



Timeline of Administration Actions: Impacting Medical and Public Health Research

May 13, 2025

- **HHS and FDA Launch Deregulatory RFI**
 - HHS and FDA issued a [Request for Information](#) (RFI) with a 60 day comment period, as part of implementing President Trump's Executive Order, ["Unleashing Prosperity Through Deregulation."](#) The [initiative](#) includes a "10-to-1" rule (eliminate ten regulations for every new one), a regulatory cost cap requiring total regulatory costs in FY25 to be significantly below zero, an expanded scope that applies to formal and informal regulatory actions, and annual public reports to increase transparency.

May 12, 2025

- **Executive Order on "Most-Favored-Nation" Drug Pricing**
 - President Trump signed an [Executive Order](#) and published a [fact sheet](#), directing HHS to pursue "Most-Favored-Nation" pricing for prescription directing the Department of Health and Human Services to pursue "Most-Favored-Nation" pricing for prescription drugs under Medicare and Medicaid. The order outlines steps to align U.S. drug prices with those in comparable developed nations and includes provisions for direct-to-consumer sales, rulemaking, importation, and trade enforcement actions if manufacturers do not comply.

May 5, 2025

- **Executive Order Restricts Federal Funding for Gain-of-Function Research**
 - President Trump issued an [executive order](#) and corresponding [fact sheet](#), halting federal funding for "dangerous" gain-of-function (GoF) research conducted in countries of concern, including China. The order also suspends federally funded GoF research in the U.S. pending the creation of new oversight policies. It directs agencies to strengthen enforcement, increase transparency, and update existing frameworks for biosafety and nucleic acid synthesis screening. A strategy to govern non-federally funded GoF research is also required within 180 days.

□ **Executive Order on Domestic Pharmaceutical Manufacturing**

- President Trump signed an [executive order](#) and released a [fact sheet](#), directing the FDA, EPA, and Army Corps of Engineers to revise regulations and streamline approvals for domestic pharmaceutical manufacturing. The order also increases inspections and reporting requirements for foreign manufacturing facilities.

May 2, 2025

□ **President Releases FY26 “Skinny” Budget Proposal**

- The White House released its [Fiscal Year 2026 “skinny” budget](#), proposing substantial reductions across major health and science agencies. The plan includes a 26.2% overall cut to the Department of Health and Human Services (HHS) compared to FY25 enacted levels. Proposed agency-specific cuts include a 38% reduction for the National Institutes of Health (NIH), 38.9% for the Centers for Disease Control and Prevention (CDC), 35% for the Agency for Healthcare Research and Quality (AHRQ), and 57% for the National Science Foundation (NSF). Final funding decisions will be made by Congress during the appropriations process.

□ **NIH Conducts Second Round of Layoffs**

- NIH carried out a second round of layoffs, affecting about 200 employees, including roughly 50 at the National Cancer Institute, as part of the broader HHS reduction-in-force that began April 1. HHS stated that an equivalent number of staff will be rehired in critical areas, emphasizing that the move aims to redirect resources without disrupting operations.

□ **NIH Orders Review of Foreign Research**

- An [internal NIH email](#) directed a comprehensive review of all NIH-funded research with a foreign component. The message stated that any significant research conducted abroad “should be closed down” unless it cannot be done domestically and clearly benefits the American public. This follows a May 1 announcement restricting foreign subawards.

May 1, 2025

□ **NIH Updates Policy on Foreign Subawards**

- NIH [announced](#) that foreign subawards will no longer be allowed under parent grants. Instead, foreign collaborators will receive separate, linked awards. The policy applies prospectively to all NIH grants and cooperative agreements and will be implemented by September 30, 2025. NIH also

paused funding to foreign institutions under new or renewal grants and plans to review all grants with a foreign component.

April 24, 2025

- **HHS Reverses Decision to Cut Women's Health Initiative Funding**
 - The Department of Health and Human Services (HHS) reversed its earlier decision to end funding for the Women's Health Initiative (WHI). Just three days after announcing that regional center contracts would be terminated, HHS confirmed that funding would be restored, allowing the 30-year-old study, one of the largest on women's health in U.S. history, to continue its work.

