

Alliance for Vision Research Comments on OMB-2026-0034

Submitted via Regulations.gov

July 13, 2026

The Alliance for Vision Research appreciates the opportunity to provide comments on the Office of Management and Budget's proposed revisions to the Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards.

The Alliance for Vision Research represents a broad coalition of patients, researchers, clinicians, professional societies, academic institutions, and industry stakeholders committed to advancing vision research and improving outcomes for individuals affected by blinding and vision-threatening conditions. The vision community relies heavily upon federally supported research conducted through the National Institutes of Health, particularly the National Eye Institute, as well as support from other federal agencies, including the Department of Defense, the National Science Foundation, the Centers for Disease Control and Prevention, and other agencies whose research activities are governed by the Uniform Guidance.

The Alliance for Vision Research supports efforts to improve transparency, accountability, stewardship of taxpayer resources, and alignment of federally funded activities with agency missions and public priorities. The goals outlined in the proposed rule are important and widely shared by the research community. However, several provisions within the proposal may unintentionally undermine the effectiveness, predictability, stability, scientific integrity, and collaborative nature of the federal research enterprise that has made the United States the global leader in biomedical innovation.

The impact of federally supported vision research is evident in transformative advances that have improved the lives of millions of Americans. Investments supported by the National Eye Institute and other federal research agencies contributed to the development of optical coherence tomography, which revolutionized the diagnosis and management of retinal disease; the first FDA-approved gene therapy for an inherited retinal disease; and artificial intelligence-enabled diagnostic technologies that are expanding access to early detection and treatment. These and countless other advances demonstrate the value of sustained federal investment, rigorous scientific peer review, specialized institute-level expertise, scientific collaboration, and effective dissemination of research findings.

[\$200.202]**Program Planning and Design**

The Alliance for Vision Research supports the principle that federally funded research should advance agency missions and address important public health needs. However, the National Institutes of Health already maintains extensive mechanisms to ensure that funded research aligns with agency priorities, congressional intent, and public health objectives.

The National Institutes of Health Strategic Plan, institute-specific strategic plans, targeted funding opportunities, advisory council review, portfolio management activities, and ongoing program oversight collectively ensure that funded research advances the missions of individual institutes and centers. This includes the National Eye Institute, which has established strategic priorities and scientific frameworks that guide investments in vision research while preserving investigator-initiated discovery and scientific innovation.

The remarkable success of federally funded vision research demonstrates that the current system effectively balances scientific merit, public health priorities, accountability, and agency mission alignment. National Eye Institute-supported research has helped establish optical coherence tomography as the standard of care for diagnosing and monitoring retinal disease, advanced the development of gene therapies capable of restoring vision in patients with inherited retinal disorders, and accelerated innovations in artificial intelligence that are improving early detection of diabetic retinopathy and other vision-threatening conditions. These breakthroughs were made possible by a research ecosystem that combines strategic priorities with investigator-driven scientific discovery.

The Alliance for Vision Research is concerned that any new requirements affecting the evaluation of research proposals should preserve the central role of scientific merit review and specialized scientific expertise. Long-term biomedical research investments require confidence that funding decisions will continue to be informed by scientific rigor, demonstrated public benefit, statutory mission, and expert evaluation. The predictability and credibility of the federal research enterprise depend upon transparent review processes that complement rather than supplant existing peer review and programmatic assessment mechanisms.

For more than seventy-five years, the National Institutes of Health peer review system has served as the international gold standard for evaluating scientific merit. Through this process, independent experts assess proposals based on scientific rigor, innovation, feasibility, and potential public health impact.

The Alliance for Vision Research encourages the Office of Management and Budget to recognize the effectiveness of these existing mechanisms and ensure that any new requirements complement rather than supplant the role of scientific merit review, institute-level expertise, and investigator-initiated research.

