



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

Submitted electronically by The Society of Family Planning via regulations.gov

July 13, 2026

Re: FR Doc. 2026-10817; Regulation for Federal Financial Assistance (OMB-2026-0034)

Dear Director Vought:

The Society of Family Planning appreciates the opportunity to provide comments on the Office of Management and Budget's (OMB) proposed regulation for Federal Financial Assistance (OMB-2026-0034). The proposed rule will have numerous harmful consequences for scientific advancements, scientific exchange, and the integrity of the federal healthcare research enterprise. It would also undermine critical public health programs, threatening people's access to evidence-informed, person-centered healthcare. Therefore, the Society strongly opposes the proposed rule and urges OMB to withdraw it.

Summary

The Society of Family Planning (the Society) is an academic society of more than 1,900 clinicians, scholars, and partners who are dedicated to just and equitable abortion and contraception informed by science. The Society works to build a diverse, equitable, inclusive, and multidisciplinary community of scholars and partners engaged in the science and medicine of abortion and contraception. The Society seeks to support the production and resourcing of research primed for impact, ensure clinical care is evidence-informed and person-centered through guidance, medical education, and other activities, and develop leaders in abortion and contraception to transform the health care system. The proposed rule is incompatible with the Society's work in myriad ways.

The impact of the proposed rule on Society members would be profound. Some members are currently funded by federal research grants; of those who are not, many work at institutions that would be impacted, destabilized, or penalized by the proposed rule. Other Society members work in public health programs that rely on federal grants,

such as Title X clinics. Given the scale of the proposed rule, its potential to upend federal investments in public health and research, and its mechanisms to stymie scientific inquiry and exchanges, its impact extends to all Society members.

The National Institutes of Health (NIH) is a critical source of funding for health-related science, including family planning. However, family planning research has historically received a disproportionately small share of NIH investment,¹ situated within a broader context of underinvestment in women's health research.² The proposed rule threatens to widen this longstanding gap.

Key concerns

The following comments are not exhaustive. While they focus on key concerns related to federal research funding, the proposed rule will have broad, harmful implications for all financial contracts administered by the federal government, including grants that invest in critical public health programs and infrastructure.

Section 200.205, Federal agency merit review of proposals

- **Political review and undefined ideological tests applied to scientific proposals.** By requiring political appointees to conduct a pre-issuance review of grant proposals and explicitly directing them not to give deference to expert peer review, the proposed rule sidelines the scientific merit of proposals, elevating instead proposals that cater to the administration's political goals. The Society works closely with scholars to strengthen exchange with the NIH, and we see firsthand the rigor, focus, and clarity that applicants invest in developing methodologically sound proposals. Officials with deep scientific and programmatic expertise, not individuals with a political directive, must be empowered to evaluate these proposals objectively, without ideological interference and vetoes.
- **Delays and administrative burden.** The Administration's actions since 2025 to impose additional departmental review on grants - previously advanced through expert peer-review during study sections and Advisory Council approval - give early indicators that at a minimum, the proposed rule will impose burdensome and disruptive layers on the grant approval process. Political appointee requests for substantive revisions after scientific review has concluded have delayed initiation of timely research, extended award timelines, and imposed significant administrative burden on agencies and grantees.

¹ Society of Family Planning; 2023. *NIH funding for family planning research*. Accessed July 13, 2026. <https://societyfp.org/wp-content/uploads/2020/05/NIH-Infographic-FINAL.pdf>

² National Academies of Sciences, Engineering, and Medicine. *A New Vision for Women's Health Research: Transformative Change at the National Institutes of Health* (2025). The National Academies Press; 2025. Accessed July 13, 2026. <https://www.nationalacademies.org/read/28586/chapter/1>

- **Institutionalizing political orders into grant review.** The Society is deeply concerned that prohibiting grant proposals deemed to violate political orders related to “DEI,” “gender ideology,” and “illegal immigration” will inhibit or halt research and programs that seek to understand and reduce inequities in healthcare access, quality, and outcomes and will destabilize an already strained public health system. Our concerns include but are not limited to:
 - Censorship based on “gender ideology” threatens to disqualify proposals with strong, robust, study design. For example, restriction of gender to binary options can lead to inappropriate participant inclusion or exclusion, misclassification, and/or inaccurate data analysis and study conclusions; thereby limiting our knowledge of how, why, and when gender and sex matter in family planning.³
 - Family planning and racism are inextricably linked.⁴ Bans on “DEI” in grant proposals will categorically exclude scientific inquiry seeking to mitigate systemic barriers to healthcare that disproportionately affect people of color, low-income individuals, and others experiencing structural oppression. This section also threatens to perpetuate past and present exclusion of scholars of color in research, erase efforts to confront the power imbalances in science, which have impeded individuals from historically and continually marginalized groups from participating as scientists, and bar methodological mechanisms such as authorship positionality necessary to account for sources of bias in research.
- **Lack of clear, objective standards for funding decisions.** The proposed rule requires, but does not define, proposals that adhere to “gold standard science,” creating an environment for arbitrary, inconsistent funding decisions that allow ideology to overrule scientific rigor. Undefined compliance standards give political appointees discretion to favor or disfavor specific research topics, inquiries, and institutions based on ideology.
- **Prioritizing politics over evidence.** The evidence base and scientific discovery should inform decisions about clinical practice, public policy, and health service delivery. By prioritizing proposals that align with the administration’s political goals, the proposed rule will result in so-called research that instead works backwards to manufacture a predetermined conclusion. This approach is incompatible with strong scientific standards and will yield results that do not

