University of Colorado Denver

July 13, 2026

The Honorable Russell T. Vought
Office of Management and Budget
725 17th Street, NW
Washington, DC 20503

Dear Director Vought,

RE: CU Denver Response to Docket No. OMB 2026-0034 "Regulation for Federal Financial Assistance" to revise 2 CFR Part 200

The University of Colorado Denver (CU Denver) welcomes the opportunity to submit the following comment to the Office of Management and Budget (OMB) for the proposed rule seeking to codify the current Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (Uniform Guidance) in Title 2, Code of Federal Regulations (CFR) as a new regulation ("Uniform Grants Regulation" or "UGR"). We support OMB's continuing efforts to strengthen accountability, transparency, and stewardship of federal financial assistance programs.

CU Denver is Colorado's premier public urban research university whose faculty compete successfully for federal research funding across education, science and engineering, and health and social sciences. Over the last four years, CU Denver has significantly developed its research capacity and grown its research enterprise. At the same time, CU Denver is focused on strengthening the economic and workforce development of the Denver metropolitan region and the State of.

CU Denver currently manages 98 active federal awards involving 72 faculty investigators and in FY2025 $23.1 million in annual federal research funding. These investments support research, innovation, and student opportunities across health sciences, engineering, education, and the social sciences. CU Denver depends upon a transparent, merit-based federal funding system that encourages collaboration, dissemination of scientific discoveries, and workforce development. As part of the state's largest university system, CU Denver is a major contributor to the Colorado economy, with nearly 6,000 employees and an annual economic impact of $665 million.

UGR Comments

Our comments are with respect to five provisions we believe have significant implications for research competitiveness, national security, workforce development, and the effective stewardship of federal research investments:

I. § 200.205(b) Pre-Issuance Review
II. § 200.220 Prohibition of Using Federal funds for Covered Foreign Collaborations
III. § 200.340 Termination and Suspension
IV. § 200.432 Conferences
V. § 200.461 Publication and Printing Costs
VI. Administrative Burden

I. [§ 200.205(b)] Pre-Issuance Review

CU Denver supports federal efforts to ensure that research investments advance important national priorities. To facilitate supporting these national priorities, it is critical that the role of expert peer review be key in funding decisions. The guidance appears to weaken the role of expert peer review and CU Denver recommends changes to strengthen that role.

Federal research agencies have long succeeded by investing not only in current national priorities but also in investigator-initiated, foundational research whose future applications were not immediately apparent. Many transformative discoveries began with no obvious commercial, strategic, or policy relevance at the time they were funded. Fields that are now recognized as national priorities including artificial intelligence, biotechnology, cybersecurity, microelectronics, and quantum computing all benefited from sustained federal investments decades before they became explicit policy priorities. A funding framework that places too much emphasis on today's priorities risks overlooking the next generation of breakthrough discoveries that will drive future economic competitiveness, national security, public health, and scientific leadership.

CU Denver therefore recommends that OMB substantially revise, rather than eliminate, the proposed framework by incorporating safeguards that clarify the central role of expert peer review and ensure transparency, consistency, and objectivity in funding decisions.

Specifically, CU Denver recommends:

- The final rule should clarify that leadership review under § 200.205(b) supplements, rather than supersedes, established merit-review processes.
- The rule should further recognize that peer review remains the primary mechanism for assessing scientific and technical merit in research funding decisions.
- Individuals exercising independent judgment on research awards should possess appropriate subject-matter expertise or consult with qualified experts capable of evaluating scientific and technical merit.
- OMB should clarify how additional review criteria will be applied to promote consistency and predictability across agencies.

These safeguards would better align the proposed rule with the objective review principles reflected elsewhere in the Uniform Guidance while preserving the flexibility necessary for agencies to pursue national priorities. These principles have served the country well, enabling the United States to maintain global dominance in science, engineering and technology for decades.

Federal research assistance programs depend on a stable merit-review framework that differs fundamentally from procurement. The final rule should preserve the primacy of expert review and avoid creating circumstances in which awards can be routinely reconsidered based on changing policy preferences after scientific review and award issuance.