[\$200.205]

Federal Agency Review of Merit of Proposals

The Alliance for Vision Research is deeply concerned about proposed revisions to §200.205 that would establish additional pre-award reviews conducted by senior political appointees and require consideration of whether proposed awards align with Administration priorities, the national interest, and other factors beyond scientific merit.

The National Institutes of Health has developed over decades a globally respected system of scientific peer review that evaluates research proposals based on scientific rigor, innovation, feasibility, investigator qualifications, and potential impact on public health. This system has helped make the United States the world leader in biomedical research and has produced transformative advances in vision science, including optical coherence tomography, gene therapies for inherited retinal disease, artificial intelligence-enabled diagnostic technologies, and numerous sight-saving treatments.

While the Alliance for Vision Research recognizes the importance of ensuring that federal awards comply with applicable law and support agency missions, we are concerned that the proposed framework may unintentionally diminish the role of scientific merit review by introducing additional subjective or politically variable criteria into funding decisions.

The proposal explicitly states that peer review is advisory and that agencies are not required to issue awards based upon the outcomes of scientific review processes. While agencies have always retained discretion in funding decisions, the proposed revisions appear to create a formal mechanism through which highly ranked scientific proposals could be denied funding based on factors unrelated to scientific quality, public health impact, or agency mission.

Biomedical research frequently generates transformative discoveries that could not have been anticipated when the research was first proposed. Many of the most significant advances in vision research originated from investigator-initiated studies driven by scientific curiosity rather than immediate policy priorities. Research that ultimately led to gene therapies, retinal imaging technologies, and artificial intelligence applications in eye care may not have been easily justified under narrowly defined or rapidly changing political priorities at the time the work began.

The Alliance for Vision Research is also concerned that broad and undefined concepts such as "national interest," "institutional commitment," or alignment with evolving Administration priorities may create uncertainty for researchers, institutions, and federal agencies. Lack of transparency regarding how such criteria are applied could undermine confidence in the fairness, predictability, and objectivity of the federal research funding process.

In addition, the introduction of multiple layers of review following scientific peer review may increase administrative burden, delay award issuance, disrupt research timelines, and create additional uncertainty for investigators, trainees, and institutions that rely upon predictable funding cycles to support research personnel, clinical studies, infrastructure, and long-term scientific programs.

The Alliance for Vision Research strongly encourages the Office of Management and Budget to preserve scientific merit review as the primary basis for funding decisions and to ensure that any additional reviews remain narrowly focused on statutory compliance, programmatic relevance, and stewardship responsibilities. Additional review processes should not supplant or diminish the central role of independent scientific evaluation conducted by subject-matter experts.

Maintaining public trust in federally funded research requires funding decisions that remain transparent, evidence-based, scientifically grounded, and insulated from shifting political considerations. The continued success of the American biomedical research enterprise depends upon preserving the independence, credibility, and integrity of the peer review system that has served as the foundation of scientific advancement for generations.

[\$200.206]

Federal Agency Review of Risk Posed by Applicants

The Alliance for Vision Research recognizes the importance of responsible stewardship of taxpayer resources and appropriate risk assessment in federal grantmaking. However, the Alliance for Vision Research is concerned that expanded pre-award review requirements may introduce uncertainty and delays into the grantmaking process. Delays in funding decisions ultimately delay the development of therapies that patients and families are waiting for.

Biomedical research frequently depends upon highly specialized personnel, time-sensitive recruitment activities, complex collaborations, and long-term institutional commitments. Delays in award issuance can disrupt staffing, postpone clinical trial enrollment, delay equipment acquisition, interrupt research continuity, and increase administrative costs.

These concerns are particularly significant for vision research involving progressive and sight-threatening diseases, where delays in research activities may postpone scientific advances that improve patient outcomes.

The Alliance for Vision Research encourages the Office of Management and Budget to ensure that any expanded review requirements are governed by objective, transparent criteria and implemented with clearly defined timelines that minimize disruption to scientific research activities.

