

July 13, 2026

Office of Management and Budget
Office of Federal Financial Management
Executive Office of the President
Washington, DC 20503

Re: Regulation for Federal Financial Assistance (RIN 0348–ABXX; 2 CFR Part 200)

The Academy of Nutrition and Dietetics (the “Academy”) appreciates the opportunity to submit comments on the Office of Management and Budget’s (OMB) Notice of Proposed Rulemaking (NPRM), *Regulation for Federal Financial Assistance*, published May 29, 2026 (91 Fed. Reg. 32198).

The Academy respectfully but firmly opposes the proposed rule and urges OMB to withdraw it. As drafted, it would reduce the volume and reach of federally funded nutrition research, raise the cost and uncertainty of conducting that research, and weaken the scientific foundation the nation needs to reverse the chronic disease epidemic. We recognize OMB’s stated goals of improving transparency, accountability, and oversight of federal awards. The proposed changes to 2 CFR Part 200, however, would substantially alter the federal research funding framework in ways that may undermine scientific integrity, disrupt ongoing research, and reduce the effectiveness of federal investments in advancing nutrition research and adoption.

About the Academy

Founded in 1917, the Academy of Nutrition and Dietetics is the world’s largest organization of food and nutrition professionals. The Academy represents over 112,000 registered dietitian nutritionists, nutrition science researchers, and policy professionals committed to improving the nation’s health through evidence-based food and nutrition care. Federal

financial assistance – particularly through the National Institutes of Health (NIH), U.S. Department of Agriculture (USDA), and Centers for Disease Control and Prevention (CDC) – is essential to advancing nutrition research that informs chronic disease prevention, food security policy, dietary guidance, and clinical care. Much of the evidence our members rely on every day originates in research supported through the very federal assistance framework this proposed rule would revise. The Academy’s Scientific Integrity Principles serve as a guide to all Academy members involved in research practices – at all level of dietetics practice.¹

Nutrition Research and the Goals of Make America Healthy Again

The Make America Healthy Again (MAHA) initiative rightly identifies the rising burden of chronic disease, including obesity, type 2 diabetes, cardiovascular disease, and diet-related conditions in children, as a national priority. The Academy shares that urgency. Nutrition is one of the most powerful tools available to prevent and manage chronic disease, and medical nutrition therapy delivered by registered dietitian nutritionists is a proven, evidence-based approach that improves outcomes and lowers health care costs.²

Achieving the goals of MAHA depends on a robust and growing body of nutrition science. The nation cannot reduce chronic disease without understanding which dietary interventions work, for whom, at what dose and duration, and at what stage of life. That understanding comes from federally funded research conducted at universities, academic medical centers, and community institutions across the country. The proposed rule would reduce the amount of nutrition research conducted, raise its cost, make its funding less predictable, discourages dissemination, destabilize multiyear studies, and shift research costs onto institutions. Taken together, the proposed rule would set back national progress on chronic disease at precisely the moment the country has resolved to make that progress a priority. If the United States hopes to lead in addressing chronic disease, it must expand, not contract, the evidence base for nutrition. The proposed rule moves in the wrong direction.

Detailed Comments on Specific Provisions

The detailed comments that follow address seven areas of particular concern to the Academy given their impact on basic and applied nutrition science. For each, the Academy

¹ Lennon, S. L., Kazaks, A., McDermid, J. M., Murphy, M., Lawrence, J. C., & Proaño, G. V. (2022). An update to scientific decision making: the Academy of Nutrition and Dietetics’ scientific integrity principles. *Journal of the Academy of Nutrition and Dietetics*, 122(12), 2346-2355.

² Moloney, L., Rozga, M., Steiber, A., & Handu, D. (2025). The Effectiveness of Medical Nutrition Therapy in Prevention and Treatment of Chronic Disease: A Position Paper of the Academy of Nutrition and Dietetics. *Journal of the Academy of Nutrition and Dietetics*

describes the implications for nutrition and dietetics research and offers a specific recommendation if the proposed rule is not withdrawn.

I. Merit Review and Award Selection (§ 200.205)

The proposed revisions to § 200.205 (Federal agency merit review of proposals) would require a pre-issuance review of discretionary awards to ensure alignment with Administration priorities and the “national interest,” including review by senior political appointees. While the Academy appreciates appropriate oversight, this provision represents a significant departure from the longstanding reliance on independent, scientific peer review as the primary determinant of funding decisions.

Implications for nutrition and dietetics research:

- Nutrition science depends on objective, peer-reviewed methodologies to study complex issues such as diet-related chronic disease, maternal and child nutrition, and food systems. Subjecting awards to policy-based review risks introducing variability and instability across administrations, potentially disrupting long-term research agendas.

Recommendation:

- OMB should revise § 200.205 to affirm that scientific peer review by independent content experts remains the primary basis for award determinations in research programs; and any additional review processes must be to evaluate the integrity of the finding, rather than supplant them.

