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Meaningful Lives As We Age

July 12, 2026

Office of Management and Budget
Office of Federal Financial Management
Attn: Andrew Reisig and Joel Savary
Submitted electronically via www.regulations.gov

RE: Comments Urging Withdrawal of Proposed Revisions to 2 CFR Part 200, "Uniform Grants Regulation" — Docket No. OMB-2026-0034

Dear Mr. Reisig and Mr. Savary:

On behalf of the Gerontological Society of America (GSA), the nation's oldest and largest interdisciplinary organization devoted to the field of aging, representing more than 6,000 researchers, educators, clinicians, and policy professionals, we submit the following comments on the Office of Management and Budget's (OMB) proposed revisions to 2 CFR Part 200, the Uniform Guidance governing federal financial assistance.

GSA's vision is *Meaningful Lives as We Age*, and our mission is to cultivate excellence in interdisciplinary aging research and education to advance innovations in practice and policy. GSA members are principal investigators, co-investigators, and staff on federally funded research and training grants, primarily through the National Institutes of Health (NIH), that advance the nation's understanding of aging and improve outcomes for all Americans, as we age. We believe independent, rigorously peer-reviewed science, conducted free from political interference and insulated from the ordinary churn of federal priorities, is a public good that this rulemaking, as proposed, would substantially undermine. We recognize and share OMB's stated interest in transparency, accountability, and reduced administrative burden. However, several of the specific mechanisms proposed to achieve those goals would instead increase burden, chill legitimate scientific inquiry, and destabilize the research infrastructure underpinning the work of federal grantees like our members.

GSA joined a coalition of national organizations requesting a 45-day extension of the comment period, given the scope of this rulemaking, the most substantial revision to the Uniform Guidance since its original 2013 publication, and the compressed 45-day timeline for review and response. That request was denied. **We register our continued concern that a rule of this magnitude, reclassifying the Uniform Guidance itself from guidance to binding regulation, deserves a comment period commensurate with its stakes.**

For the reasons detailed below, GSA urges OMB to withdraw the proposed rule in its entirety. These provisions do not operate in isolation. Taken together, they insert political review into scientifically vetted funding decisions, narrow the scope of permissible research inquiry, strip away the operational flexibility that keeps research and community-based aging services running, and expose every federally funded project in our field to termination on shifting, non-cause-based grounds. This is not a rule that can be fixed with targeted edits to individual sections; its cumulative effect is to substitute political discretion for scientific and administrative judgment across the federal grant-making system. If OMB nonetheless elects to proceed with rulemaking on this subject, we set out below the specific, section-by-section changes that would be necessary, at minimum, to mitigate the harm to aging research and to all Americans who depend on it.

Our specific comments, organized by section, follow below.

[200.205] Senior Political Appointee Pre-Issuance Review of Awards

The proposed rule would require review and approval by a senior political appointee before an agency may issue a notice of award. For NIH and other science agencies, peer review by qualified scientific experts is the established, evidence-based mechanism for determining the merit of a proposed research project. Inserting a layer of political sign-off after scientific merit has already been determined introduces a channel for awards to be delayed, altered, or denied on grounds unrelated to scientific quality. For a field like gerontology, where research questions can touch on politically sensitive topics such as reproductive aging, LGBTQ+ older adults, racial health disparities, or end-of-life care, this creates a real risk that meritorious, peer-reviewed research will be slowed or blocked based on subject matter rather than scientific rigor. This risk is not specific to any single administration or point on the political spectrum: gerontological research also touches on subjects such as firearm access among older adults with cognitive decline, the role of religious practice and family structure in healthy aging, and the eldercare workforce, any of which could draw the same kind of subject-matter scrutiny under a future administration with different priorities.

We are also concerned that several of the criteria this review would apply are not defined anywhere in the proposed rule, including whether an institution demonstrates commitment to "Gold Standard Science." Without a measurable definition or objective standard, reviewers have no consistent basis for applying this criterion, and applicants have no way to know in advance what it requires of them. Undefined terms like this one do not provide the transparency and accountability OMB says it is seeking; they do the opposite, leaving award decisions open to inconsistent, unpredictable application from one reviewer or one administration to the next. We urge OMB to withdraw this provision or, at minimum, to limit any additional review to conflict-of-interest and statutory compliance screening that does not reach scientific content or subject matter, and to strike any criteria that lack a clear, measurable definition.