April 21, 2025

- **NIH Updates Terms to Align with New HHS Grant Policy**
 - NIH issued a [revised policy update](#) to its terms and conditions of award, aligning with HHS's April 16 directive. The update includes similar restrictions on DEI-related programming and boycott activities and affirms NIH's authority to terminate awards and recover funds for noncompliance.
- **Harvard Files Lawsuit Over \$2B Funding Freeze**
 - Harvard University [filed a lawsuit](#) in the U.S. District Court for the District of Massachusetts against HHS, NIH, and other federal agencies and officials, challenging the freeze of over \$2 billion in federal funding. The complaint cites violations of the Administrative Procedure Act and the First Amendment and argues that the government did not follow required procedures under Title VI before withdrawing support. The lawsuit is part of a broader dispute over federal oversight and conditions attached to grant funding.
- **HHS to End Funding for Women's Health Initiative Regional Centers**
 - HHS [informed investigators](#) that it will terminate contracts for the Women's Health Initiative (WHI) regional centers by the end of September 2025. The WHI coordinating center will remain operational until January 2026, after which its funding status is uncertain. The WHI has been ongoing for over 30 years and currently supports research at sites across six states.

April 17, 2025

- **FDA to Limit Industry Representation on Advisory Committees**

- FDA Commissioner Martin Makary [announced](#) that the agency will limit the participation of industry representatives on advisory committees, except where required by statute. While industry employees may still attend meetings and provide input, their formal role as committee members will be restricted. Going forward, the FDA will prioritize the inclusion of patients and caregivers in these roles, marking a shift in how the agency incorporates external perspectives into its decision-making process.

April 16, 2025

- **Leaked OMB Passback Proposes Major Cuts to HHS and NIH**
 - A leaked [OMB passback document](#) revealed proposed FY26 cuts to the Department of Health and Human Services (HHS), including a 42% reduction to the NIH budget, restructuring NIH from 27 to 8 institutes, and capping indirect cost reimbursement at 15%. The document also outlines significant cuts to the CDC and the creation of a new agency, the Administration for a Healthy America (AHA).
- **HHS Issues New Grant Policy Restricting DEI and Boycott Activities**
 - HHS released an updated [Grants Policy Statement](#), effective immediately, prohibiting recipients of federal grants from operating programs that promote DEI, DEIA, or “discriminatory equity ideology,” or from engaging in “discriminatory prohibited boycotts.” The policy states that violations may result in termination of the award and recovery of funds.

April 15, 2025

- **Executive Order Targets IRA Drug Pricing Provision**
 - President Trump issued an [executive order](#) directing HHS Secretary Robert F. Kennedy Jr. to work with Congress to revise the Inflation Reduction Act’s drug pricing rules. The order specifically calls for changes to how Medicare price negotiations apply to small molecule drugs versus biologics—a long-standing concern for the pharmaceutical industry. The directive signals a potential shift in the administration’s approach to federal drug pricing policy.

April 11, 2025

- **DOGE Launches “Defend the Spend” Initiative**
 - The Department of Government Efficiency (DOGE) launched a new initiative at HHS called “[Defend the Spend](#),” requiring manual review and justification for each drawdown of federal grant funding. The change has led to delays in

grant disbursements across HHS agencies, affecting tens of thousands of payments at NIH, the Administration for Children and Families, and others. Payments that were previously routine are now on-hold pending additional review and approval, including funding for salaries at federally supported health centers. Grantee organizations have reported uncertainty about payment timelines, while agency staff have noted a significant increase in administrative workload as the new process is implemented.

April 9, 2025

- **Appeals Court Overturns Lower Ruling on Probationary Firings**
 - The 4th Circuit Court of Appeals [ruled in favor](#) of the administration, allowing terminations of probationary federal employees to proceed. This decision overturned Judge Bredar's earlier reinstatement order directing the government to rehire around 24,000 probationary workers.

