



Timeline of Administration Actions: Impacting Medical and Public Health Research

April 8, 2026

- **Administration Drops NIH Indirect Cost Appeal**
 - The Administration [dropped its legal challenge](#) to cap NIH indirect cost reimbursement at 15%, leaving lower court rulings blocking the policy in place. While the litigation pathway has ended, the Administration continues to pursue changes through congressional appropriations process.

April 3, 2026

- **President's FY27 Budget Request**
 - The Administration released its [FY27 budget request](#) proposing significant cuts to NIH, NSF, CDC, AHRQ, and other research agencies, along with NIH policy changes including capping indirect costs, forward funding all research project grants upfront in FY27, and limiting certain salaries. The proposal also includes [reorganization of HHS](#).

March 30, 2026

- **NIH New Chief of Staff**
 - The National Institutes of Health [announced](#) that Elisabeth Armstrong, DBE, has been named Chief of Staff in the NIH Office of the Director.

March 25, 2026

- **NIH Releases Updated Grants Policy Statement (NIHGPS)**
 - NIH released a [revised NIH Grants Policy Statement](#) (NIHGPS), incorporating updated requirements, policy changes, and prior NIH Guide Notices into a consolidated set of terms and conditions for NIH grants and cooperative agreements.

March 4, 2026

- **Coalitions Sue Over Plan to Strip Civil Service Protections**
 - A coalition of federal unions and public service organizations [renewed their lawsuit](#) challenging new regulations that would potentially reclassify some

federal employees as “policy/career” employees that could be fired at will. The Office of Personnel Management estimated that approximately [2%](#) of the federal workforce could be impacted by this rule. This lawsuit combines two previously filed lawsuits by the American Federation of State, County and Municipal Employees, PEEER, and AFGE.

February 23, 2026

- **FDA Draft Guidance on Individualized Therapies for Rare Genetic Conditions**
 - The Food and Drug Administration [issued draft guidance](#) outlining regulatory considerations for the development of individualized therapies for rare genetic conditions, including certain gene therapies tailored to small patient populations or individual patients.

February 18, 2026

- **NIH Director Dr. Jay Bhattacharya will temporarily lead CDC**
 - NIH Director Jay Bhattacharya has been named acting director of the Centers for Disease Control and Prevention while the Trump administration searches for a permanent CDC leader. He will lead both NIH and the CDC during this interim period amid continued leadership changes.

January 22, 2026

- **NIH Ends Fetal Tissue Research Funding**
 - NIH [announced](#) it will no longer fund research using human fetal tissue obtained from elective abortions and will instead prioritize alternative research models, including organoids, tissue chips, and computational approaches.

January 6, 2026

- **FDA Updated Guidance on Digital Health Tools**
 - The Food and Drug Administration issued [updated guidance](#) on clinical decision support software and general wellness devices, outlining changes to how certain digital health tools are evaluated under existing medical device regulations.

January 5, 2026

- **Court Ruling Blocks NIH Action on Indirect Cost Caps**

- A federal appeals court [upheld a ruling](#) preventing NIH from implementing changes to indirect cost reimbursement rates, maintaining existing policy while litigation continues.

December 29, 2025

□ NIH stalled grant review agreement

- The Trump Administration agreed, as part of a settlement in a lawsuit that [NIH will review research grant applications](#) that were previously stalled, denied, or withdrawn during the legal dispute over earlier grant cancellations. The agreement allows NIH to resume its standard scientific review process for those applications, though it does not guarantee specific awards

December 12, 2025

□ NIH Issues Staff Guidance on Priority Alignment in Grant Review

- NIH released [internal guidance](#) directing Institutes and Centers to review grant applications for alignment with the NIH Director's August 2025 "[Unified Strategy](#)" priorities, superseding earlier guidance issued in early 2025.

December 3, 2025

□ NIH Overhauls Grant Submission Process

- NIH [announced](#) the elimination of two long-standing administrative steps for grant submissions. Effective immediately, applicants no longer need to submit Letters of Intent (LOIs) for any Notice of Funding Opportunity (NOFO), and they no longer must contact an NIH Institute or Center (IC) before submitting unsolicited applications requesting \$500,000 or more in direct costs.

