

Congress of the United States

Washington, DC 20515

July 13, 2026

The Honorable Russell Vought
Director
Office of Management and Budget
Washington, DC 20503

Re: Comment to Proposed Rule “Regulation for Federal Financial Assistance” (OMB-2026-0034)

Dear Director Vought,

We write to express our deep concerns regarding the Office of Management and Budget's (OMB) proposed revisions to the current guidance governing federal financial assistance. OMB's proposed rule contains more than 120 changes to the current Uniform Guidance, including revisions that risk destabilizing research innovation, cutting out international partners, and injecting partisan politics into the grant review process. Furthermore, we are concerned that the proposed changes could weaken the federal research partnerships foundational to America's global leadership in agriculture, science, and innovation.

Land-grant universities and public research institutions are exemplary stewards of taxpayer dollars, turning those investments into direct benefits for Americans farmers, ranchers, and businesses. Public research institutions deliver real results by improving harvests, strengthening food production, and helping American farmers compete and lead in global marketplaces.

The recent spread of novel animal pests and diseases exemplifies the critical value of public research institutions to a thriving American agricultural industry. In 2022, the outbreak of highly pathogenic avian influenza (HPAI) among wild birds and poultry culminated in a multistate spread of HPAI to cattle in 2024.¹ Research contributions from public land grant universities helped stop the spread of HPAI and spurred new research to prevent future outbreaks.² Now, the U.S. is facing another threat: the spread of New World screwworm. Agricultural threats do not respect borders, and the U.S. must ensure its research institutions have the flexibility to address these challenges alongside international partners.

Groundbreaking scientific discoveries have emerged from U.S. research institutions working in partnership with the international agricultural community, like developing large-scale penicillin production in a United States Department of Agriculture lab using research started abroad.³ We are concerned the proposed rule cuts out international partners, creates unnecessary red tape, and risks slowing agricultural innovation. In a global marketplace, international cooperation strengthens domestic agriculture and helps keep grocery prices lower for American consumers.

The proposed rule would create significant barriers for U.S. agricultural researchers and farmers. Provisions to expand the administration's ability to suspend or terminate active grants and require political appointees to ensure applications further partisan agendas would be deeply damaging to the research community. This

¹ World Health Organization, Disease Outbreak News, "Avian Influenza A(H5N1) – United States of America," (Apr. 9, 2024), <https://www.who.int/emergencies/disease-outbreak-news/item/2024-DON512>.

² Association of American Universities, "AAU Member Universities Lead in Confronting the Challenge of Bird Flu," (Jan. 10, 2025), <https://www.aau.edu/newsroom/leading-research-universities-report/aau-member-universities-lead-confronting-challenge>.

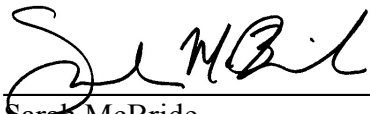
³ Elizabeth K. Johnson, University of Virginia Department of Chemistry, "The Accident that Changed the World: The Discovery of Penicillin," <https://chemistry.as.virginia.edu/node/6887>.

follows a troubling trend under the Trump Administration to limit research, close ARS laboratories, and freeze research funds.⁴ Political decisions and policy uncertainty repeatedly harm American farmers, forcing them to halt their work and saddling them with additional costs.⁵ Codifying this proposed rule would have sweeping consequences for the entire agricultural community.

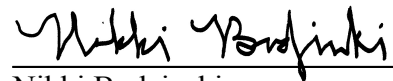
We are also concerned about the proposed rule's expansion of executive branch authority over grant-making decisions. Congress exercises its constitutional power of the purse through the appropriations process, and establishes priorities for federal investments on behalf of the American people.⁶ Expanding the powers of agencies and political appointees to terminate grants subjects the power of America's research dollars to changing political winds. Agricultural and scientific research has proven to have a high payoff, yet often take decades to yield results.⁷ Funding decisions should not be based on the shifting priorities of political appointees. Introducing this uncertainty into the grant-making process risks slowing research, discouraging participation in federal programs, and weakening the investments in the American farmer.

We therefore urge OMB to rescind the proposed rule and work with Congress, federal agencies, research institutions, and stakeholders to ensure that any changes to the Uniform Guidance strengthen accountability without undermining the long-standing federal research partnerships that support American agriculture and innovation.

Sincerely,



Sarah McBride
Member of Congress



Nikki Budzinski
Member of Congress



Mike Thompson
Member of Congress



Raja Krishnamoorthi
Member of Congress



Pablo José Hernández
Member of Congress



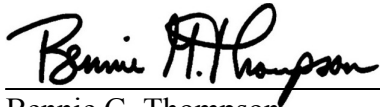
André Carson
Member of Congress

⁴ U.S. Department of Agriculture, FY 2027 Budget Summary (2026), <https://www.usda.gov/sites/default/files/documents/fy-2027-budget-summary.pdf>.

⁵ Ayurella Horn-Muller, "Farmers Are Reeling from Trump's Attacks on Agricultural Research," *Grist* (Mar. 25, 2025), <https://grist.org/food-and-agriculture/farmers-are-reeling-from-trumps-attacks-on-agricultural-research/>.

⁶ U.S. Const. art. I, § 9, cl. 7.

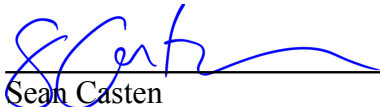
⁷ Kansas City Federal Reserve Bank, "Research Drives Long-Term Ag Productivity Gains," (May 11, 2021), <https://www.kansascityfed.org/agriculture/ag-symposium-snapshots/research-drives-productivity-gains/>.



Bennie G. Thompson
Member of Congress



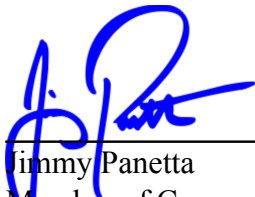
Shri Thanedar
Member of Congress



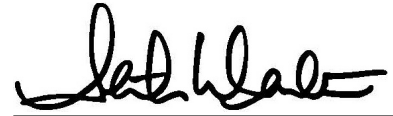
Sean Casten
Member of Congress



Betty McCollum
Member of Congress



Jimmy Panetta
Member of Congress



Seth Moulton
Member of Congress



Steve Cohen
Member of Congress



Jahana Hayes
Member of Congress



Donald S. Beyer Jr.
Member of Congress



Josh Gottheimer
Member of Congress

CC: The Honorable Brooke Rollins
Secretary
U.S. Department of Agriculture