



Asthma and Allergy
Foundation of America



The Medical Society Consortium on
CLIMATE & HEALTH



National Association of
Pediatric Nurse PractitionersSM



July 13, 2026

Russell Vought

Director

Office of Management and Budget

Executive Office of the President

725 17th Street NW

Washington, DC 20503

Re: Comments on Proposed Revisions to Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (OMB-2026-0034)

Dear Director Vought:

The undersigned national health organizations write to offer feedback on the proposed OMB rule on federal financial assistance. Our organizations represent nurses, physicians, public health professionals, researchers and patients nationwide, and work in coalition to protect the health of people across the country. Many of our organizations are also submitting individual or other comments on this proposal, given its sweeping nature, affecting federal awards to states, local governments, Tribes, universities, hospitals, companies and nonprofit organizations. In these comments, we offer feedback on the aspects of the proposal that would impact a major priority of our organizations' collective work: ensuring people nationwide have clean air to breathe that does not cause or worsen disease. We are deeply concerned that this rule would have multiple harmful implications for efforts to reduce air pollution and protect the public from environmental health risks.

First, scientific research is a cornerstone of environmental health protection. Research on the health impacts of environmental exposures is crucial to protecting health from air

pollution, as it both informs information shared with patients, healthcare providers and communities to avoid harmful exposure and underlies regulatory measures to reduce air pollution. The U.S. Environmental Protection Agency (EPA), the National Institutes of Health's (NIH) National Institute of Environmental Health Sciences, NIH's Environmental influences on Child Health Outcomes program and others provide a crucial pathway for research that uncover information about topics such as the impacts of microplastics on children's health and new methods to reduce contamination at Superfund sites.

This proposal would create more delays in awards of federal research funding, as well as significantly more uncertainty around whether federally funded research continues. Once awarded, the proposal would add a layer of political appointee review at the agency level before funding is awarded. This step would supersede the peer-review process currently in place for research funding; peer review would instead be reduced to an advisory opinion. We are concerned that this would undermine considerations of scientific merit by experts in the field covered by the grant, and also that this additional process step would entrench delays in grant awards that would further slow the pace of research into environmental health threats.

For both existing and future grants, the proposal would also significantly increase the likelihood of grant cancellations, creating enormous uncertainty for grantees. For researchers, this uncertainty could result in years of lost progress. This could also undermine the pipeline of scientists entering or remaining in the research workforce. Environmental health research studies are often necessarily long. For example, epidemiological research tracking the long-term health impacts of exposure to a particular air pollutant requires many years of data collection. Studies tracking these types of impacts will cut across presidential administrations. This proposal gives unprecedented latitude for a given administration to cancel grants that no longer effectuate its priorities. While administrations have every right, within the boundaries set by Congress, to direct new funding opportunities to support their priorities and goals, cancelling existing contracts would cause significant disruption and uncertainty. Multi-year research funding awards made under one administration could be cancelled by a subsequent administration. These studies cannot be switched off and resumed later; the personnel and physical infrastructure rely on stable funding. What's more, funding uncertainty leads to staffing uncertainty, particularly for early career researchers. Separate from the question of whether a particular grant they are working on is cancelled, there is a real possibility that it may prevent them from gaining positions in labs, or dissuade them from entering a career in research altogether.

The proposal also includes additional provisions that would make it more challenging to disseminate and use the results of environmental health research, including limits on spending funds on conferences or for publication in scientific journals. Many of our organizations represent research scientists who publish findings in journals as part of

their federally funded work; all of our organizations rely on the research published in journals to inform our activities. Similarly, many of our organizations attend conferences where we hear from researchers about their federally funded studies. These activities are not separate from the research itself; ensuring that the research is disseminated and used is a fundamental part of doing it in the first place.

Beyond scientific research, federal funding is an essential driver of cleanup of air pollution nationwide – and already includes pollution controls that ensure that these investments are spent properly and advance grant goals. The ways that federal funding helps improve air quality in communities are too numerous to outline in one comment letter, but to name some examples: EPA funds school districts to purchase clean school buses that don't add to the health burden of diesel exhaust on kids' health. Because school buses travel down residential streets and idle while picking up and dropping off students, diesel exhaust emissions impact the health of children, their communities and their schools' teachers and staff. EPA also issues grants to state, Tribal, local and territorial governments to identify and reduce sources of air pollution. The U.S. Department of Energy issues grants to improve energy efficiency and transportation options at the community level. The Centers for Disease Control and Prevention issues grants to cities and states to help protect their residents from extreme heat.

All of these funding awards represent a commitment to the funded groups of support for the duration of the project, as long as they meet all the terms and conditions of the grant. Funded entities, whether governmental or private, need to make investments in staff, supplies and physical infrastructure to carry out the grants. The possibility that these grants could be cancelled mid-term – not for failing to adhere to the terms of the award, but simply because a future administration's priorities have changed – puts awardees at significant risk. Most importantly, it puts community members at risk of losing access to the health benefits of these investments, be it a clean school bus commitment that never arrives at the bus stop or a missing map of cooling centers during a heat wave.

Furthermore, we are concerned that some of the same challenges for research grants could also impact grants for public health work in communities. Adding a permanent layer of political staff decision-making on grants has a strong potential to establish delays in awarding funds. There are additional requirements for grant recipients and sub-recipients by the proposal that would also increase the burden on funded entities. We strongly support transparency and accountability in awarding and spending federal funds, but are concerned that the additional requirements – including an end to fixed awards, requirements to enroll in E-Verify and requirements to provide written justifications for every payment request – will create disproportionate burdens on recipients that detract from the work they do under the grant, particularly for smaller and more community-based entities.

Finally, we note that delays, cancellations and uncertainty in federal funding in 2025 and 2026 have already created significant challenges for public health, including staffing challenges for organizations carrying out on-the-ground work; cancelled air quality projects that would have helped improve public health in polluted communities; and cancelled research grants that led to a loss of scientific progress. We are concerned that this proposal, if finalized, will significantly increase the challenges associated with this uncertainty around federal funds. We urge you to withdraw this proposal and instead work to ensure that federal funds continue to drive successful investments in cleaner air and improved health for people nationwide.

Signed,

Allergy & Asthma Network

Alliance of Nurses for Healthy Environments

American College of Chest Physicians

American Lung Association

American Thoracic Society

Asthma and Allergy Foundation of America

Children's Environmental Health Network

Climate Psychiatry Alliance

International Society for Environmental Epidemiology-North America Chapter

Medical Society Consortium on Climate and Health

Montana Health & Climate

National Association of Pediatric Nurse Practitioners

OUCH-Int'l (Oncology Advocates United for Climate and Health – International)

Physicians for Social Responsibility