November 21, 2025

□ NIH Announces Unified Funding Strategy to Guide Award Decisions

- NIH [released a framework](#) outlining a unified approach to funding decisions across all Institutes, Centers, and Offices, effective beginning with the January 2026 Council round. NIH stated that Institutes will consider peer review information in its entirety and will no longer rely on funding paylines when developing pay plans.

November 14, 2025

- **NIH Posts Job Openings With Short Turnaround**
 - This week, NIH posted job announcements for 12 senior leadership positions with a two-week application window. At this time, 13 of NIH's 27 Institutes and Centers were without permanent directors, and NIH's intramural research program also lacked senior leadership.

November 12, 2025

- **Government Shutdown Ends**
 - Congress passed and President Trump signed a continuing resolution keeping the government open through January 30, 2026.

November 5, 2025

- **Federal Government Shutdown Becomes Longest in U.S. History**
 - Day 36 of the shutdown, the lapse in appropriations surpassed the 35-day record set in 2019, marking the longest shutdown in U.S. history.

October 29, 2025

- **FDA Proposes Draft Guidance to Accelerate Biosimilar Approvals**
 - Health Secretary Robert F. Kennedy Jr., FDA Commissioner Marty Makary, and CMS Administrator Dr. Mehmet Oz [announced](#) new draft guidance, [*Scientific Considerations in Demonstrating Biosimilarity to a Reference Product*](#), to streamline approval of biosimilar drugs.

October 28, 2025

- **Court Extends Block on Federal Layoffs During Shutdown**
 - U.S. District Judge Susan Illston issued a [preliminary injunction](#) maintaining the freeze on Trump Administration efforts to carry out mass layoffs of federal employees during the government shutdown. The ruling builds on the temporary restraining order issued earlier in the month and keeps approximately 4,000 Reduction-in-Force (RIF) notices on hold while the case proceeds.

October 20, 2025

- **Administration Narrows \$100,000 H-1B Visa Fee Scope**
 - The U.S. Citizenship and Immigration Services (USCIS) released [updated guidance](#) clarifying that President Trump's new \$100,000 fee for H-1B visas

applies only to new applicants living outside the United States. Employers must pay the fee after a visa is approved to permit relocation to the U.S.

October 15, 2025

- **Judge Blocks Federal Layoffs During Shutdown**
 - Federal Judge Susan Illston issued a temporary restraining order halting the Trump Administration's plan to fire thousands of federal workers during the ongoing shutdown. The ruling followed lawsuits from federal employee unions arguing that conducting Reduction-in-Force (RIF) actions during a shutdown violates the Antideficiency Act. The order applies to all pending and future RIFs related to the shutdown until further court action.

October 13, 2025

- **Administration Expands "University Compact" Invitation Nationwide**
 - Initially sent to nine institutions, the Trump Administration invited all U.S. colleges and universities to join its ["Compact for Academic Excellence in Higher Education"](#) following MIT's public rejection.

October 11, 2025

- **CDC Reverses Hundreds of Layoffs**
 - The Centers for Disease Control and Prevention emailed about 700 employees, rescinding their prior RIF notices and stating that their firings had been made in error (often attributed to a "coding error"). Roles reinstated span divisions such as MMWR, epidemiology, immunization, and outbreak response.

October 10, 2025

- **Federal Layoffs**
 - The Trump Administration has initiated layoffs of federal employees across multiple agencies during the ongoing government shutdown. According to media reports, approximately 4,200 federal workers across at least seven agencies began receiving reduction-in-force (RIF) notices. At the Department of Health and Human Services (HHS), an estimated 1,100–1,200 employees were notified.

October 3, 2025

- **OMB Removes Back Pay Guarantee from Shutdown Guidance**

- In a [revised FAQ document](#), the Office of Management and Budget (OMB) removed language referencing the Government Employees Fair Treatment Act of 2019, which had guaranteed back pay to furloughed federal employees once a lapse in appropriations ended. This change introduces uncertainty about whether furloughed employees will actually receive back pay, despite OPM's shutdown guidance (last updated Sept. 28) continuing to affirm the back pay guarantee.

October 2, 2025

□ University Compact

- The Administration sent letters to nine public and private universities offering preferential treatment in federal grant funding if they sign a new "[compact](#)." The agreement outlines a combination of operational and ideological pledges aligned with Trump Administration priorities. The Administration has indicated that additional institutions may receive similar offers and also implies that universities declining to sign may face funding disadvantages.