[200.432] Conference Attendance Costs

Scientific conferences are not a discretionary perk; they are the mechanism through which findings are vetted, replicated, and translated into practice, particularly for a field like aging research, where cross-institutional and cross-disciplinary exchange (biology, clinical medicine, social science, policy) accelerates the translation of discovery into care. GSA's own Annual Scientific Meeting is a primary venue for this exchange. New restrictions or additional approval burdens on allowable conference attendance costs would fall hardest on early-career investigators and smaller institutions with less administrative capacity to navigate added approval layers, further narrowing who can participate in the scientific enterprise. We ask OMB to retain the current framework for allowable conference costs and to avoid new categorical restrictions that do not distinguish between legitimate scientific convening and the abuses the rule appears designed to target.

[200.461] Publication and Journal Subscription Costs

Peer-reviewed publication is the mechanism by which federally funded research becomes part of the scientific record and is made available for replication, critique, and application. Restricting the allowability of publication costs and journal subscriptions as direct or indirect costs would not reduce the underlying cost of disseminating research; it would simply shift that cost onto researchers and their institutions, or suppress publication and dissemination altogether, directly undermining the transparency and accountability that OMB states as an objective of this rulemaking. Restricting journal subscription costs also affects the earliest stages of a research project, not just its dissemination: investigators rely on access to the existing literature to conduct the searches that inform a study's design, avoid duplicating prior work, and situate new findings in what is already known. We

recommend OMB retain current allowability standards for publication and subscription costs necessary to disseminate the results of federally funded research.

[200.454] Professional Membership Costs

Membership in scientific and professional societies is how researchers, clinicians, and educators in the field of aging stay current with emerging evidence, standards of practice, and ethical guidelines, and how they participate in the peer-review and mentorship functions that maintain quality in the field. GSA's membership includes public health practitioners working in state and local health departments, whose own professional development depends on the same kind of continued engagement with the field. Restricting the allowability of professional membership costs as an allowable expense on federal awards would weaken the connective tissue of the research and clinical community that the government's own investment in aging research depends on. We urge OMB to retain the current allowability of professional membership costs directly related to the purposes of the federal award.

[200.340] Expanded Termination Authority and New Temporary Suspension Authority (§ 200.340(e))

The proposed expansion of agencies' authority to terminate awards that no longer "effectuate program goals, Federal agency priorities, or the national interest," together with a new temporary suspension authority, would import a termination-for-convenience standard more familiar to procurement contracts into the grant-making context. Multi-year research and training grants require years of continuity to produce reliable results; longitudinal studies of aging, in particular, can lose most of their scientific value if interrupted mid-course. Broad, discretionary termination and suspension authority divorced from cause tied to the recipient's own performance introduces instability that will make it harder for institutions to recruit and retain research staff, harder for study participants (including older adults in longitudinal cohorts) to be protected from disruption, and harder for GSA members to plan multi-year research agendas. We recommend that any termination or suspension authority remain tied to specific, cause-based standards, with due process protections, rather than to shifting programmatic or political priorities.

[200.340] Public Health Department Cooperative Agreements

This same instability extends beyond research institutions to the state, local, and tribal health departments that keep essential public health services running in communities nationwide, including programs that support healthy aging, brain health, and adult immunization. These programs are typically structured as multi-year cooperative agreements built around multi-year strategic plans, coalition-building with community partners, and staff hired specifically to carry that work through its full term. Health departments cannot build durable public health infrastructure, and cannot make the multi-year staffing and planning commitments that infrastructure requires, if any award can be terminated mid-term whenever an agency determines termination serves its own interest, based on a brief written rationale rather than a finding tied to the recipient's performance. We recommend that OMB limit termination authority for these programs, as for research awards, to cause-based grounds tied to a recipient's own performance under the award.

[200.113] Automatic Referral of Mandatory Disclosures to the U.S. Attorney's Office

