November 10, 2026

The Honorable Susan Collins
Chair
Committee on Appropriations
United States Senate
413 Dirksen Senate Office Building
Washington, DC 20510

The Honorable Patty Murray
Vice Chair
Committee on Appropriations
United States Senate
154 Russell Senate Office Building
Washington, DC 20510

RE: Protecting Federal Disability and Rehabilitation Research from OMB's Proposed Uniform Guidance Overhaul

Dear Chair Collins and Vice Chair Murray:

On behalf of the undersigned organizational members of the Disability and Rehabilitation Research Coalition ("DRRC"), we write to thank you for your leadership in securing the inclusion of Section 157 in the *Continuing Appropriations and Extensions Act*[1], which prohibits the Office of Management and Budget ("OMB") from issuing or finalizing its proposed *Regulation for Federal Financial Assistance*, or a substantially similar rule, through December 11, 2026.

This provision provides essential, albeit temporary, protection for the federal research enterprise from a sweeping regulatory overhaul that threatens to politicize research funding, destabilize ongoing scientific projects, and impose significant new administrative burdens on grant recipients. As negotiations over government funding intensify ahead of the December 11 deadline, we urge the Senate Appropriations Committee leadership to do everything within your authority to extend this prohibition and prevent the proposed rule from moving forward.

The DRRC is a coalition of national non-profit organizations committed to improving the science of medical rehabilitation, disability, and independent living, including leveraging federal resources in this regard. Our goal is to improve the ability of individuals with disabilities and chronic conditions to function and live as independently as possible.

The DRRC strongly opposes OMB's proposed revisions to the Uniform Guidance governing federal grants under 2 C.F.R. Part 200. Although framed as an effort to improve transparency, accountability, and oversight, the proposal would fundamentally alter the federal grantmaking process in ways that threaten the stability of the nation's scientific enterprise. The proposed rule,

[1] Continuing Appropriations and Extensions Act, 2027, Pub. L. No. 119-103, Div. A, § 157 (Sept. 2, 2026)

if implemented, would elevate political considerations over scientific merit and expand the federal government's discretion to suspend and terminate awards, even when applications are highly scored and have profound scientific merit. In addition, it would also restrict essential research dissemination activities, complicate international scientific collaboration, and eliminate funding mechanisms that facilitate efficient partnerships. Collectively, these changes would undermine decades of established research practices and divert resources away from scientific discovery and toward administrative compliance.

Politicizing Research Funding Would Undermine Scientific Integrity

The DRRC is particularly concerned that the proposed rule would give senior political appointees a substantially greater role in reviewing discretionary grant awards and determining whether the proposed research aligns with Administration policies and priorities. The DRRC strongly opposes this proposal as it will add tremendous uncertainty and lead to significant instability for nonprofit grantees in the federal grantmaking process. Federal research funding has long depended on peer review and merit-based evaluation to assess scientific rigor, innovation, feasibility, and potential public benefit. Elevating political considerations over these established processes would significantly weaken the independence of scientific review and introduce uncertainty into funding decisions that should be grounded in evidence and expertise.

The consequences would be especially damaging for disability and rehabilitation research, which frequently requires sustained, multi-year investments to develop new treatments, improve rehabilitation interventions, advance assistive technologies, and evaluate strategies that promote independence and community participation. Scientific progress depends on continuity, predictable funding, and the ability of researchers to pursue promising lines of inquiry without fear that their work will be abandoned because political priorities have changed. The DRRC strongly believes that a grantmaking framework that allows funding decisions to shift with each Administration would threaten long-term research initiatives, discourage investigator participation, and diminish confidence in the fairness and objectivity of federal research programs.

Threat to Research Continuity

The proposed rule attempts to expand the government's authority to suspend or terminate awards that do not effectuate "the national interest," including based on changing agency priorities, without sufficiently robust procedural protections or meaningful opportunities for recipients to challenge adverse decisions. Combined with increased political influence over funding, this creates a serious risk that ongoing grants could be abruptly cancelled for reasons entirely unrelated to scientific merit or recipient performance.

