

August Recess Advocacy Guide

DISCUSSING OMB'S PROPOSED GRANT RULE



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AUGUST RECESS ADVOCACY GUIDE

Talking About the Office of Management and Budget's (OMB) Proposed Grant Rule

Simple talking points, answers to common questions, and tips for advocates

During August, members of Congress leave Washington to work in their states and districts. Many hold town halls or attend local events, and their local offices are “home base,” making this a good time to speak with them and with their staff members in-person or by phone.

Use this guide to explain concerns about the Office of Management and Budget's (OMB) proposed changes to federal grantmaking. You do not need to be a policy expert or use every point. A short, personal conversation can make a real difference.

For More Information: Visit Research!America's [OMB resource page](#).

At a Glance

THE RULE	OMB has proposed sweeping changes to how federal grants are awarded, managed, and terminated.
THE STATUS	Thanks to intensive advocacy, the Senate's continuing resolution (<i>stopgap funding measure</i>), would prevent implementation through Dec. 11, but this hard-won delay, if enacted into law, is only a temporary fix. More advocacy is needed to permanently stop this rule.
THE ASK	Please ask your members of Congress to stop the OMB rule.

The Rule in Plain Language

The [OMB proposal](#) would fundamentally change the way federal research is funded and managed. It would weaken the role of expert scientific review by elevating political review of grant decisions, expanding agencies' authority to suspend or terminate grants, and allowing grant requirements to change after funding has been approved. It would also discourage scientific collaboration through new restrictions on research partnerships, conferences, and publications while imposing significant new administrative requirements that increase costs and slow research. Together, these changes would shift the federal research enterprise away from scientific merit, stability, and collaboration, resulting in fewer research projects and slower progress toward new treatments, cures, and public health advances.

Where Things Stand

The public comment period has closed, but the rule is not final. OMB originally proposed implementing the changes on Oct. 1.

New Development: The Senate's bipartisan short-term government [funding bill](#) includes Section 157, which would prevent OMB from issuing or finalizing this proposed rule, or a substantially similar rule, through Dec. 11.

This is encouraging progress, but it is not a permanent solution. The House passed a different funding bill without this protection, and Congress must still agree on a final version. Even if Section 157 becomes law,

its protection would expire on Dec. 11. **That is why advocates must continue to ask members of Congress to stop the OMB rule.**

Connect With Your Lawmakers

Members of Congress spend much of August working in their states and districts, giving constituents more opportunities to speak with them and their staff.

You can:

- Request a meeting with a district or state office.
- Call the office and leave a message.
- Attend a town hall, listening session, or other local events.
- Speak with staff at an event if your member of Congress is unavailable.

Visit your lawmakers' official websites to sign up for their newsletters and [find contact information](#), as well as upcoming events. Their official social media accounts may also announce town halls and other public appearances.

Keep It Local: Focus on the senators who represent your state and the House member who represents your district. Congressional offices prioritize messages from their own constituents, and messages from outside the state or district are often disregarded.

Once you connect with the office, briefly explain why OMB's proposed rule matters to you, share a local or personal example if you have one, and make a clear request.

Request a Local Meeting

1. Use the member's official website to find the district or state office nearest you.
2. Call the office and identify yourself as a constituent.
3. Request a short meeting with the member of Congress or their staff to discuss OMB's proposed grant rule. *(Note: they may redirect you to speak with the policy person in the D.C. office; that is okay, too).*
4. Provide your phone number and email address. Follow up if you do not hear back within a few business days.
5. A meeting with congressional staff is valuable, even if the member cannot attend. Staff brief the member of Congress and help shape the office's response to policy issues. **Remember to clarify that you are speaking as a private citizen, not on behalf of your employer.**

Sample Script: "Hello, my name is [name], and I am a constituent from [city or town]. I would like to request a short meeting with Senator/Representative [name] to discuss OMB's proposed federal grant rule. I would be glad to meet at the local office or virtually. What is the best way to submit the request?"

Make a Phone Call

You can also call the district offices of your senators and House representative.

1. Find your members of Congress at [Congress.gov](#) and open each member's official website.
2. Locate the district or state office nearest to you.
3. Call and leave a message using the script below.
4. Repeat the process for your other senator or House representative.

Phone Script: "The Office of Management and Budget has proposed sweeping changes to how federal grants are awarded, managed, and canceled, without adequately assessing what those changes could

mean for medical research, patients, or taxpayers. The Senate has taken an important step toward temporarily pausing the rule, but a temporary delay is not a permanent solution. Please ask [member's name] to stop the OMB rule."

Prefer to Send an Email? Use Research!America's [editable template](#) (which will automatically be sent directly to your members' offices) and ask them to stop the OMB rule.

The Ask

Primary Request: Please ask your senators and House representative to stop the OMB rule.

