VERMONT ACADEMY OF SCIENCE & ENGINEERING℠

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Re: OMB-2026-0034, Office of Management and Budget Regulation for Federal Financial Assistance.

July 9, 2026

To Whom It May Concern at the Office of Management and Budget (OMB),

The Vermont Academy of Science and Engineering (VASE) is an honorary society that supports an understanding of science and technical matters among the citizens of Vermont. Our membership comes from both academia and private industry. As part of our mandate from the Vermont Technology Council "to provide expert and impartial technical advice to the people and the government of the State of Vermont," we consider it important to comment on the proposed new federal guidelines for federal grants.

Scientific, medical, and technological research and development in the United States has led to advances in prosperity, well-being, and national security that are unprecedented in human history. Underlying the work of the many brilliant minds who have created these breakthroughs and discoveries is a system of trust. In the private sector, investors take risks on speculative ventures because they can trust that they will share in the success of ideas that prove beneficial for society. Publicly funded science represents an investment by all Americans, who similarly trust that their tax dollars will generate a positive return in knowledge, health, and prosperity for the nation and the world. This trust is in turn built on America's constitutional guarantees of free expression and equal protection, which have created the open environment of exploration and debate essential to scientific progress.

Despite its enormous successes, recent years have seen significant erosion in the public's trust in academic and scientific institutions. Across the political spectrum, Americans have had cause to wonder whether our institutions are consistently prioritizing knowledge and the public good over self-interest and partisan ideology. Even if such shortcomings represent only a small part of the overall scientific enterprise, they understandably have a disproportionate effect on public perception, since ordinary citizens must rely on scientists to accurately communicate complex and technical subjects.

Some aspects of the OMB guidelines reiterate principles that should help regain public trust in science. Public funds should not be used for political advocacy, for activities that violate federal antidiscrimination laws, or in support of adversarial governments. But to restrict certain areas of research based on ideology is inconsistent with the proven scientific method from which significant scientific breakthroughs frequently emerge. A fungal contaminant on a petri dish could have been tossed in the trash. Instead, an observant mind realized its implications, and so we have penicillin. Fusing a cancer cell to a normal cell in the lab caused the normal cell to become a cancer cell. Seemingly frivolous at first, but this discovery led to the making of monoclonal antibodies, now a multi-billion-dollar industry

that produces a wide array of therapeutics. And so-called "junk DNA; unimportant? Hardly. This led to CRISPR technology that has revolutionized gene editing and cured the first individual of sickle cell disease. And on and on it goes.

VASE is most concerned, however, about OMB's proposal to create a pre-issuance review that will allow political appointees to exclude grant proposals from funding based on criteria that will destroy rather than build trust. While grant programs should be designed to be "consistent with applicable law, Federal agency priorities, and the national interest," decisions within that framework should be made by scientific experts, not political appointees. Vague requirements stating that awards must "demonstrably advance the President's policy priorities," that they must not "promote anti-American values," or that awardees be excluded not by disqualifying actions but merely due to "denial" or "membership in or affiliation with organizations" will clearly be an invitation to abuse by whichever parties hold power now and into in the future. Grantees would not know whether or why their proposal was rejected through this process, and they would be unable to challenge such actions. And allowing grants to be subject to capricious cancellation will discourage long-term investment, just as would happen in the private sector. Taken together, these provisions would essentially allow any administration to disqualify any grantee it disfavors.

There is a reason that the U.S. has been the leader of R&D for generations. Independent scientific peer review has put the National Institutes of Health, National Science Foundation, Department of Energy, and American research universities among the greatest success stories of this country by any metric, be it human health, technological advances, or economic growth. Allowing OMB analysts to override peer review and decide what science is worth funding would prioritize politics over merit. It would greatly compromise prospects for future advances in medicine, national security, and technological innovation.

Respectfully submitted,
The Board of Directors of the Vermont Academy of Science and Engineering