In essence, this proposed rule would allow an Administration to terminate a grant without cause, if Administration priorities shift. From the DRRC's perspective, such uncertainty would be extraordinarily disruptive and unfair. Multi-year research projects often involve longitudinal studies, clinical investigations, technology development, workforce training programs, and extensive community partnerships. Abrupt termination of an award can result in the loss of years of work, interruption of participant engagement, abandonment of promising lines of inquiry, and

waste of significant taxpayer investments. The absence of a meaningful appeal process further compounds these concerns. When combined with the proposal's increased emphasis on political review of grant awards, the expanded termination authority raises legitimate concerns that grants could be canceled because of changing political priorities rather than performance deficiencies, scientific shortcomings, or compliance failures.

Disruption to the Federal Grants Management System

Beyond the DRRC's substantive policy concerns discussed above, we are deeply troubled by the substantial operational disruption this proposed rule would impose on the federal grants management system. The federal research enterprise functions effectively because it relies on well-established processes, predictable rules, and longstanding partnerships among federal agencies, universities, nonprofit organizations, research institutions, and community-based organizations. The proposed rule would fundamentally alter many of these processes simultaneously, creating uncertainty and inefficiencies that would reverberate throughout the grant lifecycle.

If finalized, the proposal would require federal agencies, grant recipients, and subrecipients to overhaul existing grants management systems, revise policies and procedures, retrain staff, renegotiate collaborative arrangements, modify award administration practices, and implement new compliance frameworks. These changes would not occur in a vacuum. Rather, they would be layered onto an already complex grants management environment, creating uncertainty for institutions administering active awards and for researchers planning future projects. Federal agencies would also need to interpret and implement new requirements, potentially diverting staff time from reviewing applications, issuing awards, and overseeing research programs. The cumulative result could be delays in funding decisions, interruptions in research activities, increased administrative costs, and diminished productivity throughout the federal research enterprise.

These burdens could be particularly consequential for disability and rehabilitation research, which relies on partnerships among universities, nonprofit organizations, rehabilitation providers, community-based organizations, and individuals with lived experience. Increased monitoring and documentation requirements could discourage smaller organizations from participating in federally funded projects, while restrictions on publications and scientific exchange could impede the dissemination of research findings. Ultimately, the proposal would divert resources from scientific discovery toward compliance with a new set of dubious rules, diminishing, rather than enhancing, the return on federal research investments.

Congress Must Act Before the December 11 Deadline

The temporary protection established by Section 157 is an important achievement, but it does not resolve the underlying concerns with the proposed rule. Therefore, the DRRC urges leadership of the Senate Committee on Appropriations to ensure that the next funding measure for FY 2027 extends its prohibition beyond December 11, 2026, covering both the proposed rule and any substantial replacement or revised policy. Congress should not allow this deadline to become an

opportunity for OMB to implement changes that threaten scientific independence, research continuity, and the effective administration of federal grants.

The DRRC further urges you to pursue a durable legislative solution that ensures any future revisions to the Uniform Guidance are informed by meaningful engagement with the disability and rehabilitation research community—as well as the broader medical research community—and preserve merit-based funding, appropriate procedural protections for grant recipients, and efficient grant administration.

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Thank you for your leadership and consideration of these concerns. If you have any questions or if the DRRC can assist you or your colleagues, please do not hesitate to contact Peter Thomas or Michael Barnett, DRRC Co-Coordinators, at Peter.Thomas@PowersLaw.com or Michael.Barnett@PowersLaw.com, or by calling 202-349-4251.

Sincerely,

The Undersigned DRRC Members:

Academy of Physical Medicine & Rehabilitation (AAPM&R)
Academy of Spinal Cord Injury Professionals (ASCIP)
Alliance for NIDILRR Grantees (ANG)*
American Academy of Orthotists & Prosthetists (AAOP)
American Association of Academic Physiatrists*
American Association on Health and Disability (AAHD)*
American Congress of Rehabilitation Medicine (ACRM)
American Medical Rehabilitation Providers Association (AMRPA)
American Music Therapy Association
American Occupational Therapy Association (AOTA)*
American Orthotic and Prosthetic Association (AOPA)
American Physical Therapy Association (APTA)*
American Therapeutic Recreation Association
Association of Academic Physiatrists
Association of Rehabilitation Nurses
Brain Injury Association of America*
National Neurotrauma Society
Paralyzed Veterans of America
RESNA
Spina Bifida Association
United Spinal Association
VisionServe Alliance

****Indicates DRRC Steering Committee Member***