American College of Radiology™

July 13, 2026

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

Re: (Docket ID: OMB-2026-0034) *Regulation for Federal Financial Assistance*

The American College of Radiology (ACR) – a professional association representing more than 40,000 physicians practicing diagnostic radiology, interventional radiology, radiation oncology, and nuclear medicine, as well as medical physicists – appreciates the opportunity to comment on the Office of Management and Budget (OMB) notice of proposed rulemaking (NPRM), *Regulation for Federal Financial Assistance* (OMB-2026-0034), published in the May 29, 2026, *Federal Register*. The NPRM would revise the Uniform Guidance at 2 CFR Part 200 in a manner intended to substantially change management of federal financial assistance, such as grants and cooperative agreements.

General Comments

ACR staunchly advocates for federally supported research that advances innovation in patient care. The national research infrastructure, which includes agencies such as the National Institutes of Health (NIH), the Advanced Research Projects Agency for Health, the U.S. Department of Defense, the National Science Foundation, the U.S. Department of Energy, and more, allows for new scientific discoveries and breakthroughs, improving the lives of patients with a wide spectrum of diseases and disorders. Many of these patients depend on diagnostic imaging, interventional radiology, radiation oncology, nuclear medicine, and radiation treatment planning tools for prevention, diagnosis, and treatment of disease.

ACR is concerned with the likely impacts on radiology and radiation oncology research of the NPRM's proposed changes to §200. If finalized, many of these proposals would fundamentally disrupt the government processes by which grants and cooperative agreements are reviewed, awarded, managed, and terminated. Oversight of research investments would be largely redirected from federal agencies with subject matter expertise to political appointees with shifting priorities. Peer review processes that help ensure objective and rigorous evaluation of proposals would be significantly weakened. Moreover, undue compliance burdens and destabilizing insecurities would be imposed on researchers, increasing uncertainty and financial risk for innovators.

Currently, the U.S. attracts the best and brightest scientists across the world. Scientists are ethically obligated to perform objective research, independent of political influence. If their ability to freely perform research is restricted as proposed, many scientists will either relocate their teams and infrastructure to other countries or terminate their work entirely. The loss of current U.S. scientific expertise, infrastructure, and international competitive advantage would

take decades to re-establish. As such, finalization could result in a chilling effect on academic research and innovation in the United States.

Specific Comments

Proposal – §200.202(f) — Program planning and design.

- OMB proposes to clarify that program goals and objectives must aim to achieve meaningful results and align with administration policies and priorities.
- The proposed §200.202(f) encourages agencies to design awards as multi-year awards when consistent with program objectives and subject to restrictions in law.

ACR Comment – ACR generally supports the proposed §200.202(f) in concept and notes that annual re-competition for previously awarded opportunities imposes unnecessary administrative burdens and costs on awardees. Additionally, potential cancellation of research projects in progress may lead to loss of research findings that would have ultimately led to improved patient care and outcomes. Multi-year awards have inherent advantages for research agencies and grantees, such as ensuring the continuity and general stability of the project. For example, ACR has extensive experience conducting clinical research trials under the National Cancer Institute's (NCI) clinical research trials network, including the last 12 years as part of ECOG-ACRIN (Eastern Cooperative Oncology Group - American College of Radiology Imaging Network) and the NRG (National Research Group). Clinical trials require an extensive amount of effort and time to select endpoints and design trials, adapt design in response to scientific peer review, enroll an adequate number of trial participants, and analyze the data. Accordingly, the National Lung Screening Trial took over 10 years from inception to completion, and the results have redefined lung cancer screening around low dose CT imaging. NCI's critical support of these multi-year projects has enabled the reliable and continuous engagement of qualified teams of researchers who can remain dedicated to a given trial and ensure its successful completion.

Proposal – §200.205, §200.205(b), §200.205(b)(3), §200.205(b)(4) — Federal agency review of merit of proposals.

- OMB proposes to establish a new pre-issuance review process under which senior appointees must review proposals selected for funding to ensure consistency with applicable law, federal agency priorities, and national interest.
- The proposal §200.205(b) mandates that all federal agencies heads must designate one or more senior appointees to conduct a pre-issuance review of all discretionary awards.
- The proposal §200.205(b)(3) states that preference for discretionary awards should be given to institutions with lower indirect cost rates.
- The proposal §200.205(b)(4) says research grants should be awarded to a mix of recipients likely to produce immediately demonstrable results and recipients with the potential for longer-term, breakthrough results.