October 1, 2025

□ Federal Government Shutdown Begins

- At 12:01 a.m. on October 1, the federal government entered a full lapse in appropriations, triggering widespread interruptions in discretionary operations and activating agency shutdown contingency plans.

□ NIH Issues Shutdown Guidance for Extramural Community

- The NIH [issued a notice](#) informing the extramural community that normal administrative, oversight, and support services may be unavailable during the funding lapse.

September 28, 2025

□ OMB Shutdown Guidance Updated

- The Office of Personnel Management (OPM) updated its government-wide [shutdown guidance](#) directing agencies to prepare for furloughs and limited operations.

September 24, 2025

□ OMB Shutdown Memo

- OMB [directed federal agencies](#) to prepare Reduction-in-Force (RIF) plans that go beyond standard shutdown furloughs, permanently cutting jobs if funding lapses on October 1.

September 22, 2025

□ White House Autism Announcement

- President Trump and HHS Secretary Robert F. Kennedy Jr. [announced](#) new autism initiatives, including updating the FDA label for acetaminophen (Tylenol) during pregnancy, launching a \$50 million NIH research program, and pointing to leucovorin (folinic acid) as a potential treatment for speech-related deficits. President Trump also mentioned changing the childhood vaccine schedule.

September 19, 2025

□ H-1B Visa Petition Fee

- President Trump issued [a proclamation](#) establishing a \$100,000 fee for new H-1B visa petitions submitted after September 21, 2025. The fee does not affect current H-1B visa holders but applies to new petitions for workers outside the U.S.

September 10, 2025

□ Court Allows Further NSF Grant Cuts

- A federal judge in the District of Columbia [declined to issue](#) a preliminary injunction sought by a coalition of scientific and academic organizations, allowing the Trump Administration to proceed with canceling more than 1,600 National Science Foundation (NSF) research grants valued at over \$1 billion. The ruling permits the Administration's restructuring of NSF programs to move forward while the case proceeds on the merits.

September 9, 2025

□ MAHA Commission Issues Second Report

- The Trump Administration released the [Make Our Children Healthy Again](#), a 20-page strategy report with 128 recommendations to address childhood chronic disease.

□ Supreme Court Issues Temporary Stay

- Chief Justice John Roberts [granted a temporary stay](#) of Judge Ali's ruling, pausing the requirement that foreign aid funds be released while the Supreme Court considers the administration's appeal. The emergency stay

signals that the Court may move quickly, setting up a high-stakes decision on the scope of executive power over congressionally appropriated funds.

September 4, 2025

□ District Court Rules on Withheld Funds

- U.S. District Judge Amir Ali ruled that the White House's attempt to withhold congressionally approved foreign aid without congressional approval was unlawful, finding no statutory basis for the administration's strategy. [The ruling ordered](#) the administration to release the funds by the end of the month.

August 29, 2025

□ OMB Releases Updated A-11 Circular

- OMB issued its revised 940-page [A-11 Circular](#), the annual budget guidance to federal agencies. This version codifies the administration's claim that the president can delay or cancel spending without congressional approval, removes the definition of "impoundment," and expands OMB's authority to attach conditions through apportionment.

□ Politico Reports Administration Cancels ARPA-H Programs

- According to current and former agency staff, the Trump administration abruptly [shut down several key ARPA-H programs](#), including UPGRADE (hospital cybersecurity), HEROES (preventive care incentives), and INDEX (AI for medical imaging). These cancellations account for at least \$150 million in lost federal funding, plus an additional \$200 million in expected private-sector matching for HEROES

August 27, 2025

□ CDC Director Susan Monarez Fired

- Susan Monarez, confirmed as CDC director on July 29, was [removed from her position](#) on August 27. Her dismissal followed weeks of conflict with HHS Secretary Robert F. Kennedy Jr., particularly over vaccine policy and staff decisions. Kennedy appointed HHS Deputy Secretary Jim O'Neill as acting CDC director, and several senior CDC officials resigned in response.

August 25, 2025

□ NIH Issues Principles for Foreign Research Collaborations

- NIH announced [new requirements](#) for research conducted outside the U.S. Projects must include a clear rationale for why the work cannot be conducted domestically and show direct potential to improve the health of Americans.