April 8, 2025

- **Supreme Court Halts Order to Reinstate Fired Probationary Federal Employees**
 - The U.S. Supreme Court issued a 7-2 decision [pausing](#) a lower court ruling from Judge William Alsup (Northern District of California and brought by labor unions), that had ordered several federal agencies to reinstate around 16,000 workers, citing lack of standing.
- **NIH and HHS Appeal Permanent Injunction on 15% Indirect Cost Cap**
 - NIH Director Jay Bhattacharya and HHS Secretary Robert F. Kennedy filed to appeal the ruling to the US Court of Appeals for the First Circuit.

April 4, 2025

□ Federal Judge Issues Permanent Injunction Against NIH's 15% Indirect Cost Cap

- U.S. District Judge Angel Kelley issued a [permanent injunction](#) blocking the National Institutes of Health's (NIH) policy to cap indirect cost reimbursements at 15%. This decision prevents the implementation of the cap while legal challenges proceed.

April 3, 2025

□ HHS Ordered to Cut Contract Spending by 35% Across All Agencies

- HHS announced it had been directed by the Department of Government Efficiency (DOGE) to reduce contract spending by 35% across all its agencies, including the NIH, FDA, CDC, and CMS. NIH must implement the cut across its 27 institutes and centers by April 8. Affected services may include specimen storage, genetic counseling, and administrative support.

□ HHS Secretary Announces Reinstatements Following Workforce Reduction Errors

- Secretary of HHS Robert F. Kennedy Jr. announced that approximately 2,000 of the 10,000 recent HHS job cuts were made in error and that reinstatements were always part of the plan. The cuts, implemented in coordination with DOGE, are part of a broader restructuring initiative announced March 27. HHS has not released formal guidance on the reinstatement process.

April 2, 2025

□ Lawsuit Challenges NIH Grant Cancellations

- The American Public Health Association and other plaintiffs [filed suit](#) in the U.S. District Court for the District of Massachusetts against NIH and HHS. The complaint challenges the cancellation of over \$2.4 billion in research grants, alleging violations of the Administrative Procedure Act, HHS grant termination regulations, and the Fifth Amendment's due process clause. Plaintiffs argue the terminations were made without required justification or adherence to established procedures.

March 27, 2025

- **Trump Administration Announced Major Restructuring of HHS**
 - HHS announced a major reorganization that reduces its workforce from 82,000 to 62,000 employees, including 10,000 voluntary departures and 10,000 terminations, with notable cuts at CDC, NIH, and FDA. The plan consolidates 28 divisions into 15, merges key agencies such as BARDA with ARPA-H and ASPE with AHRQ and establishes a new entity—the Administration for a Healthy America (AHA).

March 13, 2025

- **White House Withdraws CDC Director Nomination**
 - The White House unexpectedly withdrew President Trump's nomination of former Rep. Dave Weldon to lead the Centers for Disease Control and Prevention (CDC) just hours before his scheduled Senate confirmation hearing due to a lack of votes for his confirmation.
- **Judge Alsup Grants Injunction on Probationary Employee Firings**
 - Judge William Alsup issued a preliminary injunction requiring six federal agencies—Treasury, Veterans Affairs, Agriculture, Defense, Energy, and Interior—to offer reinstatement to improperly terminated probationary employees. He also extended his previous order blocking further mass termination by OPM while allowing agencies to proceed with reductions in force if they comply with existing laws.
 - Agencies must provide by March 20 a list of all probationary employees fired, along with an explanation of what has been done to comply with the preliminary injunction.
- **Judge Bedar Orders Reinstatement of Fired Federal Employees**
 - U.S. District Judge James Bedar has ordered the Trump administration to reinstate thousands of probationary federal employees, ruling that 18 agencies unlawfully carried out mass firings without individual assessments. His 14-day [temporary restraining order](#) challenges the government's claim that employees were dismissed for performance reasons. The ruling expands on an earlier decision by Judge William Alsup, now requiring additional agencies—including HHS, EPA, and USAID—to reinstate affected workers.

- Judge Bredar's temporary restraining order allows reinstatement through returning employees to work or placing them on leave, with broader relief to be considered at a March 26 preliminary injunction hearing.
- **Trump Administration Appeals Reinstatement Orders**
 - Following the rulings from Judges Alsup and Bredar ordering the reinstatement of fired probationary employees, the Trump administration has appealed both cases. Agencies have raised concerns over the administrative burden of rehiring employees and the potential disruption if the reinstatement orders are later overturned.