ACR Comments – ACR opposes the proposed changes to §200.205. NIH and other biomedical research agencies have long-established funding systems that depend on rigorous expert peer review and scientific judgment to evaluate applications. By shifting a greater role in proposal review to senior administrative officials and emphasizing alignment with agency priorities, the

proposal risks undermining the independence and integrity of the merit review process. ACR is concerned that the proposal would alter the evaluation of discretionary awards to be based primarily on political alignment and reduce the weight of expertise, peer review, and scientific merit.

ACR opposes proposal §200.205(b), as it does not establish clear qualifications, potential conflicts, expertise, or subject-matter knowledge requirements for individuals conducting proposal reviews. The lack of defined standards creates the potential for decisions to override existing review processes that are grounded in scientific expertise and evidence-based assessment. Current federal research funding mechanisms rely on rigorous peer review to evaluate scientific merit, coupled with comprehensive administrative review to ensure compliance with applicable laws, regulations, and program requirements. ACR is concerned that the proposed approach could diminish the role of these established review processes and weaken confidence that funding decisions are based primarily on scientific quality, expertise, and merit. The denial of funding for highly qualified proposals, for reasons unrelated to their scientific or technical merit, potentially undermines the statutes governing these agencies.

The proposal relies on broad and undefined terms such as a *national interest*, *anti-American values*, and *public safety*. These ambiguous standards do not provide sufficient guidance to applicants or agencies. Instead, they result in uncertainty and increased likelihood of inconsistent application across different agencies and presidential administrations.

ACR is concerned that the requirement for discretionary awards to advance the President's policy priorities relies on subjective determinations by senior political appointees regarding what constitutes compliance. This approach introduces significant variability into funding decisions, regardless of the scientific rigor, merit, or potential impact of a proposal. ACR believes that clinical research funding decisions should be grounded in established scientific principles, evidence-based decision-making, and independent peer review. Furthermore, the use of the term *gold standard science* in the context of pre-award review lacks clear definition and creates the potential for subjective interpretations that could override longstanding peer-review processes. ACR urges OMB to preserve the integrity of established merit-review systems and ensure that funding decisions remain driven by scientific excellence, evidence, and expert evaluation.

ACR opposes the proposed §200.205(b)(3), as indirect cost rates alone are not an appropriate measure of an institution's capacity to successfully carry out the requirements of a federal award. This approach may serve as a disadvantage to institutions located in areas with higher operating costs, where indirect cost rates may reflect legitimate expenses associated with maintaining research facilities, regulatory compliance, specialized equipment, and other critical infrastructure. While some personnel and equipment costs may be directly charged to federal awards, the long-term maintenance of research facilities, core laboratory capabilities, regulatory compliance functions, and institutional research infrastructure relies heavily on indirect cost reimbursement. Rather than indicating inefficiency, these costs often support the robust research environments necessary to conduct high-quality scientific work. As a result, this

criterion could unfairly penalize applicants based on location and cost structure rather than scientific merit, institutional capability, and the potential impact of the proposed project.

Finally, ACR is concerned that proposed §200.205(b)(4) does not provide evidence that the suggested approach would produce better outcomes than existing merit-based review processes. The provision could inadvertently disadvantage applicants from institutions with the strongest track records, capabilities, and expertise in conducting federally funded research, while potentially favoring institutions that lack the expertise, infrastructure, or capabilities necessary to maximize the scientific value of federal awards. In clinical research, developing high-quality proposals requires extensive scientific deliberation to identify important research questions, establish rigorous study designs, and ensure that specific aims are appropriately aligned with the overall research objectives. Funding decisions should continue to prioritize scientific merit, investigator expertise, institutional capacity, and the potential impact of the research, rather than criteria that may not be directly linked to the quality or success of the proposed project.

Proposal – §200.206 — Federal agency review of risk posed by applicants.

- OMB proposes to expand the list of factors that agencies may consider when evaluating applicant risk, including financial stability, memberships, and affiliations.

