its programs (e.g., training and education, publications, meetings, workshops) and through the work of its employees and tireless volunteers. Our members not only conduct the research that advances the science, but SETAC science has been used for decades in the U.S. and globally to support science-informed environmental management and regulations.

In June of this year, SETAC along with many other scientific societies wrote your office and asked for a 45-day extension to the comment period for the proposed rule by the Office of Management and Budget to revise Title 2 of the Code of Federal Regulations, proposed revision of Federal Financial Assistance guidance, Docket OMB-2026-0034, published on May 29, 2026. The deadline for comments was set July 13, and having not seen an extension, SETAC is now commenting on the proposed rule.

While SETAC shares the stated goals of the proposed rule: transparency, accountability, and careful stewardship of public funds, we fear that the proposed changes would do the opposite by reshaping the funding, management, and dissemination of scientific research in the U.S. **We believe these changes would harm the U.S. science and technology enterprise, the U.S. economy and adversely affect the health of U.S. citizens. We respectfully urge OMB to withdraw or substantially revise the proposed rule, particularly the following provisions:**

§200.205 – Peer-review process

The proposed revisions weaken the long-standing principle that federal research funding decisions should be grounded in rigorous scientific peer review. While the peer-review system is not without limitations, it remains the internationally accepted gold standard for evaluating scientific merit,



technical quality, innovation, and the qualifications of investigators. Replacing or subordinating expert scientific review with political or administrative review risks funding decisions that are driven by changing policy priorities rather than scientific excellence.

Scientific challenges facing society today, including chemical safety, emerging contaminants, climate resilience, biodiversity loss, and human health, are increasingly complex and interdisciplinary. Evaluating research proposals in these fields requires subject-matter expertise that only qualified scientific peers can provide. Maintaining an independent, transparent peer-review process is essential to preserving public trust in federally funded science and ensuring that taxpayer investments support the highest-quality research.

§200.206 – Applicant risk screening

The proposed applicant screening provisions would permit organizations to be disqualified based on organizational affiliations, without notice or an opportunity to respond or appeal. Such an approach is unrelated to the scientific merit of the proposed work and introduces uncertainty that could discourage valuable collaborations.

One of SETAC's founding principles is that the best environmental science emerges from collaboration among multiple sectors, including academia, government, industry, and nongovernmental organizations. For more than four decades, SETAC has intentionally convened balanced scientific workshops and advisory groups representing these diverse perspectives. This transparent multi-sector approach has long been a hallmark of SETAC. It was through SETAC's uniquely multisector scientific community that many of the foundational concepts of modern ecological risk assessment were developed, debated, refined, and ultimately adopted into regulatory practice. American scientists, including many from federal agencies as well as state environmental agencies, worked alongside academic researchers and industry scientists within SETAC to build the scientific framework that underpins today's approaches to [environmental risk assessment](#). Through these collaborations, SETAC members have produced influential scientific consensus documents that have informed environmental risk assessment, chemical management, and water quality policies in the United States and around the world. These policies help protect human health and ecosystems, thus promoting fiscally responsible decision-making through proactive, science-based prevention and management strategies. Scientific progress depends on bringing together researchers with different expertise and perspectives. Organizational affiliation alone should not be viewed as an indicator of bias or risk. Rather than discouraging cross-sector collaboration, federal policy should continue to encourage the broad participation that has historically strengthened U.S. scientific leadership.

§200.220 – International collaboration

Scientific discovery is inherently global. The proposed restrictions on international collaboration would reduce opportunities for U.S. researchers to participate in international scientific partnerships that accelerate innovation, improve scientific quality, and enhance the nation's competitiveness.

SETAC was founded in Washington, D.C. but has grown into a global scientific society because environmental challenges do not respect national boundaries. Pollution, chemical exposures,



biodiversity loss, and ecosystem degradation are shared challenges that require international scientific cooperation.

Many scientific advances pioneered by U.S. researchers have achieved their greatest impact through international collaboration. One example is the Adverse Outcome Pathways (AOP) framework, originally advanced by U.S. EPA scientists and SETAC members, which has since become an internationally recognized framework for advancing chemical safety assessment and reducing reliance on animal testing. Its continued development has depended on sustained collaboration among researchers, regulators, and institutions across multiple countries.

Restricting international partnerships would isolate U.S. scientists from the global exchange of knowledge, ultimately limiting scientific progress and reducing the nation's ability to lead in emerging areas of environmental and biomedical research.

§200.340 – Termination for convenience

Allowing federal agencies to terminate active research awards based solely on changing agency priorities, without cause, undermines the stability necessary for scientific research and represents an inefficient use of public resources.