The proposed rule would require an agency's Office of Inspector General to transmit any disclosure it receives under § 200.113 credible evidence of fraud, conflict of interest, bribery, gratuity violations, or a False Claims Act violation to the U.S. Attorney's Office for the District of Columbia within ten days of receipt, regardless of where the recipient is located or where the underlying conduct occurred. Section 200.113 today functions as a self-policing mechanism: it depends on recipients and subrecipients coming forward promptly when their own compliance and research-integrity offices identify credible evidence of a problem, secure in the knowledge that

the disclosure will first be evaluated by the agency and its OIG. Converting every such disclosure into an automatic, ten-day referral to federal prosecutors without any materiality threshold or OIG assessment of severity before referral removes that intermediate layer of professional judgment and will predictably discourage the prompt, voluntary self-reporting the provision is meant to encourage. Research institutions in our field maintain research-integrity and compliance offices precisely so that issues such as billing errors on subawards or undisclosed conflicts on a grant review can be identified and corrected internally; treating every such disclosure as a prosecutorial referral, rather than allowing the OIG to exercise its ordinary judgment about which matters warrant escalation, will push institutions toward slower, more defensive internal reviews rather than the prompt disclosures OMB's own accountability objective depends on. We recommend that OMB retain OIG discretion to evaluate disclosures before any referral to the Department of Justice, consistent with existing self-disclosure practice.

[Various] Undefined and Unmeasurable Standards Used Throughout the Proposed Rule

Beyond "Gold Standard Science," several other terms used to make consequential decisions throughout the proposed rule are left undefined. Pre-issuance review and discretionary termination both turn on whether an award serves the "national interest" or "Federal agency priorities", terms not defined anywhere in the rule, so their meaning is left entirely to whoever is applying them at the time. Pre-issuance review would also require appointees to confirm that awards "demonstrably advance the President's policy priorities" and do not promote "initiatives that compromise public safety or promote anti-American values," without defining what either standard requires. And the expanded risk-assessment factors in § 200.206 would allow agencies to weigh an institution's history of "questionable practices" or affiliation with organizations engaged in "subversive activities", again, with no definition of either term.

Section 200.208 shows why this vagueness is not merely an abstract drafting concern. It would let agencies impose new specific conditions on an award during its period of performance, not only at the outset, and where the new condition is based on one of these enumerated risk factors, the agency could impose it unilaterally within 15 calendar days, without the recipient's agreement. A new § 200.208(f) would further allow agencies to impose conditions across an entire federal program based on "elevated programmatic risks," again without defining what that threshold requires. In other words, the undefined terms discussed above are not used only to decide whether to make an award; § 200.208 provides agencies with a mechanism to act on them at any point after an award is made, unilaterally and on short notice. Taken individually, each of these terms gives whoever applies it broad, unguided discretion; taken together, they govern nearly every consequential decision point in a grant's lifecycle, from initial award through modification and termination. Recipients cannot design compliant programs, and reviewers cannot apply these standards consistently, when the standards themselves are not defined. We recommend that OMB either define each of these terms with objective, measurable criteria or strike them from the rule.

[200.220] Covered Foreign Collaboration Restrictions

GSA supports appropriate safeguards against research security threats from foreign adversaries. However, the proposed restrictions on "covered foreign collaborations" are broad enough to sweep in legitimate, long-standing international scientific partnerships essential to the study of aging as a global phenomenon, comparative research on aging populations, cross-national longitudinal cohorts, and international training exchanges, among others. As drafted, the provision would require agency head approval for collaborations that pose no security risk, adding delay and uncertainty that would discourage institutions from pursuing valuable international research relationships altogether. We recommend that OMB narrow this provision to collaborations with a demonstrated nexus to research security risks, consistent with existing research security frameworks, rather than a categorical approval requirement for all cross-border collaborations.

[200.218] Prohibition on Disparate-Impact Liability

The proposed rule would prohibit the use of federal financial assistance to promote or support theories of disparate-impact liability, with only a narrow exception for internal analysis that is not applied to award activities. Disparate-impact analysis examining whether a facially neutral policy or program has an unintended, disproportionate adverse effect on a particular population, without requiring proof of discriminatory intent is a standard, well-established method in health disparities research, not a legal theory advanced for its own sake. Gerontological research regularly relies on this kind of analysis to identify, for example, whether an eligibility rule, a screening protocol, or a service-delivery model unintentionally leaves certain groups of older adults underserved. Barring federal awards from supporting this analysis would not eliminate disparate impacts; it would only prevent researchers from detecting and correcting them. We urge OMB to withdraw this provision, or at minimum to clarify that using disparate-impact analysis as a research method to identify and address unintended effects of a policy or program is categorically outside its scope.