ACR Comments – ACR is concerned with the proposed changes to §200.206, specifically that expanding risk evaluation factors, particularly financial stability, could be used to justify delays in award issuance or fund disbursement. ACR requests additional clarification on how financial stability is defined and assessed, including the extent to which an institution's direct and indirect cost structure will be considered in that determination. ACR also requests clarification on what factors would constitute financial instability, whether historical examples of such instability have adversely affected the administration of federal awards, and how agencies intend to evaluate these considerations in a consistent and objective manner. In addition, the proposed emphasis on financial capacity may disproportionately disadvantage smaller organizations and newer entrants that rely on timely federal funding to initiate and sustain research activities, thereby limiting opportunities and competition.

ACR is aware of real-world scenarios in which delays of multiple months to enable further evaluation have significantly burdened grantees by relying on their debt capacity, imposing an opportunity cost, causing delays in staffing for projects, and loss of critical personnel associated with financing operations in good faith.

Finally, ACR notes that the proposed inclusion of *memberships and affiliations* as risk factors lacks sufficient clarity of scope and intent. Applicants may be unable to reasonably identify or evaluate all relevant external relationships, particularly where no formal legal or organizational control exists. ACR recommends that OMB clearly define *affiliations* and establish reasonable limits on the scope of inquiry to ensure consistent and practicable implementation.

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Proposal – §200.220 — Prohibition of using federal funds for covered foreign collaborations.

- OMB proposes a new section establishing a government-wide baseline rule prohibiting recipients and subrecipients from using federal funds to support bilateral or multilateral collaborations with covered foreign countries or covered foreign entities, unless expressly authorized by statute or approved by the agency.

ACR Comment – ACR opposes the proposed §200.220 and is concerned it could negatively impact U.S. leadership and disincentivize global research collaborations and scientific exchange. For example, ACRIN and RTOG (Radiation Therapy Oncology Group) both have longstanding international collaborators. This proposal could be problematic for basic, pre-clinical, and clinical research, much of which has historically benefited from international collaborations.

Another illustration is the international collaboration between U.S. and U.K. researchers who were awarded the 2019 Nobel Prize in Physiology or Medicine for work on how cells sense and adapt to oxygen availability.[1] Their findings laid the foundation for novel cancer treatments.

If the proposed §200.220 is finalized despite opposition, ACR would request additional clarification regarding the definitions of *foreign country* and *foreign entity*, including the types of collaborations, institutions, researchers, and activities that would fall within the scope of these terms and how the provision would apply to longstanding international research partnerships.

Proposal – §200.340(a)(2), §200.340(e) — Termination and suspension.

- OMB proposes to require that all discretionary federal awards include a provision authorizing termination when an award no longer effectuates program goals, federal agency priorities, or the national interest as they exist at the time of termination.
- OMB proposes revision of §200.340(a)(2) to provide additional clarity regarding reasons for discretionary terminations of federal awards and add new provisions regarding temporary suspension of federal awards.
- The proposal §200.340(e) states that at any time the federal agency or pass-through entity may issue a written order temporarily suspending, in part or its entirety, a federal award if determined that a suspension is in the interest of the federal agency or pass-through entity.

ACR Comments – ACR is opposed to the proposed revision of §200.340(a)(2) and any scenario in which a discretionary termination of a federal award is primarily based on changing political priorities rather than scientific merit or project progress. Requiring alignment of federal awards to specific political priorities would introduce significant project funding continuity concerns as priorities often change between and during administrations. The threat of sudden termination of federal awards would create significant instability and risk for investigators, personnel, and institutions/organizations, particularly toward the end of an administration. This uncertainty would disincentivize long-term initiatives that are necessary to appropriately assess the clinical outcomes. If the proposed revision of §200.340(a)(2) is finalized despite opposition, ACR would request clarification regarding the circumstances under which termination would be considered appropriate. Establishing clear and objective standards for termination would be necessary for promoting consistent implementation and stability.

Additionally, ACR opposes the proposed §200.340(e) as the provision relies on the discretion of the *pass-through entity* without clearly defining the scope of its responsibility for ensuring subrecipient compliance. The proposal does not adequately address the practical limitations in monitoring the full range of a subrecipient's activities. The provision appears to assume that pass-through entities possess extensive knowledge of, and oversight over, all aspects of a subrecipient's operations. ACR is concerned that this ambiguity could create unrealistic compliance expectations and expand oversight responsibilities beyond what is reasonably achievable or appropriate under the pass-through entity's role. Clearer parameters are needed to ensure accountability requirements are aligned with the pass-through entity's actual authority, access to information, and ability to monitor subrecipient performance under the award.

Proposal – §200.432(b) — Conferences.

