

AAI is the nation's largest organization of immunologists and scientists in related disciplines. Below, AAI outlines multiple concerns with the proposed rule, which we urge OMB to withdraw in its entirety. AAI's full-length comments are attached.

[200.205] Establishing pre-issuance review

AAI is especially concerned with several proposed changes:

- Pre-issuance reviews. AAI believes that this is a new and unnecessary burden that will result in significant delays to the grantmaking process. Pre-issuance reviews, to the extent that they are conducted, should be led by scientists who have the expertise to assess the rigor, quality, and feasibility of each proposal. The recommendations made by expert scientists should not be discarded in favor of non-scientific judgments. Giving this vast authority to political appointees runs counter to the Administration's goal of increasing transparency.
- Ensuring proposals "demonstrably advance the President's policy priorities." Prioritizing political decisions over scientific merit will invariably erode public trust. There is also no practical way to measure whether all scientific awards advance any President's policy priorities. Any attempt to do this would be incredibly burdensome.
- Supporting Gold Standard Science. "Gold standard science" is a highly ambiguous phrase that is not defined in the proposed rule. Measuring performance through undefined or hard-to-define benchmarks would decrease consistency and predictability in grantmaking and reduce transparency.
- Giving preference to institutions with lower indirect cost (IDC) rates. Issuing awards based on IDC rates risks compromising scientific excellence if awardee institutions are not well equipped to support the proposals. It is also unclear how a judgment of "all else being equal" can be made, or trusted, without transparency and solid metrics (e.g., paylines).

[200.340] Increased authority for award terminations and suspensions

AAI is deeply concerned by several proposed changes, including:

- Expanded termination authority. The sweeping and broad nature of this proposed change would allow agencies to terminate grants at almost any time for any reason. This lack of transparency runs counter to OMB's stated goals and would create substantial uncertainty for researchers.
- Temporary suspension authority. AAI believes that this authority is both broad and vague. Suspending awards interrupts research projects and destabilizes individual labs and institutions. It also threatens clinical trials that often cannot be restarted, placing trial participants at risk and wasting taxpayer investment.
- Lack of procedural protections. AAI is concerned about the absence of an appeals process for most grant terminations. Simultaneously making federal award terminations easier while weakening the appeals process would increase uncertainty in an already destabilized scientific workforce.

[200.461] Making most publication costs unallowable



The broad dissemination of research results is a core accountability mechanism and helps ensure that the taxpayers' investment in scientific research can reach its full potential. It is a fundamental contradiction to mandate open access publication while taking away the federal resources required to publish.

[200.432] Limiting conference attendance

Scientific conferences catalyze discovery by convening experts to share data, hypotheses, strategies, and receive feedback from their peers. They allow researchers to network and form fruitful collaborations that would not organically be made in other settings.

By requiring agency approval of conference attendance years in advance in the terms and conditions of the award, the proposed rule would hamstring investigators' ability to choose the right conference at the right time to best advance their research, thereby significantly decreasing the effectiveness of federal research dollars.

[200.202(e)] Limiting international awards

This section unwisely restricts federal R&D awards to U.S. entities and vests significant power in a political appointee who may or may not have relevant scientific or agency expertise to determine when R&D awards are best given to trusted international collaborators.

[200.220] Prohibiting select foreign collaborations

Creating broad new barriers to international collaborations will increasingly isolate the U.S. from scientific progress. The U.S. should promote collaborations with innovative scientific leaders around the world who are utilizing new technologies and are on the cusp of exciting breakthroughs to ensure that the U.S. can accelerate progress and benefit from these advances.

Conclusion

AAI respectfully urges OMB to withdraw the proposed rule. Increasing transparency, accountability, and oversight are worthy goals and AAI stands ready to work with OMB and other stakeholders on alternate proposals that advance these goals and do not harm scientific progress and the broader U.S. scientific enterprise.