Many of the most important scientific discoveries require years of sustained investigation before producing meaningful results. Abrupt termination of ongoing research disrupts data collection, interrupts training of students and early-career scientists, wastes prior federal investments, and delays scientific advances that could benefit society.

SETAC's experience in environmental science illustrates the importance of sustained research. History has repeatedly shown that inadequate long-term scientific understanding of chemicals can lead to costly environmental and public health consequences. The ongoing challenges associated with per- and polyfluoroalkyl substances (PFAS) demonstrate the substantial societal costs that arise when scientific knowledge develops only after widespread environmental chemical release. Continued, uninterrupted research is essential to identifying emerging risks early, improving regulatory decision-making, and preventing future environmental and public health impacts.

§200.432 – Conference costs

Scientific conferences are an essential component of the research ecosystem. Requiring conference attendance to be pre-approved and explicitly included in award terms at the time of issuance would significantly reduce researchers' flexibility to respond to new scientific developments and emerging opportunities.

Conferences provide opportunities for investigators to present preliminary findings, receive expert feedback before publication, identify methodological weaknesses, establish collaborations, and accelerate the translation of research into practice. These exchanges often improve the quality and rigor of the resulting scientific publications.



Conferences also play a critical role in developing the next generation of scientists. Students and early-career researchers gain mentorship, professional networking opportunities, presentation experience, and exposure to interdisciplinary perspectives that cannot be replicated through virtual communication alone.

Beyond their scientific value, conferences contribute substantially to local economies through spending on hotels, restaurants, transportation, and other services. Policies that unnecessarily discourage conference participation will have both scientific and economic consequences.

§200.454 – Memberships and subscriptions

Professional society memberships and access to scientific literature are foundational resources for conducting high-quality research. Making journal subscriptions categorically unallowable and requiring prior approval for professional society memberships would create unnecessary barriers to scientific productivity.

Researchers rely on society memberships to access the latest scientific findings, participate in technical working groups, develop professional networks, establish collaborations, receive continuing education, and contribute to the development of scientific standards and best practices. These activities strengthen both individual investigators and the broader research enterprise.

Scientific societies such as SETAC also serve as neutral conveners that facilitate collaboration across academia, government, industry, and nongovernmental organizations. Restricting participation in these communities would reduce opportunities for interdisciplinary collaboration and slow the exchange of scientific knowledge. Federal policy should recognize that reasonable costs associated with professional memberships and access to scientific literature are investments that enhance the quality, efficiency, and impact of federally funded research, rather than discretionary expenses.

§200.461 – Publication costs

The proposed changes would make article processing charges and open-access publication costs presumptively unallowable except through case-by-case agency approval. This approach conflicts with existing federal policies that require publicly funded research results to be made openly available and creates uncertainty regarding how investigators can comply with those requirements.

The dissemination of scientific findings is not an optional administrative expense—it is a fundamental component of the research enterprise. Scientific progress depends on researchers being able to publish, scrutinize, reproduce, and build upon one another's work.

As the publisher of two internationally recognized peer-reviewed scientific journals, SETAC understands both the costs associated with high-quality scholarly publishing and the importance of broad public access to scientific information. Creating barriers to publication or open access will slow scientific communication, reduce the visibility and impact of federally funded research, and ultimately diminish the return on federal investment in science.



Closing

In closing, we maintain that federal investment in science, particularly applied, interdisciplinary, and transdisciplinary science such as environmental science, is essential to public health and economic growth. Federal support for scientific research should be free of political bias to ensure that decision-makers have access to the best scientific information. We strongly support the principles of scientific peer-review, international collaboration, and the advancement and dissemination of knowledge through scientific societies, such as SETAC. These mechanisms foster innovation, strengthen scientific rigor, facilitate collaboration across sectors and disciplines, and accelerate the translation of research into effective policy and practice.

We are concerned that the proposed revisions would reverse decades of successful science policy and impeded the collaborative research ecosystem that has contributed substantially to U.S. scientific leadership and competitiveness. The U.S. has long been a global leader in scientific innovation because it has fostered open inquiry, rigorous peer review, international collaboration, and robust public investment in research. Weakening these foundations would diminish the nation's ability to address emerging environmental and public health challenges. Preserving these strengths is essential to maintaining U.S. leadership, protecting public health and the environment, and ensuring continued economic prosperity.

We therefore respectfully urge OMB to withdraw the proposed rule in its entirety, or, at minimum, substantially revise § 200.205, § 200.206, § 200.220, § 200.432, § 200.340, §200.454, § 200.461, and the related provisions discussed above.

Regards,

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