University of Colorado **Anschutz**

July 13, 2026

The Honorable Russel Vought
Director
Office of Management and Budget
725 17th Street, NW
Washington, DC 20503

RE: University of Colorado Anschutz Comments on Proposed Revisions to the Regulation Governing Federal Financial Assistance - OMB-2026-0034

Dear Director Vought,

On behalf of the University of Colorado (CU) Anschutz, please find our comments regarding the Office of Management and Budget (OMB) proposed revisions to the regulation governing federal financial assistance – commonly referred to as the "Uniform Guidance (UG)" – as published in the Federal Register (Document 2026-10817; 91 FR 32198) on May 29, 2026.

CU Anschutz is a world-class academic medical campus leading transformative advances in science, medicine, education and patient care. The campus includes the University of Colorado's health professional schools, more than 60 centers and institutes, and two nationally ranked independent hospitals - UCHealth University of Colorado Hospital and Children's Hospital Colorado - which see nearly three million adult and pediatric patient visits each year. Innovative, interconnected and highly collaborative, CU Anschutz delivers life-changing treatments, exceptional patient care and top-tier professional training. The campus conducts world-renowned research, supported by $890 million in funding, including $762 million in sponsored awards and $128 million in philanthropic gifts.

As the only academic medical center in the Rocky Mountain Region, CU Anschutz is a national leader in biomedical research, clinical trials, and health care delivery. CU Anschutz currently has over 6,000 faculty members conducting research, 3,800 active research studies, and has submitted over 3,600 research proposals and contracts in fiscal year (FY) 2025.[1] In total, the research infrastructure at CU Anschutz led to a $5.7 billion economic impact in 2024-25.[2]

With gold-standard scientific research at CU Anschutz, our historic federal partnership has proved to be a cornerstone of the Colorado economy. Ensuring that the partnership remains is crucial to improving the health of all Coloradans and Americans. As OMB continues to consider any changes to the UG, we urge the administration to continue to prioritize the role of science

[1] Research Studies at CU Anschutz. (2026). https://researchstudies.cuanschutz.edu/
[2] Leeds College of Business, University of Colorado Boulder. (2025). CU Anschutz Economic Impact 2024-25. https://www.colorado.edu/business/media/18922

in the university/federal partnership and make certain that all investigators have an opportunity to succeed in their research opportunities.

[§200.205(b)] Federal Agency Merit Review of Proposals

To ensure that Gold Standard Science (GSS) remains throughout all federal grants, it is crucial to have policy experts approve any new grants or contracts. Under the proposed changes to the UG, “senior political appointees” would conduct pre-issuance reviews of all discretionary awards, independent of scientific peer review. The proposed change is vague as to who can serve in the capacity of “senior political appointee.”

Scientific expertise is required to ensure GSS through rigorous evaluation of research data and data integrity, to ensure that bias has been mitigated, and that methodologies are valid and incorporate the latest innovative techniques. This rigorous, objective evaluation helps eliminate unproven assumptions by confirming that studies are transparent, reproducible, free of conflicts of interest, and structurally capable of being disproven. Political appointees can, do, and should have a role in determining general funding priorities, the senior political appointee responsible for adjudicating discretionary awards ought to be a senior political appointee that is a scientific expert (e.g. institute or center Director at the National Institutes of Health (NIH)), with the ability to evaluate GSS and interpret the potential impact important to that particular disease and the population/community at risk.

Additionally, we remain concerned about introducing additional logistics and administrative burden by adding a new layer of review into the award process. The proposed new layer of review and evaluation exercises independent judgment apart from the scientific merit review process, leading to significant unpredictability and delays in award timing and dissemination. These changes require that funding pass through a secondary political checkpoint, increasing administrative burden (which uses additional taxpayer dollars) and slowing the distribution of research and programmatic funds, thereby decreasing the pace of scientific discovery.

Enabling senior political appointees who are scientific experts in the given field of research to be jointly responsible for ensuring the federal political priorities are maintained serves both purposes (upholding GSS and political priorities). If seamlessly implemented into the review process, the outcome ought to minimize the need for additional administrative functions and costs, streamlining the review and award process.