March 7, 2025

- **States Seek Emergency Halt to Federal Layoffs**
 - Following their lawsuit against federal agencies, the 20-state coalition, including D.C. and Maryland, filed for a [temporary restraining order](#) to immediately stop further terminations while the case proceeds.

March 6, 2025

- **NIH Announce Plans to Centralize Peer Review**
 - The National Institutes of Health (NIH) [announced plans](#) to centralize the peer review process for all grant applications, cooperative agreements, and research and development contracts within its Center for Scientific Review (CSR).
- **States Challenge Mass Federal Layoffs**
 - Attorneys general from 20 states, including D.C. and Maryland, sued federal agencies over mass layoffs of probationary employees, arguing they violated federal law by skipping required notice and procedures. [The lawsuit](#) seeks to halt further terminations, reinstate fired employees, and ensure future layoffs follow legal protocols.

March 5, 2025

- **Federal Judge Blocks Trump Administration's 15% Cap on NIH Indirect Costs**
 - U.S. District Court Judge Angel Kelley issued a nationwide preliminary injunction blocking the Trump administration's attempt to cap National Institutes of Health (NIH) payments for research overhead at 15%. The ruling prevents immediate cuts to NIH research overhead while three lawsuits—filed by states, universities, and medical research groups—proceed through federal court.

March 4, 2025

□ OPM Revises Memo on Probationary Employee Firings

- Following a court ruling that OPM lacked the authority to direct agencies to fire probationary employees, OPM [revised its January 20 memo](#). The updated version states that agencies have the final authority over personnel decisions but does not instruct agencies to reinstate previously terminated employees or halt ongoing terminations.

March 3, 2025

□ HHS Rescinds Richardson Waiver

- The Department of Health and Human Services (HHS) [rescinded](#) the Richardson Waiver, a policy in place since the Nixon administration that allowed public input on rules related to public property, loans, grants, benefits, and contracts. Under the new policy, HHS will only seek public comment when explicitly required by the Administrative Procedure Act (APA), which does not mandate input on these types of rules.

February 27, 2025

□ Judge Temporarily Blocks Mass Firings of Probationary Employees

- Judge William Alsup ruled that the Office of Personnel Management (OPM) lacked the legal authority to direct federal agencies to fire probationary employees. Due to jurisdictional limits, his ruling only applies to six agencies, including the National Park Service, National Science Foundation, Small Business Administration, Bureau of Land Management, Department of Veterans Affairs, and Department of Defense. However, Alsup acknowledged he could not directly order other agencies to halt the terminations.

February 26, 2025

□ Joint OMB and OPM Guidance Issued for Large-Scale Federal Workforce Reductions

- OMB and OPM [issued guidance](#) directing federal agencies to submit Phase 1 workforce reduction and reorganization plans by March 13, 2025, and Phase 2 plans by April 14, 2025, as part of President Trump's Department of Government Efficiency Workforce Optimization Initiative, outlining personnel cuts, office consolidations, and budget reductions.

February 21, 2025

- **Court Hearing on NIH Facilities and Administrative Cost Cap**
 - U.S. District Judge Angel Kelley [extended that temporary block](#) until she rules on an injunction, a more permanent decision.

February 19, 2025

- **Lawsuit Filed Against OPM Over Mass Probationary Employee Firings**
 - Four labor organizations representing hundreds of thousands of federal employees [filed a lawsuit](#) against the U.S. Office of Personnel Management (OPM) in the Northern District of California, challenging the mass termination of probationary employees. The lawsuit seeks an injunction and legal relief. (*complaint [amended](#) February 23rd*)

February 14, 2025

- **OPM Orders Termination of Probationary Employees**
 - On February 13, OPM instructed agency HR leaders to begin terminating non-mission-critical probationary employees, followed by a [February 14 email](#) setting a February 17 deadline for their separation.

February 13, 2025

- **Executive Order establishing the President's Make America Healthy Again Commission**
 - President Trump issued an Executive Order entitled "[Establishing the President's Make America Healthy Again Commission](#)" to focus on chronic illness and chaired by the Secretary of Health and Human Services.

