

FAQ: What OMB's Proposed Grantmaking Rule Could Mean for Vision Research

Why is Alliance for Vision Research concerned?

[OMB's proposed revisions](#) to the Uniform Guidance (2 CFR Part 200) represent one of the most significant proposed changes to federal research grant policy in decades.

The proposal could weaken the role of independent scientific peer review, increase political involvement in funding decisions, expand agency authority over grants, create new barriers to collaboration, increase administrative burden, and introduce uncertainty across the research ecosystem.

How could the proposal affect scientific peer review?

Proposed revisions to **§200.205**, together with implementation of Executive Order 14332, could allow additional review of research proposals after scientific peer review has been completed.

While peer review would remain part of the process, Alliance for Vision Research is concerned that funding decisions could place greater emphasis on Administration priorities, agency priorities, and "national interest" determinations, reducing the influence of expert scientific review.

How could this affect the National Eye Institute and vision research?

NEI-supported research has produced transformative advances in optical coherence tomography (OCT), gene therapy, retinal imaging, artificial intelligence, and regenerative medicine.

Many of these breakthroughs originated from investigator-initiated research without obvious short-term applications. Alliance for Vision Research is concerned that increased emphasis on political priorities could disadvantage the type of exploratory research that historically drives major scientific advances.

Could the proposal increase administrative burden and grant uncertainty?

Yes.

Proposed changes to **§200.208** would expand agency risk assessment and oversight authorities, while other provisions would broaden agency discretion to impose additional award conditions or terminate awards.

Alliance for Vision Research is concerned these changes could create uncertainty for long-term research projects, clinical trials, collaborative studies, and research infrastructure investments.

Could scientific collaboration become more difficult?

Potentially.

Several provisions would increase oversight of foreign collaborations and create additional requirements surrounding conference participation and federally supported research activities.

While Alliance for Vision Research supports research security safeguards, scientific collaboration remains essential to advancing discovery, particularly in rare diseases, multinational clinical trials, and vision research networks.

Could research dissemination and innovation be affected?

Yes.

Proposed revisions to **§200.315** include changes affecting publication costs, journal subscriptions, data rights, intellectual property, and research dissemination activities.

Alliance for Vision Research supports public access to research while preserving incentives for innovation, technology transfer, commercialization, and public-private partnerships that ultimately bring new treatments and technologies to patients.

What about collaborative subawards?

OMB proposes eliminating fixed-amount subawards through revisions to **§200.201** and related provisions.

Alliance for Vision Research is concerned that eliminating these mechanisms could increase administrative costs and reporting requirements for collaborative research projects without improving accountability or scientific outcomes.

Why does this matter for patients?

Patients benefit when the best science receives support.

Policies that weaken peer review, increase political influence, create barriers to collaboration, or expand administrative burden may slow the development of future diagnostics, treatments, and cures for blinding and vision-threatening diseases.

What can members of the vision community do?

OMB is accepting public comments through **July 13, 2026**.

Alliance for Vision Research encourages researchers, clinicians, institutions, patient advocacy organizations, industry partners, and members of the public to submit comments describing how these proposed changes could affect scientific discovery, innovation, workforce development, and patient outcomes.

Could federally funded research grants be terminated after they have already been awarded?

Potentially.

Several proposed provisions would expand federal agencies' authority to impose additional award conditions, reassess ongoing projects, and terminate grants.

Alliance for Vision Research is concerned that these changes could create significant uncertainty for researchers and institutions by making it more

difficult to plan and sustain long-term research programs, clinical trials, workforce development efforts, and investments in scientific innovation. Greater uncertainty could ultimately slow the pace of discovery and delay future advances for patients.

Could the proposal affect scientific conferences, publications, and the sharing of research findings?

Potentially.

Several proposed provisions would increase oversight of conference participation and modify policies related to publication costs, data rights, intellectual property, and research dissemination.

Alliance for Vision Research is concerned that these changes could hinder scientific communication, collaboration, and knowledge sharing—activities that are essential to advancing discovery, accelerating innovation, and translating research findings into improved treatments and outcomes for patients with vision-threatening diseases.

Submit comments:

<https://www.regulations.gov/document/OMB-2026-0034-0001>

Additional Analysis:

Elizabeth Ginexi, PhD

<https://elizabethginexi.substack.com/p/this-new-omb-rule-is-bigger-than>