[\$200.340]

Termination and Suspension of Awards

The Alliance for Vision Research is concerned that proposed changes to termination and suspension authorities could increase uncertainty regarding the continuation of active research awards. Interruptions to long-term research programs can postpone innovations intended to prevent blindness or restore vision.

Vision research frequently depends upon long-term investments that span many years. Clinical trials, longitudinal cohort studies, population-based research, and large collaborative research networks require substantial commitments from investigators, institutions, patients, and funding agencies.

Greater uncertainty regarding the continuation of awarded grants could discourage ambitious scientific inquiry, reduce institutional willingness to invest in research programs, and create significant barriers for early-career investigators seeking to establish independent careers.

Recent experiences within the federal research enterprise also demonstrate the importance of ensuring that decisions affecting active grants are informed by appropriate scientific expertise and a clear understanding of the underlying research. In several instances, research projects were subject to termination or heightened scrutiny based on characterizations that investigators and institutions argued did not accurately reflect the actual aims, methods, or intended outcomes of the work. Regardless of the ultimate disposition of those cases, they highlight the challenges that can arise when highly specialized scientific research is evaluated without sufficient subject-matter expertise.

The Alliance for Vision Research encourages the Office of Management and Budget to ensure that decisions affecting active research awards incorporate appropriate scientific expertise and provide meaningful opportunities for investigators and institutions to clarify the objectives, methods, anticipated outcomes, and public health significance of the research under review.

[\$200.201]

Fixed Amount Awards

The Alliance for Vision Research recognizes that fixed amount awards may be appropriate for certain projects with clearly defined deliverables and predictable costs. However, biomedical research frequently involves substantial scientific uncertainty and often requires flexibility to respond to new discoveries, evolving methodologies, recruitment challenges, technological advances, and unexpected findings.

Many forms of vision research—including basic science, translational research, clinical studies, and investigator-initiated research—are not readily suited to rigid funding structures. The Alliance for Vision Research encourages the Office of Management and Budget to ensure that federal agencies retain sufficient flexibility to utilize funding mechanisms that are appropriate for the nature of the scientific work being supported.

[\$200.333]

Fixed Amount Subawards

The Alliance for Vision Research encourages the Office of Management and Budget to carefully evaluate the administrative implications of eliminating fixed-amount subawards, particularly for multi-institutional research collaborations that are common throughout the biomedical research enterprise.

Many vision research projects involve partnerships among academic institutions, hospitals, clinical centers, nonprofit organizations, patient advocacy organizations, coordinating centers, and industry collaborators. These

partnerships are frequently essential for conducting clinical trials, recruiting sufficient patient populations, supporting translational research, and advancing scientific discovery. Modern biomedical research increasingly relies upon multidisciplinary teams whose specialized expertise often resides across multiple institutions. Flexible subaward mechanisms make these collaborations possible while reducing unnecessary administrative burden.

Fixed-amount subawards can reduce administrative burden, simplify financial management, and allow research institutions and nonprofit organizations to focus resources on scientific research and patient-centered activities rather than transactional compliance requirements. These mechanisms provide flexibility while maintaining accountability for performance and deliverables.

Eliminating fixed-amount subawards could increase administrative costs, discourage participation by smaller organizations, and create unnecessary barriers to multi-institutional collaborations that are essential to modern biomedical research.

While the Alliance for Vision Research supports appropriate accountability and stewardship of federal resources, any changes to subaward requirements should be implemented in a manner that minimizes unnecessary administrative burden and preserves the ability of institutions to collaborate efficiently.

[\$200.332]

Pass-Through Entity Requirements

The Alliance for Vision Research is concerned that the inclusion of subjective standards such as reputational risk in subrecipient oversight decisions could introduce uncertainty into collaborative research relationships.

The biomedical research enterprise depends heavily on partnerships among universities, hospitals, nonprofit organizations, research institutes, and community-based organizations. Oversight standards should be objective, transparent, measurable, and consistently applied.