A 30-Second Version

"I support strong oversight of federal funding and making sure taxpayer dollars are spent wisely. My concern is that the Office of Management and Budget's proposed rule would make research funding far less predictable. It would allow ongoing research grants to be ended whenever an administration's priorities change, with no right to appeal. It would also allow OMB to change the rules for a grant after it has already been awarded and, for the first time, require a political appointee to approve every grant before it can be funded. On top of that, it would add significant new paperwork and compliance requirements that would take researchers away from the work taxpayers are funding them to do.

The Senate has taken an important step by temporarily delaying this rule, but a temporary delay is not a permanent solution. Please stop the OMB rule.

Make It Personal and Local

Federal grant rules can sound abstract. A short, personal story can help lawmakers understand what the proposed rule could mean for people in their state or district.

When speaking with members of Congress, briefly explain who you are, what could change because of OMB's proposed rule, and why that consequence matters. Then connect your story directly to the ask.

Aim to speak for 30-60 seconds and focus on one example, such as:

- A patient participating in a clinical trial.
- A research project studying a disease affecting families in your state.
- Jobs that are supported by a local university, hospital, small business, or nonprofit organization.
- A partnership involving rural areas, veterans, farmers, schools, or local health systems.
- The consequences of interrupting a multiyear project after staff have been hired or patients have enrolled.

Tips for Making Your Case

- **Lead with people, not institutions.** Start with the patient, family, or neighborhood that could be affected by OMB's proposal.
- **Keep it local.** Members of Congress want to understand what the rule could mean in their state or district.
- **Acknowledge the goal.** Make clear that you support accountability and responsible stewardship of taxpayer dollars.
- **Focus on the process and consequences.** Avoid assuming or questioning anyone's motives.
- **Use plain language.** Explain what could happen rather than relying on regulatory terminology.

- **Connect the rule to a concrete consequence.** Explain what grant-supported work is underway, who depends on it, and what could happen if the award were disrupted or ended before the project was complete. Avoid suggesting that the rule would automatically terminate a particular project.
- **Highlight the breadth of the impact.** The proposed rule would apply government-wide to multiple sectors. Clarify that its consequences could be felt by patients, researchers, businesses, nonprofits, local officials, and communities nationwide.
- **Discuss American competitiveness when relevant.** Unstable research funding could make it harder to retain scientists, discoveries, and investment in the United States.

Key Talking Points

We support accountability

Strong oversight and safeguards against fraud, waste, and abuse are important. Federal agencies should make sure grant recipients follow the rules and use taxpayer dollars responsibly.

The concern is not with those goals; instead, the concern is that OMB has not shown that the proposed changes would achieve those goals and would create significant new problems.

Major changes require careful analysis of taxpayer effects

OMB's own [analysis](#) says it was unable to determine the proposal's expected costs and that its benefits are not clear because of data limitations.

That leaves taxpayers, federal agencies, and grant recipients without a clear picture of the consequences. Before making government-wide changes that impact so many people, OMB should provide the public with a better sense of how this proposed rule will affect them.

Long-term research requires stability

Medical research and clinical trials often take years to complete. Researchers, patients, staff, and partner organizations make long-term commitments based on the expectation that a grant will continue if the recipient follows the rules and makes appropriate progress.

Think of it this way: This rule applies across the government. If a federal transportation grant were ended midway through a construction project, residents and taxpayers could be left with an unfinished bridge or a road to nowhere. The same risk applies to medical research. Ending a grant midway could interrupt a clinical trial, leave patients without access to an experimental treatment, and delay answers for families waiting for hope. Whether the unfinished project is a bridge or a medical study, taxpayers may never receive the result their investment was intended to deliver. This does not mean a grant should never be terminated. Agencies already have tools to address fraud, misuse of funds, noncompliance, and poor performance.

Scientific decisions require scientific expertise

Scientific peer review brings independent experts together to assess the quality, feasibility, and potential value of research proposals.

Government leaders have a legitimate role in setting broad priorities and ensuring accountability. Political review, however, should not replace or override the technical expertise needed to evaluate whether individual research proposals will deliver results.

Congress decides how taxpayer dollars are spent

Congress establishes and funds programs to address national priorities. The proposed rule would give any administration greater authority to end grants or redirect how those programs operate after Congress has provided the funding.

This raises concerns about Congress' constitutional power of the purse and whether an administration could effectively cancel portions of congressionally approved programs.

The rule would add costs

The proposal would require agencies and recipients to create new review, reporting, payment, and compliance systems. Those requirements take staff time and funding away from research and program delivery.

OMB should identify the added workload and explain how each new requirement would improve accountability before moving forward.

Research progress depends on sharing results

Scientists advance knowledge by publishing findings, presenting those findings at conferences, and collaborating with qualified partners.

Reasonable safeguards are appropriate, particularly when national security or research integrity is involved. These sweeping restrictions, however, would discourage legitimate scientific collaboration and make it harder to share findings with researchers, clinicians, and patients.

Looking to the future

It may be helpful to note that a different administration would have the same authority. Once established, the proposal's powers would be difficult to reverse, empowering future presidents with vastly different priorities.