February 11, 2025

- **Federal Health Agencies Ordered to Restore Websites & Datasets**
 - A federal judge has ordered federal health agencies to restore websites and datasets removed since late January, granting a [temporary restraining order](#) in response to a lawsuit filed by Doctors for America (DFA).
- **Executive Order to Reduce the Size of the Federal Government**
 - President Trump issued an Executive Order entitled "[Implementing the President's Department of Government Efficiency Workforce Optimization Initiative](#)" to reduce the of the federal workforce.

February 10, 2025

□ Legal Challenges to NIH Funding Cap

- A coalition of [22 state attorneys general](#) filed a [lawsuit](#) in federal court seeking to block the NIH's new policy.
- [APLU](#), [AAU](#), [ACE](#), and research universities [file a separate lawsuit](#) in the District of Massachusetts, assigned to Judge Mary Page Kelley.
- The Association of American Medical Colleges, with the American Association of Colleges of Pharmacy, the Association of Schools and Programs of Public Health, Conference of Boston Teaching Hospitals, and Greater New York Hospital Association filed a [lawsuit](#) in the same court as the lawsuit filed by 22 State Attorneys General.
- District Court Judge Angel Kelley of the U.S. District of Massachusetts issued a [temporary restraining order](#) late Monday, [blocking the Trump administration's cuts](#) to NIH research funding after 22 states filed a lawsuit, giving the administration until Friday to file an opposition and scheduling a Feb. 21 hearing, while also granting a [similar order](#) in response to a lawsuit filed by the Association of American Medical Colleges (AAMC) that resulted in a [nationwide temporary restraining order](#).

□ Judge McConnell Upholds Halt on OMB Funding Freeze

- U.S. District Judge John McConnell Jr. in Rhode Island [upheld the temporary restraining order](#) (TRO) blocking the Trump administration's federal funding freeze, following an unsuccessful appeal to overturn the ruling. This decision ensures that the administration cannot proceed with pausing or freezing federal funds tied to recent executive orders while legal challenges continue.

February 7, 2025

□ 15% Cap on Indirect Cost Reimbursements

- The NIH [announces a policy change](#) to cap indirect cost rates at 15% for all grants, both new and existing, effective February 10, 2025.

February 4, 2025

□ Legal Challenges to Data Purges and Website Removals

- Doctors for America filed a [lawsuit](#) against OPM, CDC, FDA, and HHS, challenging the removal of health-related datasets and information from government websites.

February 3, 2025

❑ Court Extends Injunction Against OMB Funding Freeze

- U.S. District Judge Loren AliKhan extended a temporary [restraining order](#) against the Office of Management and Budget's (OMB) plan to freeze federal loans, grants, and other financial assistance. The order will remain in effect while she decides whether to issue a longer preliminary injunction.

January 31, 2025

❑ Further Legal Challenges to Funding Pause

- Judge John J. McConnell, Jr. [issued a temporary restraining order](#) blocking the Trump administration's efforts to freeze payments for grants and other programs. The order blocks any suspension of federal dollars to the 22 states that were party to the suit — as well as the District of Columbia.
- A [Notice of Court Order](#) was issued providing guidance on the implications of the above restraining order. The notice states in part: *“Federal agencies cannot pause, freeze, impede, block, cancel, or terminate any awards or obligations on the basis of the OMB Memo, or on the basis of the President’s recently issued Executive Orders... **Agencies may exercise their own authority to pause awards or obligations, provided agencies do so purely based on their own discretion—not as a result of the OMB Memo or the President’s Executive Orders—and provided the pause complies with all notice and procedural requirements in the award, agreement, or other instrument relating to such a pause.**”*

January 29, 2025

❑ Data Purges and Website Removals

- OMB sent out a [Guidance Memo](#) to federal agencies outlining steps that agencies must take to comply with the President’s Executive Order entitled [Defending Women from Gender Ideology Extremism and Restoring Biological Truth to the Federal Government](#) (Defending Women).
- Agencies removed datasets and web pages related to end all programs that promote or reflect gender ideology [HIV, LGBTQ+ issues, gender](#), climate change, and racial diversity.
- The [CDC was ordered to retract all scientific papers involving its researchers](#) from external journals to [remove language](#) not aligning with an executive order recognizing only two sexes.

