

July 13, 2026

The Honorable Russell Vought
Director, Office of Management and Budget
Executive Office of the President

Re: Comment on “Regulation for Federal Financial Assistance” (OMB–2026–0034)

Submitted electronically via: www.regulations.gov

Dear Director Vought:

On behalf of the International Association for Dental, Oral, and Craniofacial Research (IADR), we appreciate the opportunity to comment on the Office of Management and Budget's (OMB) proposed revisions to the Uniform Guidance for Federal Financial Assistance (OMB–2026–0034).

IADR is the largest organization dedicated to dental, oral, and craniofacial research, representing more than 10,000 members worldwide. IADR brings together scientists from nearly 100 countries to share research findings and advance discoveries that improve oral health and contribute to broader scientific progress. Our membership includes individual scientists, clinician-scientists, dental professionals, and students based in academic, government, nonprofit, and private-sector institutions who are united by a shared commitment to advancing global oral health.

IADR's Global Headquarters is located in the Washington, D.C. metropolitan area. While our largest division is the American Association for Dental, Oral, and Craniofacial Research (AADOCR), approximately two-thirds of IADR's membership resides outside the United States, reflecting the organization's truly global reach and the importance of international collaboration in advancing oral health research.

As a global scientific organization, IADR strongly supports responsible stewardship of a nation's research investments and appropriate oversight of grants. For decades, the United States has attracted many of the world's leading scientists because its research enterprise is built on principals of scientific merit, open exchange of ideas, and collaboration across institutions and national borders. The proposed rule risks moving federal grantmaking away from these longstanding principles by creating unnecessary barriers to global scientific partnerships, restricting dissemination of federally funded discoveries, and limiting participation in scientific meetings that are essential to innovation.

At a time when other nations are substantially increasing investments in research and technology, policies that isolate U.S. investigators or impede the exchange of scientific findings risk weakening our nation's thriving research enterprise. Such restrictions would also reduce the impact and return on federal research investments by limiting the

collaborations, knowledge sharing, and scientific partnerships that are essential to translating discoveries into advances that benefit society.

IADR also supports the comments submitted separately by the AADOOCR, which provide a detailed analysis of the provisions in the rule that would be most detrimental to the U.S. biomedical research enterprise. The comments below focus specifically on the aspects of the proposed rule that would most directly affect the international scientific community.

International Collaboration

(§§ 200.220, 200.331, 200.332, 200.334, 200.450)

Biomedical research is inherently an international endeavor. Investigators routinely collaborate across national borders because many scientific questions simply cannot be addressed effectively by a single institution or even a single country. International partnerships provide researchers with access to specialized expertise, diverse patient populations, and unique resources that are essential for advancing discovery. These collaborations enable investigators to validate research findings across diverse populations, recruit sufficient numbers of participants to conduct statistically meaningful studies of rare diseases and other complex conditions, and evaluate new diagnostics and therapies more efficiently.

This is particularly evident in the field of dental, oral, and craniofacial research. International partnerships have advanced areas such as craniofacial genetics, salivary diagnostics, and the understanding of complex oral and systemic diseases, while also enabling multinational studies of oral cancer and other conditions that require diverse patient populations. These scientific advances depend on researchers' ability to share expertise, biological samples, data, and other resources across borders. Policies that create unnecessary barriers to these exchanges risk slowing discovery, limiting innovation, and reducing the impact of collaborative research efforts.

The proposed rule's expanded requirements governing foreign collaborations, subawards, and monitoring obligations would substantially increase administrative burden while discouraging valuable international partnerships. Rather than strengthening research oversight, these provisions would create uncertainty that could cause investigators and institutions to avoid collaborative projects due to increased compliance obligations and administrative complexity. The resulting barriers would limit opportunities for scientific exchange and reduce the ability of U.S. researchers to engage effectively in global research efforts.

The United States has long benefited from being the preferred partner for international scientific research projects. Maintaining that position cannot be taken for granted. As other nations continue to expand investments in research and cultivate multinational scientific partnerships, the United States should be strengthening - not weakening - its position as the world's leading destination for scientific innovation.

While safeguards to protect research security and national interests are essential, they should be appropriately targeted and risk-based. Broad regulatory barriers that

unnecessarily restrict global collaboration risk reducing opportunities for U.S. investigators to lead multinational research initiatives, limiting access to unique scientific expertise, research infrastructure, and diverse patient populations, and ultimately diminishing U.S. scientific leadership and global competitiveness. A balanced approach should protect against genuine security risks while preserving the international collaborations that drive scientific discovery, medical innovation, and economic growth.

Scientific Dissemination and Publications

(§§ 200.432, 200.454, 200.460, 200.461, 200.462, 200.472)

IADR is deeply concerned that the proposed rule would make publication costs—including article processing charges and open-access fees—unallowable under NIH grants unless specifically required by statute or approved by the awarding agency on a case-by-case basis. This change would create unnecessary barriers to disseminating federally funded research results while conflicting with the federal government's own revised public access requirements.