Common Questions and Suggested Answers

Isn't OMB simply trying to stop fraud, waste, and abuse?

That is an important goal, and federal agencies should hold grant recipients accountable. The concern is that OMB has not demonstrated that these changes would improve oversight. Some provisions could instead add bureaucracy, reduce transparency, and make funding decisions less predictable.

Why shouldn't grants be treated like government contracts?

Contracts generally purchase a defined product or service for the government. Grants support a broader public purpose, such as exploring scientific questions, improving health care, or testing new approaches. Grants still come with oversight and performance requirements, and agencies can already act when recipients misuse funds, fail to comply with requirements, or do not make appropriate progress.

Shouldn't a president be able to align grants with the administration's priorities?

An administration should establish broad policy priorities within the law. The concern is allowing political priorities to override technical review or end individual grants after Congress has funded a program and an agency has made an award. The same power would also be available to every future administration.

What is wrong with political appointees reviewing grants?

Political leaders already help set priorities and oversee agencies. Under the proposed rule, a senior political official would review each grant an agency chooses to award and would be directed not to routinely follow expert peer review recommendations. The rule does not clearly say what expertise that

official would need or when a different decision must be explained, making grant decisions harder to understand and predict. The concern is about the process, not the people involved.

Does the rule eliminate scientific peer review?

No. Peer review would continue to be part of the process. Currently, expert recommendations inform grant decisions, but agencies also consider their mission, priorities, and available funding. Under the proposal, however, political appointees, who would not be required to have relevant experience or expertise, would review and have final say over each grant.

Can't the government already cancel a grant?

Yes. Agencies can already take action for reasons such as fraud, misuse of funding, noncompliance, or failure to meet award requirements. The concern is the proposal's broader authority to end grants based on changing agency or administration priorities, even when a recipient is following the rules and making progress. Further, under the proposed rules, grant requirements could change at any time.

Why does funding certainty matter?

Research organizations hire staff, purchase equipment, establish partnerships, and enroll patients based on multiyear plans. If funding can be ended for reasons unrelated to performance or compliance, organizations may be less willing or able to begin ambitious long-term projects.

Won't this affect only universities?

No. The government-wide grant rules affect nonprofit organizations, hospitals, state and local governments, businesses, research institutions, and many other entities receiving federal financial assistance. Congress needs to hear from sectors beyond biomedical research.

Won't this just mean hiring more administrative staff?

Possibly, but OMB has not provided a meaningful estimate of the additional workload or staffing agencies and recipients would need. Hiring more compliance staff also has a cost, and those resources may have to come from research, patient services, or other program activities.

Aren't conferences and travel sometimes wasteful?

Any expense charged to a federal grant should be reasonable, necessary, and connected to the funded work. Existing rules already require that. Conferences allow researchers to present findings, identify errors, learn about discoveries, and form collaborations. The answer is strong oversight of expenses, not restrictions that could prevent legitimate scientific exchange.

How does this affect competition with China?

The United States competes globally for scientists, investment, and scientific leadership. If researchers cannot rely on awarded funding or collaborate and share results appropriately, they may take their work elsewhere and other countries may benefit.

Are any parts of the proposal reasonable?

Some goals, including clearer oversight and stronger accountability, are reasonable. Individual technical improvements may also be workable. The problem is adopting sweeping, government-wide changes without adequate analysis, clear standards, or sufficient safeguards. OMB should withdraw the current proposal and work with Congress, agencies, recipients, and other stakeholders on a more targeted approach.

Didn't the Senate already stop the rule?

Not permanently. The Senate continuing resolution (CR) includes language that would temporarily prevent the rule from being issued, finalized, or taking effect through Dec. 11. The House has not agreed to that

language, and the provision is not yet law. Even if enacted, the protection would expire unless Congress or OMB takes further action.

Why keep advocating if Congress may delay the rule?

A temporary pause creates time, but it does not eliminate the proposal. OMB is expected to pursue the rule after the pause expires. Continued advocacy is needed to preserve the congressional protection and make clear to members of Congress that the OMB rule must be stopped.

Didn't OMB already receive public comments?

Yes. The comment period has closed, and OMB must now consider the feedback it received. Submitting comments does not guarantee that the proposal will be withdrawn or substantially changed, so congressional engagement remains important.

Is Oct. 1 automatic?

No. Oct. 1 was OMB's proposed implementation date. OMB would ordinarily need to complete the rulemaking process and publish a final rule before the changes could take effect. If Section 157 becomes law, OMB could not issue or finalize the rule, or put it into effect, through Dec. 11.

What can Congress do?

Members of Congress can urge the administration to withdraw or revise the rule, raise concerns publicly, ask federal agencies how the changes would affect research in their states and districts, and work to include protections in future funding bills that limit or prevent implementation of harmful provisions. Hearing from constituents helps lawmakers understand how the proposed rule could affect patients, researchers, universities, hospitals, and local economies.

Helpful Links

- [Research!America's OMB resource page](#)
- [How to Find Your Legislators](#)



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