- OMB proposes to modify §200.432 to add a requirement that costs for attending conferences are allowable only if participation in the conference is expressly approved by the agency and included in the terms and conditions of the award. The revision would clarify that recipients are not authorized to use federal funds for attendance at conferences that do not serve to advance program outcomes.
- The proposed §200.432(b) further indicates that costs for conference participation are allowable only if approved by the federal agency and included in the terms and conditions of the award.

ACR Comment – ACR opposes §200.432(b) as proposed and recommends the addition of exceptions. While requiring applicants to identify anticipated conference attendance at the time of award may be reasonable in certain circumstances, the provision should also include a mechanism for timely post-award approval when new conference and presentation opportunities emerge. Research findings often develop in ways that cannot be fully anticipated during the application process, and investigators must retain sufficient flexibility to engage with the scientific community as their work progresses. Without such flexibility, the proposal could unnecessarily limit researchers' ability to disseminate results through the most relevant, highest impact scientific forums. This could reduce opportunities for collaboration, peer feedback, and engagement with key stakeholder communities. This concern is particularly acute for basic, translational, and cutting-edge research, where scientific conferences and workshops are often organized on short notice in response to emerging discoveries or rapidly evolving areas of investigation.

ACR is also concerned that the proposed requirement may impose substantial administrative burdens on grantees and federal agencies. Requiring agency review and approval for each conference attendance or presentation opportunity could create significant delays, increase administrative costs, and divert staff resources away from research. ACR urges OMB to evaluate the administrative burdens and costs that would be imposed on researchers, institutions, and federal agencies.

Proposal - § 200.455(c) Organization costs.

- OMB proposes to clarify that data costs related to integrated data systems should align with the finalized federal grants data standards as published on Grants.gov.
- The proposed revisions to §200.455(c) further direct that costs related to data and evaluation are allowable and that data costs may include direct or indirect costs associated with building integrated data systems. Data costs include (but are not limited to) the expenditures needed to gather, acquire, store, track, manage, analyze, disaggregate, secure, share, publish, or otherwise use data to administer or improve the program, such as data systems, personnel, data dashboards, cybersecurity, and related items.

ACR Comment – ACR seeks clarification on the proposed revisions of §200.455(c), particularly the scope and application of allowable data system costs. Specifically, ACR requests additional guidance on which data-related expenses may be charged as direct costs to a federal award, and which must be recovered as indirect costs. Clarification is also needed regarding any limitations, conditions, or criteria governing the allowability, allocation, and treatment of these costs. There is also a concern that if expenses are shifted from indirect to direct costs without a corresponding increase in award funding levels, a greater portion of research dollars would be diverted from scientific activities.

Proposal – §200.461(a) — Publication and printing costs.

- OMB proposes to make publication costs unallowable under federal awards unless expressly required by statute or approved in advance by the federal agency on a case-by-case basis. Journal publication costs have been a standard allowable charge to federal research grants.
- The proposed revision of §200.461(a) further stipulates publication costs are unallowable under federal awards.

ACR Comment – ACR opposes the proposed revision of §200.461(a). Peer review provides an essential mechanism for the objective evaluation of research methods, results, and conclusions and fosters scientific rigor, transparency, and informed discussion within the relevant expert community. Publication in reputable journals also ensures that federally funded research is broadly accessible to researchers, clinicians, policymakers, and other stakeholders who can apply and build upon those findings. Furthermore, publication allows investigators to appropriately acknowledge federal funding support and highlight the contributions of the sponsoring agency.

ACR is concerned that the proposed revision could impose significant administrative burdens on both researchers and federal agencies. Requiring approval for publication-related expenses could create delays in the dissemination of scientific findings and necessitate substantial additional agency oversight and review capacity. The proposal also fails to account for the increasing number of highly respected, peer-reviewed journals that require publication fees, article processing charges, or open-access fees. This proposed revision may create new barriers to publication, particularly for early-career investigators and researchers with limited institutional resources. Moreover, eliminating or restricting these costs could create a significant

disincentive for publication and reduce the visibility, impact, and dissemination of federally funded research and limit the return on the federal investment in scientific research.

ACR appreciates the OMB's consideration of these comments and recommendations. We welcome further discussion on these matters. For questions, please contact Michael Peters, ACR Senior Director, Government Affairs at mpeters@acr.org, or Katie Grady, Government Affairs Director, at kgrady@acr.org.

Sincerely,

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