❑ OMB Memo Rescinded, But Confusion Continues

- The OMB [rescinds](#) the original January 27 memorandum. However, the administration indicates that the review of federal financial assistance programs will continue, and agencies are advised to await further guidance.
- White House Press Secretary Karoline Leavitt [tweets](#) that agencies must still identify and pause funding subject to the executive orders, creating further confusion.
- U.S. District Judge John McConnell Jr. signals he is inclined to block the funding freeze permanently, citing ongoing harm despite the rescission. He instructs the 23 state attorneys general to draft a restraining order, with the Justice Department given 24 hours to respond.

January 28, 2025:

□ Legal Challenges to OMB Funding Pause

- **Morning:**
 - OMB releases a [52-page directive](#) requiring agencies to review financial assistance programs and pause obligations linked to impacted policies. Agencies are required to report planned disbursements through March 15, with responses due by February 7.
 - [OMB clarified](#) that the funding pause applies only to programs directly impacted by specific Executive Orders, excluding programs providing direct benefits to individuals such as Social Security, Medicaid, Medicare, SNAP, student loans, Pell Grants, and Head Start, and urges agencies to consult OMB for guidance on potential exceptions.
- **Afternoon:**
 - A coalition of nonprofits and small businesses [files a lawsuit](#) in U.S. District Court for the District of Columbia challenging the legality of the OMB's funding pause.
 - 23 Democratic state attorneys general file a [separate federal lawsuit](#) in Rhode Island, arguing the spending freeze violates federal law.
- **4:45 PM EST:** U.S. District Judge Loren AliKhan issues a temporary restraining order (TRO), minutes before the deadline, halting implementation of the funding freeze.

January 27, 2025

□ OMB Memo Directing Federal Funding Pauses

- [OMB Memo](#) - directing all federal agencies to pause spending on funding tied to the executive orders (*listed above*), leading to confusion about its scope and implementation. This pause was set to take effect on January 28, 2025,

at 5:00 PM EST and required agencies to submit detailed information to OMB by Feb. 10, 2025, on all projects or activities affected by the pause.

January 21, 2025

□ Communications & Travel Pause

- Department of Health and Human Services (HHS) Acting Secretary Dorothy A. Fink, MD, issues a directive, [Immediate Pause on Issuing Documents and Public Communications](#), in effect through February 1.
- No notices of study sections or advisory councils have been added to the federal register, prohibiting approval of new grants. (*as of Feb 27*)
- January 22, 2025: NIH issues an internal [travel pause email](#), restricting travel approvals.

January 20 – 24, 2025

□ Executive Orders Targeting Federal Spending & Policy Shifts

- President Trump issues a series of executive orders aimed at reducing federal spending, increasing oversight of federal programs, and meeting other presidential objectives. These seven EOs form the basis of the OMB funding pause:
 - (1) [Protecting the American People Against Invasion](#) (Jan. 20, 2025)
 - (2) [Reevaluating and Realigning United States Foreign Aid](#) (Jan. 20, 2025)
 - (3) [Putting America First in International Environmental Agreements](#) (Jan. 20, 2025)
 - (4) [Unleashing American Energy](#) (Jan. 20, 2025)
 - (5) [Ending Radical and Wasteful Government DEI Programs and Preferencing](#) (Jan. 20, 2025)
 - (6) [Defending Women from Gender Ideology Extremism and Restoring Biological Truth to the Federal Government](#) (Jan. 20, 2025)
 - (7) [Enforcing the Hyde Amendment](#) (Jan. 24, 2025)

□ Federal Agencies Ordered to Review and Dismiss Probationary Employees

- Acting OPM Director Charles Ezell directed federal agencies to assess their workforces and consider firing employees in probationary periods. Agencies had until January 24 to identify these employees, who can be dismissed without Merit Systems Protection Board (MSPB) appeal rights.

January 20, 2025

- **Withdrawal from the World Health Organization (WHO):**
 - President Trump signed [Executive Order 14155](#), directing the withdrawal of the United States from the WHO.