³ Moseson H, Olson I, Shuster SM, Harris MS, Foster AM, Han L, Levandowski BA. Society of Family Planning Research Practice Support: Approaching the concepts of gender and sex in family planning research. *Contraception*. 2025;141:110708. doi:10.1016/j.contraception.

⁴ Quinones N, Fuentes L, Hassan A, et al. Society of Family Planning Research Practice Support: Strategies and considerations for addressing race and racism in quantitative family planning studies. *Contraception*. 2024; 139:110534. doi:0.1016/j.contraception.2024.110534

meet the rigor, integrity, or transparency necessary to contribute to the evidence base.

Recommendation: withdraw. The final rule must explicitly preserve the independent peer-review process as the metric for scientific merit, maintain objective and clearly defined evaluation criteria, and insulate scientific inquiry from political vetoes, ideological moving targets, and censorship.

Section 200.206, Federal agency review of risk posed by applicants

- The Society is concerned that by expanding applicant "risk" assessments to include subjective measures, such as tests for "reputational risk" and organizational "affiliations," rather than concrete, objective indicators of risk, the proposed rule institutes an opaque, subjective review of applicant viewpoints. Society members hold many organizational affiliations, including Society membership, that expand their professional networks, enhance their learning, and build communities of practice. Under the proposed rule's subjective "risk" review, the affiliations that enhance researchers' skills and rigor could be arbitrarily leveraged to disqualify them as grantees.

Recommendation: withdraw. Preserve current assessments of applicants based on objective, quantifiable indicators of risk.

Section 200.218, Prohibition of using federal awards to promote or support theories of disparate-impact liability

- The proposed rule ties the hands of scientists investigating the systems that contribute to inequitable health outcomes. Evaluating "disparate impacts" is a methodology used to investigate different health outcomes across demographics. Barring inquiry that recognizes that discrimination and racism are evidence-based risk factors both weakens the integrity and rigor of scientific inquiry and will stymie scientific progress toward understanding and intervening in health inequities.

Section 200.300, Statutory and national policy requirements

- As also detailed above, prohibiting awards that "fund, promote, encourage, subsidize, or facilitate" DEI or DEIA policies and practices and "gender ideology" will inhibit or halt research and programs that seek to understand and reduce inequities in healthcare access, quality, and outcomes, further destabilizing an already strained public health system rather than improving it.
- The Society is also deeply concerned that the proposed section is so broad that it could be leveraged to penalize institutions and organizations conducting research the administration finds ideologically objectionable even when using

separate, non-federal funds, or be applied punitively to any institution or program that engages in initiatives to advance diversity, equity, and inclusion.

Recommendation: withdraw.

Section 200.340, Termination and suspension, and 200.342, opportunities to object, hearings, and appeals.

- The proposed rule permits federal agencies to justify arbitrarily terminating active grants mid-project citing inconsistencies with “agency priorities” or “national interest,” without finding of misuse of funds or noncompliance. This creates an unstable environment unconducive to a functioning research infrastructure. Scientific inquiry requires upfront and non-mitigatable investments, and these sections ensure that sustained funding will be unpredictable. This uncertainty will make it difficult to recruit staff, build research infrastructure, or pursue ambitious long-term projects. The Society is also alarmed by the ethical implications for research on human subjects, including the prospect of arbitrarily stopping or terminating an active clinical trial and abandoning participants.
- The impact on scientific exchange could also be profound, as researchers may fear that releasing or discussing preliminary findings, if they are not aligned with subjective “agency priorities,” could put the continuation of their work in jeopardy. Presenting preliminary findings, obtaining feedback, and engaging in dialogue with colleagues and communities is crucial to advancing and honing the rigor and transparency of research.
- Eliminating administrative hearing and appeal opportunities for these discretionary cancellations further threatens grant recipients and their institutions with financial risk, as multi-year scientific programs can be abruptly defunded without recourse.
- The Society has heard from members impacted by the disruption caused by HHS’s abrupt cancellations of research grants since 2025; even when reinstated, the disruption caused by uncertainty has created delays, confusion, and instability within institutions. These sections would institutionalize this confusion across agencies and programs.

Recommendation: withdraw. Preserve a process for award terminations that is based on noncompliance or fund misuse only and maintain formal recourse for researchers whose grants are terminated or suspended.