II. [§ 200.220] Using federal funds for covered foreign collaborations

CU Denver supports the federal government's efforts to strengthen research security and protect federally-funded research from inappropriate foreign influence. Universities have invested significant resources in research security programs, disclosure requirements, export control compliance, and investigator training, because we share the goal of protecting U.S. scientific and technological leadership. The proposed restrictions on covered foreign collaborations would benefit from additional clarification to ensure institutions can distinguish impermissible activities from legitimate international scientific collaboration which is necessary for making scientific advancements.

This additional clarification is also needed to differentiate between foreign partnerships that are counter to U.S. interests and those partnerships that are a priority of the U.S. government and further U.S. interests such as the U.S.-India TRUST (Transforming the Relationship Utilizing Strategic Technology). The creation of the TRUST initiative by the Trump administration is an example of positive partnerships that can benefit from further clarification if rule § 200.220 is modified. The TRUST initiative is "…to drive transformative change across key pillars of cooperation. Under this initiative, they committed to a results-driven agenda with initial outcomes this year to demonstrate the level of trust for a mutually beneficial partnership." United States-India Joint Leaders Statement, February 15, 2025. By providing clearer definitions, institutions can engage in initiatives like TRUST with confidence.

CU Denver is concerned that key terms and criteria within the proposed rule may be interpreted inconsistently across institutions and federal agencies. Modern research in science and engineering frequently involves international collaboration, scientific exchange, shared datasets, specialized facilities, and publication partnerships. Without clearer definitions and implementation guidance, institutions are likely to adopt overly restrictive approaches that discourage beneficial collaborations that advance U.S. economic competitiveness and scientific discovery.

CU Denver therefore recommends that OMB substantially revise § 200.220 to provide clearer definitions, objective criteria, and practical implementation guidance. A risk-based approach focused on collaborations that present genuine research security concerns would improve compliance and consistency while preserving the scientific collaboration, workforce development opportunities, and global engagement necessary to maintain U.S. leadership in research.

III. [§ 200.340] Termination and Suspension

The proposed revisions to § 200.340 may have unintended consequences that could negatively impact long term research and U.S. priorities in national security and competitiveness. A hallmark of the U.S. research enterprise, government research contracts provide stable, guaranteed funding. These contracts enable institutions of higher education to make long-term commitments to research facilities and faculty that are necessary for groundbreaking science. Broad discretionary termination authority could undermine long-term scientific inquiry and weaken the research workforce pipeline. Federal awards frequently support graduate research assistants, postdoctoral researchers, and other trainees who depend on project stability for their education, professional development, and transition into the workforce. If awards can be terminated based on changing priorities unrelated to performance or compliance, principal investigators will be less willing to launch ambitious multi-year projects, hire trainees, or invest in research infrastructure and institutions will be less willing to commit to long-term facility development and infrastructure.

CU Denver respectfully recommends that OMB substantially revise § 200.340 to provide for a review process when an administration determines that priorities have changed or shifted and termination is considered. Discretionary termination should be limited to clearly defined circumstances, require project-specific justification, and provide meaningful engagement with recipients before termination or suspension occurs. Agencies should also consider impacts on student training, long-term research efforts, and taxpayer-funded investments. These safeguards would preserve appropriate federal oversight while reducing the risk that valuable federally-funded research is discontinued before delivering its intended public benefits.

IV. [§ 200.432] Conferences

Participation in professional conferences are not ancillary activities; they are a fundamental component of the research enterprise. Conferences often directly support project objectives and provide opportunities

for investigators and student researchers to present findings, obtain feedback, establish collaborations, learn about emerging developments, identify new research directions, and accelerate the transfer of knowledge from federally-funded research into practical applications. Conferences also play an essential role in workforce development and researcher training for faculty and students. They provide graduate students, postdoctoral researchers, and early-career investigators opportunities to present oral and poster presentations, engage with leaders in their fields, receive feedback on their work, and build professional networks. The proposed changes affect costs for attending conferences and disseminating research results. At CU Denver, we estimate that approximately 75% of faculty researchers routinely participate in professional conferences and that approximately 50 federally-funded conference-related trips per year could be affected by additional approval requirements.

Regarding the requirement for prior approval by the Federal agency and inclusion in the terms and conditions of the Federal award, our experience suggests that researchers frequently cannot identify specific conferences during proposal development. Research projects often span several years, and dissemination opportunities often depend on discoveries made during the course of the award. The most appropriate venue for presenting results frequently emerges after research findings become available, and evolving scientific questions, new collaborations, conference deadlines, and changing research communities often shape dissemination plans long after an award has been issued.

