

July 13, 2026

Honorable Russell Vought
Office of Management and Budget
Executive Office of the President
Washington, DC

Re: Regulation for Federal Financial Assistance (RIN 0991-AC35)

Dear Director Vought:

On behalf of the American Kidney Fund, American Society of Nephrology, the American Society of Pediatric Nephrology, and the National Kidney Foundation, thank you for the opportunity to comment on the Office of Management and Budget's (OMB's) proposed rule, *Regulation for Federal Financial Assistance (RIN 0991-AC35)*.

Collectively, our organizations represent patients living with kidney diseases and the kidney health professionals and researchers committed to improving the lives of the more than 37 million Americans living with kidney diseases. Kidney diseases remain among the nation's most significant public health challenges. More than 37 million Americans are living with kidney diseases, kidney failure continues to carry unacceptably high morbidity and mortality, and Medicare spends well over \$140 billion annually caring for people with kidney diseases. Yet kidney research remains underfunded relative to the enormous human and economic burden these diseases impose. Continued progress depends upon a stable, predictable, and scientifically rigorous federal research enterprise.

While our organizations strongly support responsible stewardship of federal resources and appropriate accountability for recipients of federal financial assistance, we are deeply concerned that the proposed rule would fundamentally alter longstanding policies that have made the United States the global leader in biomedical innovation. Taken together, the proposed changes would create uncertainty throughout the biomedical research enterprise, weaken scientific collaboration, discourage long-term investment in research, and ultimately delay the development of new treatments for people living with kidney diseases.

Accordingly, our organizations respectfully strongly urge OMB to rescind the proposed rule in its entirety. The cumulative effect of the proposed changes would undermine the stability, predictability, and scientific integrity of the federal research enterprise in ways that cannot be adequately addressed through piecemeal revisions.

If OMB elects to proceed with a final rule, we strongly urge the agency to substantially revise the proposal to preserve scientific peer review, protect long-term research investments, maintain support for scientific dissemination and collaboration, and ensure that research may continue without uncertainty. The recommendations below identify the minimum changes necessary to reduce harm to the patients we serve and the kidney community.

Scientific Peer Review Must Remain the Foundation of Federal Research Funding
[200.204 and 200.205]

Our organizations are concerned by proposed §§ 200.204 and 200.205, which would require additional review of discretionary awards before funding decisions are finalized. Federal policymakers appropriately establish national research priorities through legislation, appropriations, strategic planning, and agency initiatives. Once those priorities have been established, however, individual research awards should continue to be selected through rigorous scientific peer review. The appropriate and current role for political appointees is to establish the policy and research priorities that guide funding opportunities at the beginning of the process rather than at the end of the process at the expense of peer review.

For decades, the independent peer review process has produced extraordinary advances in biomedical research. It has enabled investigators to pursue innovative, long-term research that has transformed kidney transplantation, expanded treatment options for kidney diseases, improved dialysis care, and accelerated development of new therapies. The proposed rule risks shifting political review from the establishment of broad research priorities to the evaluation of individual awards. This change will undermine confidence in the objectivity of the federal research enterprise and discourage investigators from pursuing innovative projects requiring sustained investment.

We urge OMB to revise §§ 200.204 and 200.205 to reaffirm that scientific peer review remains the primary basis for awarding federally funded biomedical research grants.

Stable Federal Support Is Essential for Kidney Research [200.340]

We are also concerned by proposed § 200.340, which would substantially expand agency authority to terminate discretionary awards.

Kidney research frequently requires many years of sustained investigation before meaningful clinical advances emerge. Longitudinal studies, multicenter clinical trials, pediatric kidney disease research, transplantation research, precision medicine initiatives, and therapeutic development cannot be accomplished under an environment of continual uncertainty. Researchers, institutions, and patients all benefit from a predictable funding environment. Expanding agencies' ability to terminate compliant awards based on changing priorities could discourage innovative research, weaken recruitment of early-career investigators, and reduce institutional willingness to undertake ambitious scientific programs by investing in the required infrastructure and staff.

Our organizations urge OMB to revise § 200.340 to ensure that compliant research awards are not terminated solely because agency priorities evolve after an award has been issued.

Scientific Dissemination and Collaboration Are Essential Components of Research
[200.454 and 200.461]

Our organizations are also concerned by proposed revisions to §§ 200.454, and 200.461, which would restrict the use of funds to defray the costs of publication and conference participation. Scientific discovery benefits patients only when new knowledge is shared, evaluated, replicated, and incorporated into clinical practice. Publication in peer-reviewed journals, participation in scientific meetings, and collaboration among investigators are fundamental components of biomedical research—not ancillary activities.

The current system has helped make the United States the global leader in biomedical innovation. Federal investments in kidney research, combined with the open exchange of scientific knowledge, have contributed to advances in kidney transplantation, home dialysis, precision medicine, pediatric nephrology, and therapies that slow progression of kidney diseases. The proposed restrictions would make it more difficult for investigators to disseminate research findings, establish collaborations, train future researchers, and translate federally funded discoveries into improved patient care. Patients ultimately bear the consequences when scientific advances are delayed.

We urge OMB to retain publication and conference costs as allowable expenses when they directly support dissemination and implementation of federally funded research.

Conclusion

Kidney diseases remain one of the nation's most significant public health challenges, affecting more than 37 million Americans and imposing an enormous human and economic burden on patients, families, and the Medicare program. Continued progress depends on a federal research enterprise that is stable, predictable, collaborative, and guided by scientific excellence.

For the reasons outlined above, our organizations respectfully urge OMB to rescind the proposed rule. The proposal's cumulative impact would weaken the biomedical research ecosystem that has enabled decades of scientific progress and improved outcomes for millions of Americans living with kidney diseases.

Should OMB decide to move forward with a final rule despite these concerns, we urge the agency to adopt the recommendations outlined in this letter. At a minimum, the final rule should preserve scientific peer review as the foundation of research funding decisions, protect long-term research investments from unnecessary disruption, maintain support for publication and scientific collaboration, and clarify that lawful research and public health activities addressing kidney health disparities remain fully permissible.

Our organizations share a common commitment to improving the lives of patients with kidney diseases through scientific discovery, innovation, education, and access to high-quality care. Federal financial assistance policies should reinforce the principles that have made the United States the global leader in biomedical research: rigorous scientific peer review, stable long-term investment, open scientific collaboration, and timely dissemination of research findings.

Thank you for considering our comments. We appreciate the opportunity to provide the perspective of the kidney community and stand ready to work with OMB to ensure that any final policy both safeguards taxpayer resources and preserves the scientific enterprise that millions of Americans living with kidney diseases depend upon.

Sincerely,

American Kidney Fund
American Society of Nephrology
American Society of Pediatric Nephrology
National Kidney Foundation