Sections 200.432 and 200.454

The proposed revisions under Sections 200.432 and 200.454 would substantially expand the scope of unallowable costs under federal awards. Subjecting conference attendance, professional society participation, and access to academic journals and publications to scrutiny and financial constraints will isolate scientists from exchange

within their professional communities, foreclose opportunities to disseminate their research and engage peer review, and limit their access to information.

- **§ 200.432.** Allowing conference expenses only if they are pre-approved on a case-by-case basis and incorporated into the award at the time of issuance is not only impractical - it impedes scientific exchange. Society members attend conferences, including the Society's Annual Meeting, to spotlight emerging research, present findings, obtain feedback, foster interdisciplinary dialogue, and highlight innovations. Scientific conferences also invest in workforce development by creating forums that support career advancement, leadership development, mentorship, and hands-on skill-building for both emerging and established professionals. Sessions at the Society's Annual Meeting are peer reviewed, grounded in the evidence base, and designed to accelerate scientific exchange.
- **§ 200.454.** Requiring preapproval of use of funds for membership in professional, civic, business, or technical organizations, requiring that they must be "necessary to fulfill the award requirements," and imposing a subjective prohibition on "issue advocacy," will further isolate grantees from peer networks, constraining scientific exchange. Society members report benefits of Society membership, including facilitating dynamic networking, professional development, and scientific exchange, and positioning them for impact in the community and the field. The proposed rule also makes the costs of subscriptions to business, professional, academic, and technical periodicals unallowable, a key source for scientific literature and knowledge that may not be covered by a grantee's institution.

Recommendation: withdraw and preserve funding for essential functions that facilitate scientific exchange, professional collaborations, and public dissemination of findings.

Section 200.450, Lobbying

- As a source for science and a community of scholars, the Society is committed to making the evidence base readily accessible and digestible, and building public understanding of the scientific process. Restricting federal funds from being used for public relations or any "issue advocacy" unrelated to the rigid statutory objectives of the award is disingenuous. This section empowers administration officials to characterize any scientific findings that are perceived to be misaligned with the administration's political goals as "issue advocacy," triggering a gag on dissemination within and outside the field. In fact, empirical evidence should inform decisions about clinical practice, public policy, and health service delivery, not be penalized and silenced because it does not subjectively align with an ideological goal. For scientific knowledge to be impactful, time and resources

must be dedicated to broadly sharing scientific knowledge in formats designed to reach the intended user of the science and accelerate the impact.

Recommendation: withdraw.

Section 200.461, Publication and Printing Costs

- OMB's assertion that publication serves the interests of individuals and institutions more than the objectives of the federal program is misguided, as peer-reviewed publication is a mechanism by which science is validated, disseminated, and leveraged for impact.
- While the Society recognizes reducing publication charges and addressing predatory publishing fees in the commercial publishing industry warrant attention, the proposed rule is overly broad and will not address the cause of the problem. Instead, categorically making publication costs unallowable shifts the financial burden of federal public-access compliance onto universities, researchers, libraries, and private philanthropy. Absorbing these costs will be especially harmful without a transition period.
- This section also contradicts NIH's existing requirement that NIH-funded research be made publicly available through PubMed.

Recommendation: OMB should withdraw and work with knowledge generators to identify workable approaches that address excessive, opaque commercial publishing fees but do not pass the cost burden onto researchers or inhibit distribution of research findings.

Section 200.477, Abortion cost principle

- The Society is deeply concerned that making unallowable "costs associated with abortion" under federal awards reinforces and significantly expands existing federal restrictions on abortion. This section could be broadly applied to grantees investigating abortion access, safety, or care models. It also threatens to make public health programs providing, referring for, or even discussing abortion care and services ineligible for federal funding. The proposed rule gives officials with political mandates latitude to penalize researchers for any affiliation with abortion care or research, even when it is entirely separate from the scope of their grant.
- Abortion is essential healthcare⁵ and intersects with issues across the spectrum of science and medicine. Instituting a ban on any research related to, or perceived to be associated with, abortion will broadly constrain scientific inquiry across the field of obstetrics and gynecology and sexual and reproductive health. In addition to the urgent need to answer both new and longstanding questions

⁵ Society of Family Planning; 2025. *Abortion is essential healthcare*. Accessed July 13, 2026. <https://societyfp.org/wp-content/uploads/2025/07/Abortion-is-essential-healthcare.pdf>

that have not been answered related to abortion care, this section will constrain inquiries seeking to improve maternal and infant health outcomes, care for people with complex healthcare needs, and health equity.

Recommendation: withdraw.

Conclusion

Science is an essential tool for advancing access to evidence-informed and person-centered healthcare. The Society is committed to building toward a future where government institutions robustly resource rigorous, objective scientific inquiry and invest in a strong, equitable public health infrastructure. The proposed rule would set us backwards and we urge you to withdraw it. Thank you.