[§200.205] Merit Review/Study Sections

The proposed UG reforms reclassify traditional peer and merit review as "advisory only". Scientific peer review is replaced by agency discretion to bypass recommendations from historical, expert-led peer-review panels. The diminished ability to practice GSS through peer review will delay medical, scientific, and public health breakthroughs by allowing politics to override independent science. The downstream consequences of such a policy are that

research becomes less trustworthy, as scientific merit is no longer the primary filter and the people adjudicating aren't scientists nor have scientific expertise.

Additional oversight layers (e.g., pre-issuance review) introduced will add new review steps and lead to delays. Researchers and institutions will need to demonstrate policy alignment, not just scientific merit, which will slow award cycles and increase administrative and compliance workloads, disproportionately burdening early-career researchers. Finally, the proposals explicitly state that appointees are not required to defer to peer reviewers or routinely ratify their recommendations.

We believe there are constructive alternatives that can be implemented to enhance transparency and accountability in the use of taxpayer funds, align with national priorities, and improve oversight and consistency across agencies without risking the credibility and primacy of scientific review. For example, the administration could introduce a dual approval model that preserves peer review as the primary process for adjudicating the scientific merit of proposals and allows senior political appointees who are scientific experts and understand the administration's priorities to participate in decision-making. This allows the senior appointee to be able to apply merit, compliance, and alignment considerations to any grants and contracts for their agency. A model similar to this would protect long-term and ongoing research, safeguard project investments made with taxpayer dollars, and prevent disruption to human participant research.

[§200.340(a)-(b), 200.341(b)-(c), 200.342, 200.343] Grant and Contract Termination and Suspension Authority

Under the current framework, federal grants are generally terminated for noncompliance with grant requirements, mutual agreement, recipient request, or a specific award condition previously defined in the grant agreement. The proposed UG would allow agencies broader discretion to terminate awards if they believe a project no longer advances agency priorities or interests. With a majority of biomedical research projects designed for three to five years, funding that is terminated mid-project despite satisfactory performance can leave investigators and institutions facing substantial uncertainty and risk to important scientific discoveries.

Potential consequences of terminating a research grant mid-project include researchers being hesitant to launch long-term studies, reduced investment in research infrastructure, equipment, and personnel, and a decreased willingness to pursue high-risk, high-reward science. Additionally, in biomedical research projects, it could disrupt clinical trials and delay medical advances. Patients enrolled in ongoing clinical trials depend on consistent funding for medical visits, clinical monitoring, laboratory testing, medical interventions, treatments, therapies, and data collection. The termination of a grant or contract mid-trial would create major operational challenges and potentially leave participants without continuity of medical care or follow-up, raising ethical concerns about enrolling patients in these trials. Clinical trials are crucial as

medical breakthroughs emerge after years of investment (cancer therapeutics, rare disease diagnostics, gene therapy, etc.).

We recommend that agencies have safeguards that preserve accountability, maintain agency discretion in setting funding priorities, and protect ongoing research and GSS. This can be done by grandfathering existing awards, requiring demonstrated noncompliance, fraud, or safety concerns rather than broad statements about priority determinations, and defining a review process with termination criteria before termination is implemented. If a termination is deemed appropriate by agency review, we recommend that OMB provide wind-down funding to support a transition period required for participant safety, data archiving, and dissemination of results.

[§200.421, 200.432, 200.461] Changes to Allowable Costs

The dissemination of science is fundamental to research. Scientific research is complete when findings are subjected to peer review, shared with the scientific community, challenged, replicated, and incorporated into future knowledge. Dissemination is not an optional add-on—it is the mechanism through which scientific discoveries become scientific knowledge. In order to spread GSS, we need to ensure that research is published and shared with the community.

Under this proposal, disallowing publishing and conference fees as allowable costs under a grant will harm the dissemination of science. With agencies such as the NIH establishing "Open Access Policies" that require the open-access publication of research studies, this results in increased out-of-pocket costs for scientists to publish their work.[3] Taxpayers should be able to readily access taxpayer-funded research. However, the open-access model simply shifted costs rather than reducing them.