August 22, 2025

- **NIH Releases Gold Standard Science Plan**
 - NIH [published its plan](#) to implement the White House’s “Restoring Gold Standard Science” executive order. The plan highlights principles such as reproducibility, transparency, unbiased peer review, and acceptance of negative results, with commitments to update programs and policies accordingly.

August 21, 2025

- **Supreme Court Allows NIH Funding Cuts**
 - The Supreme Court [declined to block](#) \$783 million in NIH research funding cuts that were part of the Administration’s anti–diversity, equity, and inclusion (DEI) policy agenda.

August 18, 2025

- **OMB Restores Public Apportionments Website**
 - Following court orders issued in July and August, OMB brought its public apportionments [database back online](#). The site had [been offline since March](#), when OMB removed it despite a 2022 congressional mandate requiring apportionment decisions to be publicly accessible.
- **CDC Employees Receive Final Termination Notices**
 - According to [reports](#) citing the American Federation of Government Employees (AFGE), at least 600 staffers at the Centers for Disease Control and Prevention (CDC) received permanent termination notices. The layoffs follow a recent court decision that protected some employees, while other departments, including violence prevention and the Freedom of Information office, were not covered and are now being cut.

August 15, 2025

- **NIH Director Outlines Research Priorities**
 - NIH Director Dr. Jay Bhattacharya [released a statement](#) outlining the administration’s areas of focus for health and medical research. The

statement highlighted priorities such as expanding research on chronic conditions, strengthening oversight of foreign research funding, setting new requirements for studies involving animals, and shifting approaches in areas such as health disparities research, and gender focused care.

August 13, 2025

- **D.C. Circuit Ruling on Impoundment Challenges**
 - The D.C. Circuit Court of Appeals ruled that only the Comptroller General of the GAO, not grantees or private groups, can sue when the executive branch withholds congressionally approved funds (“impoundment”). While the case involved foreign aid, the precedent could affect NIH, AHRQ, and CDC, limiting the ability of universities, researchers, and advocacy groups to contest frozen or rescinded funding. The case is now returned to the district court.

August 9, 2025

- **Appeals Court Orders OMB to Restore Apportionments Website**
 - The D.C. Circuit Court of Appeals [upheld a lower court ruling](#) requiring OMB to restore its public apportionments database. The court dissolved its earlier stay and set August 15 as the [deadline to bring the site back online](#) and release withheld materials.

August 7, 2025

- **EO: Improving Oversight of Federal Grantmaking**
 - President Trump signed an [executive order](#) overhauling federal grantmaking. It requires political appointee approval for grant announcements and awards, annual reviews to align grants with administration priorities, and allows termination of grants “for convenience.” The order favors institutions with lower administrative costs, restricts grant use in areas tied to race and gender identity, and adds new paperwork and review requirements.

August 6, 2025

- **GAO Says ‘Pocket Rescissions’ are NOT Legal**
 - The Government Accountability Office (GAO) [issued a statement](#) explaining that “pocket rescissions” are unlawful. GAO reaffirmed that once Congress appropriates funds, agencies must obligate them as directed unless Congress later rescinds the funding. The explainer underscored that delaying

or failing to spend appropriated funds to achieve the same result as a rescission violates the Impoundment Control Act.

August 5, 2025

- **HHS Cancels \$500 Million in mRNA Vaccine Projects**
 - HHS Secretary Robert F. Kennedy Jr. [announced the cancellation](#) of 22 vaccine development projects involving mRNA technology, valued at nearly \$500 million. This decision includes canceling or de-scoping projects focused on COVID-19, flu, and other pathogens. Some final-stage contracts will continue to completion, but no new mRNA-based projects will be initiated moving forward.

August 1, 2025

- **OMB Blocks CDC Health Program Funding**
 - OMB, via a footnote in an apportionment memo, [blocked funding](#) for several CDC programs, including youth violence prevention, research on preventing gun injuries and deaths, and efforts targeting diabetes, chronic kidney disease, and tobacco use. Estimates suggest the withheld funding could range from about \$200 million to more than \$300 million.