Scientific research fulfills its public purpose only when its findings are rigorously peer reviewed by experts in the field, published, and incorporated into the scientific record. Publication is not merely the conclusion of the research process—it is the mechanism through which publicly funded discoveries are evaluated, scrutinized, replicated, validated, and ultimately used to inform clinical practice and improve public health. Restricting support for publication costs would undermine the financial sustainability of many journals and the dissemination of federally funded research..

Peer-reviewed journals do far more than disseminate manuscripts. They provide the independent scientific review, editorial oversight, and quality assurance that give clinicians, researchers, policymakers and the public confidence in the integrity and reliability of the scientific literature. Publication costs support this essential infrastructure and represent only a small fraction of the federal government's overall investment in research. Disallowing these costs would not meaningfully reduce research expenditures but would instead create unnecessary barriers to communicating and diminish the return on the public's investment in scientific discovery.

Scientific Meetings and Professional Engagement

(§§ 200.432, 200.454, 200.460, 200.461)

Every year, IADR convenes thousands of dental, oral, and craniofacial researchers and clinician-scientists from around the world to share new discoveries, exchange ideas, and establish research partnerships that often continue long after the meeting concludes. Many multicenter collaborations begin with conversations at scientific meetings like ours rather than through formal grant applications. The IADR annual scientific meeting is held in the United States roughly every other year, reflecting both the scale of U.S. biomedical research investment and the nation's longstanding leadership as a global hub for scientific collaboration.

Scientific conferences provide researchers with essential opportunities to present new findings, exchange ideas with colleagues, receive critical feedback, and establish

collaborations that often lead to future discoveries and innovative research. For many graduate students, postdoctoral fellows, and early-career investigators, presenting at an international scientific meeting is often their first opportunity to showcase their work to a global audience, identify collaborators and mentors, and become active participants in the international scientific community, all of which helps develop the next generation of scientific leaders.

The proposed requirement for case-by-case approval of conference attendance is impractical and would impose significant administrative burdens on investigators and institutions alike. Scientific meetings are planned years in advance, with abstract submission, registration, and travel deadlines that rarely align with the timing of federal award decisions of agency approval processes. Requiring individual approvals for conference attendance would create unnecessary delays and uncertainty, limiting researchers' ability to present their work, engage in scientific exchange, and establish collaborations.

U.S. Scientific Leadership and Global Competitiveness

As a global scientific organization, IADR advocates for robust research investments for all countries, taking into consideration their unique economic position and research needs. The United States became a world leader for biomedical research by fostering an environment where the best ideas—not geography—drive scientific exploration. Researchers from around the world partner with U.S.-based institutions because of their commitment to research integrity, transparency, and academic freedom. This global engagement has been a significant source of U.S. strength, enabling access to expertise, and accelerating scientific discovery innovation. Policies that make international collaboration more difficult risk slowing scientific progress by limiting the necessary exchange of expertise, data, and ideas across borders.

Scientists and research institutions have choices about where to establish international partnerships. Policies that make collaboration with U.S. investigators more difficult—or that create uncertainty about publishing research findings—risk encouraging researchers to build those partnerships elsewhere. Scientific networks are built over time through trust, shared experiences, and sustained engagement; once those relationships shift to other countries, they can take years or even decades to rebuild.

As other nations continue to expand their investments in biomedical research, federal policy should ensure that the United States remains an attractive and trusted partner in the global scientific enterprise. Achieving that goal requires policies that protect research security while preserving the openness and scientific exchange that drive innovation.

Conclusion

IADR respectfully urges OMB to substantially revise the proposed provisions governing international collaboration, publication costs, and conference participation to ensure that federal policies protect research security without creating unnecessary barriers to scientific exchange.

Federal research investments achieve their greatest value when discoveries are openly disseminated, rigorously peer reviewed, and advanced through international scientific collaboration. The proposed rule would undermine these objectives by introducing unnecessary barriers to global research partnerships, scientific communication, and professional engagement.

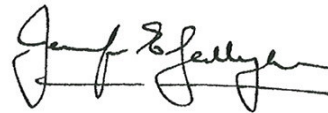
The provisions addressed in these comments would not improve accountability; instead they would make it more difficult for scientists to collaborate, share discoveries, and translate federally funded research into improved health outcomes. These activities are precisely what have made the United States a global hub for scientific discovery and biomedical innovation. IADR respectfully urges OMB to revise the proposed rule to preserve the scientific partnerships, open exchange of knowledge, and collaborative framework that drive innovation.

Thank you for the opportunity to provide comments on the proposed rule.

Respectfully submitted,



Christopher H. Fox, DMD, DMSc
Chief Executive Officer



Jennifer E. Gallagher, BDS, MSc, PhD
President