

July 08, 2026

Office of Management and Budget  
Office of Federal Financial Assistance  
Executive Office of the President

RE: Proposed Rule, Regulation of Federal Financial Assistance [2 CFR Parts 200, 300, 376, and 382 RIN 0991-AC35]

The Sleep Research Society (SRS) appreciates the opportunity to provide feedback and comment on the Office of Management and Budget's (OMB) recent proposal to update *Uniform Guidance*. As a medical research community, we are deeply concerned that the current proposal could severely disrupt investigator-initiated medical research and delay scientific progress for improvements in care and the development of innovative treatment options. Given its far-reaching nature, we urge OMB to withdraw this proposal and work with Congress and the research community on a transparent, common-sense set of incremental reforms in lieu of wholesale changes with uncertain outcomes.

SRS was established in 1961 by a group of scientists who shared a common goal of fostering scientific investigations into all aspects of sleep, circadian rhythms, and sleep disorders. Since that time, SRS has grown into a professional society comprising over 1,300 researchers nationwide. From promising trainees to accomplished senior investigators, sleep and circadian research has expanded into areas such as psychology, neuroanatomy, pharmacology, cardiology, immunology, metabolism, genomics, and healthy living. The SRS recognizes the importance of educating the public about the connection between sleep, circadian rhythms, and health outcomes. The SRS promotes training and education in sleep and circadian research, public awareness, and evidence-based policy, in addition to hosting forums for the exchange of scientific knowledge pertaining to sleep and circadian rhythms.

While the current system of federal health research funding is not perfect, the overall framework has made the U.S. the world leader in biotechnology and produced breakthroughs that improve health and address disease. This is particularly true in sleep health and sleep disorders, where support from NIH and other federal entities has led to rapid scientific advancements. Below, we summarize the SRS view of provisions that would significantly disrupt ongoing and emerging medical research.

- **The current proposal shifts the regulatory framework from one of simple guidance to one of rigid regulation.** Scientific advancement can move very quickly, and such a strict set of standards may quickly become outdated and be difficult to modernize, thus hampering timely progress.
- **Certain provisions undermine basic tenets of the scientific process.** One such tenet is conducting research that fills important gaps in knowledge. A second is the use of rigorous and reproducible methods to address these scientific gaps. The current proposal—to have political appointee-enhanced merit-review, pre-issuance review, and risk assessment—would dismantle the highly successful and efficient peer-review system that has been essential to the success of American science. Current procedures optimize efficiency by

ensuring that taxpayer resources are deployed to make the greatest progress in the shortest time possible. Having political appointees make decisions on grants diminishes the role of peer-review and creates a system that could be easily abused: Political appointees could steer resources to projects based on political or personal preference, rather than what is most scientifically meritorious or most needed for the country. [Sec. 200.205]

- **Prohibitions on international collaboration would undermine medical research in numerous areas.** While the U.S. sets the standard for medical research, many international centers have specialized expertise, particularly in rare conditions and in areas of science that require very large population data sets. Collaborative work leveraging these specialized resources accelerates discovery and benefits U.S. patients and, ultimately, the U.S. healthcare system. [Sec. 200.202 and 200.220]
- **Expanded authority to terminate or suspend awards based on political priorities will have adverse unintended consequences.** Medical research is a methodical process that requires planning and execution over many years. The prospect of having projects canceled or their focus shifted creates a high-risk environment and threatens the premature termination of promising research. Many projects will become unfeasible, not because they are divisive or controversial, but only due to the complexity of their execution in an uncertain environment. [Sec. 200.340, Sec. 200.341 and Sec. 200.342]

We would also like to raise concerns about proposals that undermine scientific infrastructure and create arbitrary obstacles for the research community.

- We join with the broader community in raising concerns about new proposed requirements that **prohibit federal funds from being used to pay for article publication charges.** Researchers currently must pay these charges in order to comply with the federal government's own open access requirements. The proposed prohibition would inhibit the publication and dissemination of research findings to the public and the research community. [Sec. 200.461]
- Similarly, we are concerned with oversight and resource restrictions that make it difficult to join **professional societies and access journals.** This existing network is a pillar of scientific progress in medical research. Administrative review of all such activities will stifle scientific communication and collaboration. [Sec. 200.454]
- Relatedly, we have concerns about **limiting use of federal grant funds for conference participation** and attendance at professional meetings. Once again, this is paramount to an ecosystem that relies on collaboration and information sharing. [Sec. 200.432]

Considering the significant and sweeping proposed changes and the potential disruption to ongoing and emerging medical research, we urge you to withdraw the current proposed rule and provide further opportunities for study and deliberation, including with congressional authorizers. Please consider us a resource if you have any questions or would like any further information. Thank you for your time and for your consideration of these comments.

Sincerely,

Sleep Research Society