July 29, 2025

- **OMB Freezes, then Unfreezes, NIH Funding**
 - The Wall Street Journal [reported](#) that an OMB apportionment footnote restricted NIH funds to salaries, administrative expenses, and Clinical Center costs, effectively pausing new grants, contracts, and some renewals. By evening, OMB said the pause was a "programmatic review" and released the funds. Later that evening, OMB stated the review was complete and funds were released, reports state that was after senior White House officials intervened. While NIH now has access to its full FY25 appropriation, the agency has only two months remaining in the fiscal year to obligate an estimated ~\$15 billion.

July 24, 2025

- **Senators Urge OMB to Release Withheld NIH Funds**
 - Sen. Katie Britt (R-AL) and 13 Republican senators [sent a letter](#) to OMB Director Russ Vought urging the administration to spend FY25 funds appropriated for NIH. The senators raised concerns about the slow disbursement of NIH funding, warning that continued delays could

undermine research, jeopardize jobs, and limit U.S. leadership in biomedical science.

July 21, 2025

- **Court Orders OMB to Restore Apportionments Website**
 - U.S. District Judge Emmet Sullivan [ruled that OMB must restore](#) its public website showing apportionments of congressionally appropriated funds. The decision came after lawsuits from Protect Democracy Project and CREW, which argued the site's removal violated a 2022 mandate requiring apportionment decisions to be posted online.

July 14, 2025

- **HHS Carries Out Mass Layoffs Following Supreme Court Ruling**
 - Thousands of employees across federal health agencies, including NIH, CDC, and FDA, were [officially terminated](#) as of July 14, following a July 8 [Supreme Court decision](#) that allowed the Trump Administration to proceed with its Reduction in Force (RIF) plans. The firings stem from an [executive order](#) issued in February and a March 27 HHS reorganization plan that aimed to eliminate 10,000 positions. While some employees had previously been reinstated, and others remain temporarily protected by a preliminary injunction in *New York v. Kennedy*, HHS moved forward with separations for all others. Legal challenges are ongoing.

July 10, 2025

- **NIH Disbands Advisory Committee to the Director (ACD)**
 - NIH removed all current members of its top internal advisory panel, the ACD. While turnover is common with new administrations, a complete reset like this is unusual.
- **NIH Limits Animal-Only Research Funding Opportunities**
 - NIH [announced](#) that it will no longer issue Notices of Funding Opportunity (NOFOs) that exclusively support animal models or specify the types of models required. All NOFOs related to animal model systems must now also accommodate human-relevant approaches, such as clinical trials, real-world data, or New Approach Methodologies (NAMs). NAMs include in vitro techniques (e.g., organoids, microphysiological systems), ex vivo models (e.g., perfused organs), computational tools, and AI-based methods.

July 8, 2025

□ **Supreme Court Ruling on Federal Layoffs**

- In [Trump v. AFGE](#), the Supreme Court lifted lower-court injunctions, allowing the Trump Administration to proceed with mass federal layoffs (RIFs) across multiple agencies. The ruling doesn't settle the legality but enables agency workforce reductions to move forward

July 7, 2025

□ **NIH Issues Guidance on Grant Appeals and Closeout Process**

- NIH released a [guide notice](#) clarifying procedures for grants and cooperative agreements under appeal. The agency stated it will not unilaterally close out awards while appeals are pending and encouraged institutions to use the notice to avoid audit findings related to closeout delays. The update comes amid ongoing review of recent NIH grant terminations.

July 3, 2025

□ **Federal Government Seeks Stay in NIH Grant Termination Cases**

- The federal government filed a second motion for a stay with the U.S. Court of Appeals for the First Circuit, following a June ruling that NIH's mass grant terminations were "void and illegal." The motion seeks to pause enforcement of that ruling in two consolidated cases: Commonwealth of Massachusetts v. Kennedy Jr. and American Public Health Association v. NIH. A previous stay request in District Court was denied. Although NIH has paused additional terminations and is reportedly preparing to reinstate over 900 grants, no formal public announcements have been made.

July 1, 2025

□ **NIH Shares New Public Access Policy Resources**

- NIH released [updated resources](#) on its Grants and Funding website to support implementation of the 2024 Public Access Policy, which is now in effect.

June 27, 2025

□ **Supreme Court Limits Nationwide Injunctions**

- In [United States v. Texas](#), the Supreme Court ruled that federal district courts may no longer issue nationwide injunctions (orders blocking federal policies across the entire country), unless the case is a certified class action. This decision restricts the ability of individual judges to halt federal actions

nationwide and could affect how quickly and broadly executive actions can be challenged in court.