II. Alignment with Administration Priorities (§ 200.202)

The proposed framework would require federal programs and awards to align with Administration priorities and policy objectives. While alignment with statutory and program goals is appropriate, this provision could create uncertainty for recipients operating multi-year awards, particularly when priorities shift between administrations.

Implications:

- Nutrition research often involves longitudinal studies and multi-year clinical trials that span multiple funding cycles. Shifting alignment requirements may make it more difficult to sustain continuity of research and evidence generation, particularly in areas such as obesity, diabetes, and food insecurity.

Recommendation:

- Clarify that alignment requirements must remain consistent with Congressional authorization and appropriations.

- Confirm that alignment requirements will not be applied retroactively to ongoing awards.

III. Expanded Termination Authority (§ 200.340)

The proposed expansion of § 200.340 (Termination) would allow agencies to terminate awards for convenience when they no longer align with program goals, agency priorities, or the national interest, including the termination of an entire class of awards. Stakeholder analysis highlights that this provision would significantly broaden agency discretion, risk introducing bias into the scientific process, and introduce new risks for multi-year awards.

Implications:

- Reduce the return on federal research investments by terminating studies after substantial resources have been committed to recruitment, data collection, and infrastructure development.
- Create uncertainty that may discourage investigators from pursuing long-term nutrition research requiring extended follow-up periods.
- Disrupt clinical trials and human-subject research, raising ethical concerns. For example, it would be unethical to recruit subjects, ask them to invest time and samples, and then quit the study before the results are available.
- Result in the loss of longitudinal data critical to understanding diet-disease relationships, chronic disease prevention, and long-term nutrition outcomes.
- Undermine research in underserved and rural communities that depends on sustained engagement.

Recommendation:

- Limit discretionary termination authority to clearly defined circumstances;
- Require transition periods and safeguards for ongoing research, especially human-subject studies; and
- Provide clear standards and due process protections for recipients.

IV. Elimination of Fixed-Amount Awards (§ 200.333)

The NPRM proposes eliminating fixed-amount awards and subawards. While intended to increase transparency, this change would reduce flexibility for certain types of research and programmatic activities.

Implications:

- Many nutrition initiatives, such as community-based interventions, pilot programs, and workforce training, rely on flexible funding models.

- Eliminating fixed-amount awards may increase administrative burden, discourage participation by smaller or community-based organizations, and reduce innovation in early-stage research.

Recommendation:

- Retain fixed-amount awards for appropriate use cases, particularly pilot studies, demonstration projects, and community-based research.

V. Payment and Reporting Requirements (§ 200.305)

Proposed changes to § 200.305 (Payment) would require additional justification for drawdowns.

Implications:

- Increased reporting requirements may divert resources away from research activities.
- Smaller institutions and community partners, especially those in rural communities, may be disproportionately affected.

Recommendation:

- Ensure that additional reporting requirements are proportionate and risk-based, and do not create unnecessary administrative burden for low-risk recipients.

VI. Restrictions on Foreign Collaboration (§ 200.220)

The NPRM includes new restrictions on “covered foreign entities” and international collaborations.

Implications:

- Nutrition and food systems research often requires global collaboration, including epidemiological and agricultural studies.
- Overly broad restrictions could limit participation in international research consortia and reduce U.S. leadership.

Recommendation:

- Provide clear definitions and exemptions to ensure that legitimate academic and public health collaborations are not unintentionally restricted.

VII. Cost Allowability and Research Dissemination (Subpart E)

The proposed rule introduces new restrictions on allowable costs, including publication, conferences, and outreach. The proposal also directs agencies to prefer applicants with lower indirect cost rates, which, together with the disallowance of these categories of cost, would reduce the indirect cost recovery

that supports essential research infrastructure such as compliance, data security, and human subject protections.

Implications:

- Dissemination of research findings through scientific conferences, professional education, stakeholder engagement, and public communication is essential for advancing evidence-based nutrition practice and policy.
- Restrictions on publication and outreach could slow the translation of research into clinical care and public policy, stranding the public investment before it can produce a public return.
- Reduced indirect cost recovery forces institutions either to subsidize federal research from other sources or to conduct less of it, weakening the infrastructure on which nutrition research depends.

Recommendation:

- Preserve the allowability of costs associated with scientific publication and dissemination, professional education and training, and community engagement; and
- Remove indirect cost rate level as a competitive factor in award selection.

Conclusion

The Academy of Nutrition and Dietetics believes the proposed revisions to the Uniform Guidance represent a fundamental shift in federal grantmaking that would negatively impact nutrition science. This outcome runs counter to the goals of MAHA, which depend on a strong and growing nutrition evidence base to combat chronic disease. **We respectfully urge OMB to withdraw the proposed rule to ensure that federal financial assistance continues to support rigorous, evidence-based nutrition and public health research that improves outcomes for all Americans.** The Academy appreciates the opportunity to provide input and stands ready to work collaboratively with OMB to ensure the research enterprise advances with both accountability and scientific excellence. Please contact Kelly Horton, SVP, Public Policy & Government Relations, at khorton@eatright.org with any questions.



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