



Alliance for
Vision Research

Federal research policy threats

OMB Proposed Rule on grant funding

Why this proposal matters

OMB has proposed significant changes to the federal grantmaking framework that governs how research awards are evaluated, funded, managed, and overseen.

If finalized, the proposal could:

- Reduce the role of independent scientific peer review in funding decisions
- Expand political influence over research funding priorities
- Increase administrative and compliance burdens on researchers and institutions
- Create greater uncertainty for active and future research awards
- Increase the potential for grant suspension or termination
- Restrict scientific collaboration, conferences, and dissemination of research findings
- Slow scientific discovery, innovation, and patient progress



A pivotal moment for research policy

The proposed OMB grantmaking rule could significantly reshape how federally funded research is reviewed, awarded, managed, and sustained.

While intended to improve accountability and oversight, the proposal could weaken the role of independent scientific peer review, create greater uncertainty for researchers and institutions, increase administrative burdens, and slow scientific progress.

Ultimately, this issue extends beyond funding levels—it concerns whether research decisions remain guided by scientific merit, expert review, innovation, and patient need.



What's at stake

We believe this proposal could:

- Diminish the role of independent scientific peer review
- Increase political influence over funding decisions
- Create greater uncertainty for active and future research awards
- Add significant administrative burdens across the research ecosystem
- Slow scientific innovation, discovery, and progress



Current process vs.

- Independent scientific peer review drives recommendations
- Predictable grant administration
- Established dissemination practices
- Stable research planning
- Merit-focused review

Proposed changes

- Expanded pre-award review and additional policy/political considerations
- Additional oversight and compliance requirements
- Greater uncertainty around conferences and publication related activities
- Increased administrative complexity and potential delays
- Broader review criteria beyond scientific merit (political appointee review)

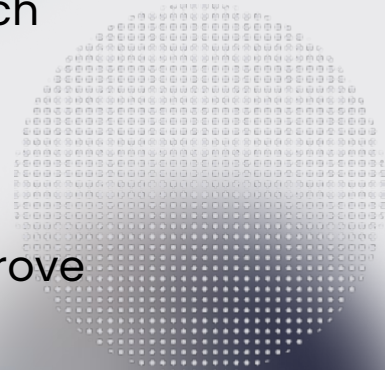
Implications for vision research

- Give political leadership a greater role in determining whether grants align with Admin priorities
- Expand agency authority to terminate or suspend grants that are deemed inconsistent with agency priorities or the national interest
- Restrict support for scientific conferences, publications, professional memberships, and dissemination of research findings
- Increase reporting, compliance, monitoring, and risk-review requirements for awardees



Why this matters to vision research

- Scientific merit should remain the foundation of funding decisions
- Independent peer review should retain its central role
- Administrative requirements should facilitate, not hinder, research
- Policies should encourage collaboration, transparency, and dissemination
- Federal research policies should accelerate innovation and improve patient outcomes



Our response to date

- Convened discussions with national coalition partners
- Drafted a comprehensive organizational comment letter
- Developed customizable template for partner organizations
- Created advocacy materials for researchers, clinicians, patients, and caregivers for individual advocacy
- Prepared educational resources and FAQs
- Coordinated congressional outreach and stakeholder engagement
- Continued monitoring and policy analysis for partners

Comprehensive engagement



Organizational Advocacy

- Formal comment letter
- Coalition coordination and engagement
- Congressional education and awareness

Partner Support & Advocacy

- Template letters
- Guidance documents
- Communications resources and FAQ

Grassroots Mobilization

- Outreach to partners and researchers
- Engagement of patients and caregivers
- Website tools to educate and advocate to OMB and Congress

Our recommendations to OMB

- Preserve independent scientific peer review as the primary basis for funding decisions
- Eliminate or substantially narrow provisions that increase political influence over award determinations
- Minimize unnecessary administrative burdens
- Protect scientific communication, collaboration, and dissemination
- Maintain predictable grant administration and awards
- Avoid changes that discourage innovation or delay research benefiting patients



What we hope to achieve

Preferred Outcome:

Proposal is withdrawn or substantially revised to preserve scientific independence – eliminating or substantially revising key provisions

Acceptable Outcome:

The most concerning provisions are modified or removed, some transparency/process provisions remain with modification

Minimum Outcome:

Peer review remains a priority and funding security and stability is supported to mitigate impacts to the research enterprise





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