Easy dissemination of science is especially important for young and early-career investigators. Allowing them to share their research through publications or at conferences helps cultivate the next generation of researchers. CU Anschutz shares the NIH and Administration's priority to support early-stage investigators and researchers (ESI).[4] Currently, we support over 4,250 ESIs and believe it should be as easy as possible for them to make their mark on the scientific community.[5] The proposal for the above allowable costs will increase the barrier for our ESI to share their research and to establish themselves as the future gold-standard scientists.

We believe several changes can be made to the allowable costs policy to ensure that all scientists, especially ESI, can disseminate their research. This includes capping funding for

---

[3] National Institutes of Health. (2025). NIH Public Access Policy Overview | Grants & Funding. https://grants.nih.gov/policy-and-compliance/policy-topics/public-access/nih-public-access-policy-overview

[4] Office of the Director, National Institutes of Health. (2026). Advancing NIH's mission through a unified strategy | National Institutes of Health (NIH). https://www.nih.gov/about-nih/nih-director/statements/advancing-nihs-mission-through-unified-strategy

[5] Includes Assistant Professor, Instructors, Research Assistant, Pre- and Postdoctoral fellows, etc.

allowable publishing costs (e.g., $5,000), requiring publisher cost transparency, and restrictions on allowable publication charges for federally funded research. Furthermore, we believe conference attendance should be allowable under federal funds at an established cap. Institutions would then need to cover costs above the threshold. This would allow smaller institutions and ESIs to grow their researchers' collaborations with the broader research community and ensure broader dissemination of research, resulting in more scientific viewpoints being shared.

[§ 200.332(b), 200.414-200.417] Indirect Cost Rates

Under OMB's proposal, indirect cost rates from the existing negotiation process would be a factor in decisions about which grant is chosen. This would penalize institutions with higher rates due to advanced laboratories and facilities equipped with specialized equipment, clinical trial networks, and the intensive research ecosystem required to conduct high-volume, highly rigorous innovative research. Institutions with the greatest capabilities, expertise, and ability to drive innovation could become less competitive, thereby impacting the effectiveness of GSS. Additionally, the unique nature of clinical trial research at academic medical centers – such as CU Anschutz – requires substantial infrastructure, which can lead to fewer and smaller clinical trials, and high-risk or innovative studies may be harder to conduct. This would result in a slowing of U.S. scientific progress and erode our nation's standing as a global leader in science and innovation.

CU Anschutz has been engaged with the Joint Associations Group (JAG) in their efforts to reform the indirect cost reimbursement model. We agree with the broad recognition that the current methodology should be modernized to better reflect the evolving nature and cost structure of conducting research in today's environment. Rather than implementing a significant policy change at this time, the federal government should allow this collaborative modernization effort, which would provide greater assurance that reimbursed costs accurately reflect the actual infrastructure and administrative resources required to conduct federally sponsored research. While this effort is underway, current negotiated rates should be preserved to ensure rigorous review, oversight, and accountability of institutional costs.

[§§200.101(d), 200.106, 200.110(a)] Uniform Guidance as a Regulation

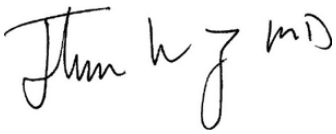
Under this proposed rule, the UG being shifted from a "guidance" to a "regulation" will hamstring an agency's ability to amend and adapt to changes brought forward by future administrations or leaders. Allowing the rule to remain a "guidance" will allow greater agency independence and reduce administrative consolidation within the federal government, leaving power in the hands of a few leaders. We urge the administration to continue to allow for agency independence and keep this rule as a "guidance".

We appreciate OMB's efforts to ensure that GSS is obtained for all federal grants and to promote accountability in scientific research processes. As you consider the final changes to

the UG, CU Anschutz recommends incorporating the above changes to ensure we can continue to be a national leader in research and innovation without increasing administrative burden. With any further questions, please feel free to contact Brett Roude (Brett.Roude@cu.edu), Assistant Vice President for Federal Relations and Health Policy, and Laura Buccini, DrPH, MPH, MA (Laura.Buccini@cuanschutz.edu), Assistant Vice Chancellor for Research Development and Strategy.

Sincerely,

Donald Elliman
Chancellor



Thomas Flaig, MD
Vice Chancellor for Research