June 25, 2025

- **U.S. Withdraws Funding from Gavi, the Vaccine Alliance**
 - HHS Secretary Robert F. Kennedy Jr. announced that the United States will end its financial contributions to Gavi, the Vaccine Alliance. The U.S. had previously been one of Gavi's largest donors, providing roughly 12–13% of the organization's funding.

June 24, 2025

- **NIH Pauses Grant Terminations**
 - Michelle Bulls, Director of NIH's Office of Policy for Extramural Research Administration, sent an [internal email](#) instructing staff to halt additional grant terminations. The message stated: "Effective immediately, please do not terminate any additional grant projects. Please unrelease all grant projects that are in the [queue] to be terminated."

June 23, 2025

- **White House Issues Memo on "Gold Standard Science" Implementation**
 - The White House Office of Science and Technology Policy (OSTP) issued [agency-wide guidance](#) titled "Agency Guidance for Implementing Gold Standard Science," as directed by the May 23 [Executive Order on "Restoring Gold Standard Science."](#) The memo outlines principles such as transparency, reproducibility, peer review, and openness to negative results. Federal agencies have 60 days to report on their implementation plans.

June 20, 2025

- **Court Blocks NSF 15% Indirect Cost Cap**
 - A [federal judge ruled](#) that the National Science Foundation's (NSF) proposed 15% cap on indirect cost reimbursement was "arbitrary and capricious," halting its implementation. The decision follows similar legal setbacks for other agency efforts to impose indirect cost limits and reflects growing judicial scrutiny of administrative actions affecting research funding. Appeals are expected.

June 18, 2025

□ **NIH Issues Notice Suspending or Terminating Certain Gain-of-Function Research**

- NIH issued a [notice](#) implementing the May 5 Executive Order on [Improving the Safety and Security of Biological Research](#). Effective immediately, NIH will terminate funding and other support for gain-of-function research conducted by foreign entities in countries of concern or lacking adequate oversight. All other NIH-supported gain-of-function research will be suspended pending new policy implementation.

June 16, 2025

□ **Federal Judge Rules NIH Grant Terminations Illegal**

- A federal judge in Massachusetts ruled that NIH’s termination of hundreds of research grants due to “changes in priority” was arbitrary and capricious. The order will restore funding only to researchers named in the lawsuits and in the 16 states that joined the case—covering about 800 of over 2,400 terminated grants. The ruling does not apply to broader institutional cuts, such as those involving Harvard University. An official reinstatement order is expected, with an appeal likely.

June 5, 2025

□ **NIH Congressional Justification Released**

- Further details regarding the Administration’s plan to cut NIH’s budget by nearly 40% were released in the NIH [Congressional Budget Justification](#) (CJ) document. In the document, Dr. Bhattacharya highlights NIH’s main priorities, including research safety and transparency, population health, reproducibility, innovation, and academic freedom. He also specifically mentions two new research initiatives, the new Understanding Autism Spectrum Disorder (ASD) Initiative and the Office of Research Innovation, Validation, and Application (ORIVA), which will work to reduce reliance on animal models.

May 30, 2025

□ **HHS Releases its Budget-In-Brief**

- HHS released the full [budget-in-brief](#) that expanded details on the President’s “skinny” budget that was sent to Congress in early May. This document detailed the proposed reorganization of NIH, reflecting a major downsizing and restructuring of the agency. Proposed agency-specific cuts include a 40% reduction for the National Institutes of Health (NIH), 53% for

the Centers for Disease Control and Prevention (CDC), 35% for the Agency for Healthcare Research and Quality (AHRQ), 57% for the National Science Foundation (NSF), and 3.8% for the Food and Drug Administration (FDA). Congress ultimately determines the budget for these agencies.

May 22, 2025

□ MAHA Report Released

- The White House’s Make Our Children Healthy Again (MAHA) commission—led by HHS Secretary Kennedy—released a [report](#) focused on links between chronic childhood illness and factors such as processed foods, environmental exposures, stress, and over-prescription.

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 Bredar Orders Reinstatement of Fired Federal Employees**
 - U.S. District Judge James Bredar 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.