



Comments from agInnovation Northeast on Proposed Revisions to the Uniform Guidance

agInnovation Northeast represents the Directors of the State Agricultural Experiment Stations at the Land-grant universities of the Northeast. We submit these comments in support of, and to expand upon, the concerns raised by our national association, agInnovation, regarding the Office of Management and Budget's proposed revisions to the Uniform Guidance. We write not merely as recipients of federal funds, but as partners charged by Congress and the American public with conducting research in the public interest. That partnership carries obligations on both sides, and we ask OMB to honor them.

The Northeast's experiment stations are not a marginal piece of this enterprise. Nationally, State Agricultural Experiment Stations conduct approximately 75% of all publicly funded agricultural research performed for the public good, and every dollar invested in that work returns an estimated \$20 in economic impact. Those figures represent higher crop yields, safer food systems, stronger rural economies, more resilient forests, and healthier watersheds. They reflect the measurable public return generated by a research system that has served the nation for more than a century. Any revision to the Uniform Guidance should be judged against a simple test: does it protect or erode that return? On our reading, the proposed rule fails that test in several material respects.

Federal research succeeds because elected officials establish broad national priorities while the scientific community determines, through competitive merit review, which investigations are most likely to achieve them. The proposed revisions undermine that distinction.

The proposed rule's pre-issuance review by political appointees is only part of the problem. Equally troubling is the prospect of directly tying eligible research areas to the priorities of a current or future executive order. We reject this approach outright. Tethering research grants to shifting political directives stifles scientific discovery, politicizes scientific inquiry, and threatens U.S. research leadership. It replaces the durability of merit review with the volatility of the political calendar, guaranteeing that research priorities reset every four years or sooner regardless of scientific opportunity or public need. This is not modernization; it is the politicization of a system built to be insulated from exactly this kind of interference. OMB should state unequivocally that funding eligibility will not be determined by executive order and that merit-based peer review, not political alignment, governs the award of federal research funds.

Plant and animal breeding programs, forestry trials, soil health studies, and water research in our region are measured in decades, not budget cycles. Allowing agencies unilateral, unappealable authority to terminate awards mid-stream because priorities shifted converts every multi-year grant into a conditional one. Our institutions commit faculty lines, graduate

students, land, and unique biological and environmental assets to these projects based on the government's word that a competitively won award will be allowed to run its course. That word needs to mean something. We ask OMB to preserve a meaningful appeal process before any termination for convenience.

Pests, pathogens, and weather do not stop at the border. The region's experience with emerging plant and animal disease threats (e.g., the ongoing multinational response to the New World screwworm) demonstrates that responsible international collaboration is a security asset, not a liability. We strongly support rigorous research-security safeguards. We oppose broad restrictions that would sideline the very partnerships that let us detect and respond to threats before they reach American soil.

Making publication costs, journal access, conference participation, and professional membership dues unallowable absent case-by-case agency pre-approval does not eliminate these costs; it shifts them onto institutions already absorbing the compliance, cybersecurity, and safety infrastructure that federal awards require. Cybersecurity, export controls, research integrity programs, compliance systems, and financial oversight are not administrative luxuries; they are the mechanisms through which the federal government safeguards public investments. Preferencing applicants with lower indirect cost rates, all else equal, punishes the institutions maintaining strong research-security and compliance infrastructure, the opposite of what this rule claims to reward. If OMB wants accountability, it should fund the infrastructure that accountability requires, not defund it.

Fixed amount awards and subawards allow multi-institutional projects to move efficiently by tying payment to deliverables rather than line-item accounting. Eliminating them except where a statute expressly authorizes their use adds reporting burden without adding rigor, and it will fall hardest on the multistate, multi-institution collaborations that define Northeast agricultural research. We ask OMB to retain this flexibility as a standard, available tool not an exception requiring statutory permission.

The proposed revisions would fundamentally alter the relationship between the federal government and the institutions Congress relies upon to conduct research on behalf of the American people. They would weaken the independence of scientific inquiry, reduce the stability required for long-term research, and increase administrative burden without improving accountability. OMB should revise the proposed rule to preserve merit-based peer review, maintain due process for award termination, retain existing administrative flexibilities, and ensure that political priorities do not become the basis for scientific funding decisions.

Thank you for the means to comment. agInnovation Northeast would welcome the opportunity to discuss these recommendations further or provide additional information that may assist OMB as it finalizes the Uniform Guidance.

Respectfully submitted,

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