For these reasons, requiring routine prior agency approval for conference attendance would create an additional administrative burden for both recipient institutions and federal agencies while limiting the flexibility needed to disseminate federally-funded discoveries effectively. CU Denver recommends that conference participation remain an allowable expense when it directly supports project objectives, scientific collaboration, dissemination of federally-funded research results, and workforce development.

V. [§ 200.461] Publication and Printing Costs

Dissemination of research findings through peer-reviewed publications is a fundamental component of the scientific process and a core responsibility of researchers. Scholarly publication remains the gold standard for communicating discoveries, validating results, enabling replication, and translating federally-funded research into practical applications that benefit society. Federal research investments achieve their greatest public value when findings are broadly disseminated through high-quality peer-reviewed journals and other scholarly outlets. The additional restrictions on publication expenses threaten this important aspect of federal research.

Federal agencies increasingly encourage or require public access to research results. At CU Denver, we estimate that more than 75 scholarly publications associated with federally-funded research require publication-related expenses each year. These publications provide multiple public benefits: they disseminate important findings generated through federal investments, enhance the visibility and impact of federally-funded research programs, and acknowledge the agencies whose support made the work possible. Publications also play a critical role in the professional development of graduate students, postdoctoral researchers, and early-career investigators by helping them build scholarly credentials and prepare for future leadership roles in academia, industry, government, and the nonprofit sector.

This concern is particularly important for public and emerging research institutions such as CU Denver that often possess fewer discretionary resources than larger research-intensive institutions. Under current publication models, article processing charges and open-access fees are frequently necessary to ensure broad dissemination and compliance with federal public-access expectations. If these costs are deemed unallowable, the financial burden would shift to institutions and principal investigators, potentially limiting the dissemination of federally-funded discoveries and creating barriers to public access to research results. Such restrictions could ultimately reduce the return on federal research investments and

impede the communication of knowledge that supports scientific progress, economic competitiveness, public health, and workforce development.

CU Denver therefore recommends that publication-related costs, including open-access publication fees, remain allowable expenses when reasonably incurred for the dissemination of federally-funded research results.

VI. Administrative Burden

Although OMB states the proposal is intended in part to reduce burden, several provisions may increase burden for major research institutions. These include:

- additional subaward reporting requirements;
- related-entity reviews;
- expanded monitoring expectations;
- suspension and termination procedures; and
- new compliance reviews tied to national policy provisions.

Universities have invested heavily in Uniform Guidance implementation. Frequent changes can create retraining costs, system modifications, audit complications and inconsistent agency implementation. To mitigate the impact of changes to Uniform Guidance, CU Denver recommends a sufficiently lengthy implementation period; that OMB provide model terms and conditions; that government-wide FAQs are developed and shared before enforcement begins, and that burden estimates are conducted for universities, non-profits, and other recipients of federal financial assistance.

Conclusion

CU Denver supports OMB's efforts to strengthen accountability and transparency in federal financial assistance while preserving the flexibility needed to foster scientific breakthroughs, workforce development, and responsible stewardship of taxpayer investments.

We respectfully urge OMB to:

1. Revise § 200.205(b) to preserve peer review as the primary basis for research funding decisions and establish safeguards related to documentation, transparency, and subject-matter expertise.
2. Revise § 200.220 to provide clearer definitions, objective criteria, and practical implementation guidance that distinguish security concerns from routine international scientific collaboration, while preserving opportunities for scientific exchange, workforce development, and U.S. research competitiveness.
3. Revise § 200.340 to provide detailed terms and conditions for discretionary termination and suspension authority to protect long-term scientific inquiry, student training, taxpayer-funded investments, and the research capacity necessary to address future national priorities.
4. Revise § 200.432 to maintain conference participation as an allowable expense without broad prior-approval requirements, when participation directly supports project objectives, scientific collaboration, dissimilation of federally-funded research results, and workforce development.
5. Revise § 200.461 to preserve publication costs as allowable research expenses.
6. Consider extending the period of time for implementation to mitigate the large-scale impacts of these changes.

University of Colorado Denver

Thank you for your consideration of these comments.

Sincerely,

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