[200.300] New National Policy Conditions on DEI and "Gender Ideology"

The proposed rule would embed prohibitions on funding, promoting, or "facilitating" DEI practices and "gender ideology," as defined in Executive Order 14168, into the terms of every federal award, with noncompliance treated as a material breach that triggers termination. For the field of aging, this provision reaches directly into legitimate scientific inquiry: research on health disparities among older adults of color, on the health and long-term-care needs of LGBTQ+ older adults, and on culturally responsive care models are established, evidence-based areas of gerontological science, not policy advocacy. The provision's vague and expansive "facilitate" standard, which could reach activities funded with non-federal dollars, will predictably chill this research well beyond its intended scope, as investigators and institutions err on the side of self-censorship to avoid the risk of termination. We urge OMB to strike this provision from the cost principles and terms and conditions framework, or, at a minimum, to clarify that peer-reviewed scientific research on health disparities, aging populations, and diverse communities is categorically outside its scope.

[200.216 / E-Verify] New E-Verify Requirement for All Recipients and Subrecipients

Extending the E-Verify requirement from federal contractors to all grant and cooperative agreement recipients and subrecipients, including universities, research institutes, nonprofit professional societies, and the state and local health departments that many GSA members work within or alongside, would impose new administrative burden squarely at odds with OMB's stated objective of reducing recipient burden. This falls hardest on smaller research institutions, community-based organizations delivering aging services under federal grants, and subrecipients several tiers removed from the prime awardee, who are least equipped to absorb new compliance systems on short notice. We recommend that any new E-Verify requirement be phased in with adequate lead time, technical assistance, and a burden threshold that exempts small nonprofit and subrecipient organizations.

[200.201–200.202] Elimination of Fixed-Amount Awards and Subawards

Fixed-amount awards are a valuable, lower-burden instrument for community-based aging services organizations, senior centers, Area Agencies on Aging, local health department outreach programs, and other direct-service subrecipients that lack the accounting infrastructure for full cost-reimbursement administration. Eliminating this instrument absent statutory authorization would shift these organizations to cost-reimbursement models that materially increase their administrative burden, again in tension with OMB's own burden-reduction objective. We recommend OMB retain fixed-amount awards and subawards as an available instrument, particularly for smaller community-based subrecipients.

[Subtitle A generally] Reclassification from "Guidance" to Binding "Uniform Grants Regulation"

We understand the administrative logic of OMB's proposal to reclassify 2 CFR Subtitle A as a binding regulation with direct, government-wide effect, eliminating the need for agency-by-agency adoption of future amendments. However, this structural change also means that future substantive changes to the rules governing federal research funding could take effect government-wide without the individualized notice-and-comment opportunity that agency-level rulemaking currently affords stakeholders in specific fields such as aging research. We ask that OMB commit to preserving meaningful, sector-specific notice-and-comment opportunity for future substantive amendments made under this reclassified authority, and to providing adequate lead time, well beyond the 45 days provided here, for rulemakings of comparable scope.

[Effective Date] Proposed October 1, 2026 Effective Date

OMB's own preamble states that comments are due on or before July 13, 2026, 45 days after publication, and that late comments will be considered "only to the extent practicable." OMB selected October 1, 2026 as the effective date specifically to ensure that "only a single set of government-wide requirements apply to Federal awards" made in fiscal year 2027. Taken together, these dates leave affected organizations roughly ten weeks between the close of comment and the proposed effective date, with no stated transition period for multi-year awards already underway. Given the scope of the changes proposed, touching cost principles, award instruments, termination authority, and new compliance regimes such as E-Verify, this timeline does not allow recipient institutions adequate time to review a rule of this magnitude, let alone update policies, retrain staff, and build compliance infrastructure before it takes effect. We recommend a minimum 180-day implementation period following publication of any final rule, with a longer transition period for provisions requiring new compliance systems (e.g., E-Verify).

Conclusion

GSA appreciates OMB's attention to the legitimate goals of transparency, accountability, and burden reduction in federal grant-making, but the proposed rule does not serve those goals as drafted. It substitutes political discretion for scientific and administrative judgment throughout the award lifecycle. GSA urges OMB to withdraw the proposed rule. Should OMB instead proceed to a final rule, we urge OMB to adopt the section-by-section changes identified above as a floor, not a ceiling, and to ensure that, as we age, Americans continue to benefit from the rigorous, independent research that the field of aging produces. We would welcome the opportunity to discuss these comments further and to serve as a resource to OMB as this rulemaking proceeds.

Should you have any questions or need additional information, please contact Patricia M. D'Antonio, Vice President, Policy & Professional Affairs, at pdantonio@geron.org.

Thank you for your consideration.

Respectfully submitted,

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