The Alliance for Vision Research encourages the Office of Management and Budget to ensure that oversight decisions affecting subrecipients are grounded in objective, measurable criteria related to performance, compliance, and stewardship of federal resources. Clear and predictable standards are essential for maintaining effective scientific partnerships across the research ecosystem.

[\$200.432, \$200.454, and \$200.461]

Conferences, Publication Costs, and Dissemination of Research Findings

The Alliance for Vision Research is concerned that proposed changes affecting conference participation, professional memberships, journal subscriptions, publication costs, and dissemination of research findings could create barriers to communicating federally funded research findings.

Scientific conferences play a critical role in advancing research, fostering collaboration, training the next generation of investigators, and accelerating the translation of discoveries into clinical practice. They enable investigators to present preliminary findings, receive expert feedback, establish new collaborations, identify emerging scientific opportunities, train early-career investigators, and accelerate the translation of research into improved patient care. Requiring additional federal approval for conference participation may unintentionally impede these essential activities.

Likewise, participation in professional scientific societies and access to peer-reviewed scientific literature are integral to maintaining scientific excellence. Professional organizations provide opportunities for collaboration,

continuing education, consensus development, and dissemination of best practices that directly strengthen federally supported research.

Peer-reviewed publication remains the primary mechanism through which federally funded research is validated, shared, and made available to the broader scientific community. Publication costs, including open-access publication fees, support compliance with federal public access requirements and ensure that research findings are broadly accessible to the scientific community and the public.

Restricting these activities could disproportionately affect smaller institutions, nonprofit organizations, and emerging investigators while slowing scientific progress and reducing the return on taxpayer investment.

Scientific conferences provide far more than opportunities to present completed research. They allow investigators to receive expert feedback on preliminary findings, identify emerging scientific opportunities, establish multidisciplinary collaborations, train early-career investigators, and accelerate the translation of research into clinical practice. These interactions frequently improve ongoing research projects and foster innovations that would not otherwise occur through publication alone. Rapid dissemination of research findings accelerates improvements in patient care.

The Alliance for Vision Research encourages the Office of Management and Budget to preserve reasonable flexibility for conference participation, professional memberships, access to scientific literature, and dissemination of research findings so that federally funded research can continue to advance scientific knowledge, foster collaboration, and improve patient outcomes. Timely dissemination of research findings accelerates the translation of scientific discoveries into clinical practice and improved patient care.

[§200.332 and Related Sections]

Administrative Burden and Research Capacity

The Alliance for Vision Research is concerned that the cumulative effect of the proposed changes may increase administrative complexity for research institutions, academic medical centers, nonprofit organizations, professional societies, patient advocacy organizations, and other participants in the biomedical research enterprise.

The aggregate impact of expanded review requirements, additional compliance obligations, changes to subaward administration, increased oversight requirements, and greater uncertainty regarding award management may divert resources away from research and patient-focused activities.

Organizations supporting vision research already operate within a highly regulated environment and have invested substantially in systems designed to ensure accountability, transparency, and responsible stewardship of federal funds. Additional administrative requirements often disproportionately affect smaller institutions, emerging investigators, community-based organizations, and patient advocacy groups that provide essential expertise, patient engagement, and outreach capabilities.

The Alliance for Vision Research encourages the Office of Management and Budget to carefully evaluate the cumulative administrative burden associated with the proposed revisions and prioritize approaches that streamline grant administration while maintaining strong accountability and oversight.

Impact on the Vision Research Ecosystem and Biomedical Workforce

The Alliance for Vision Research is concerned about the cumulative effect these proposed changes could have on the vision research ecosystem, the National Eye Institute, and the broader biomedical research workforce.

Vision research has consistently demonstrated extraordinary returns on federal investment. Because the eye provides a unique and accessible window into human health, discoveries in vision science frequently contribute to advances in neuroscience, cardiovascular disease, diabetes, aging research, and other areas of medicine beyond ophthalmology.

The vision research community is already facing significant challenges, including constrained funding levels, highly competitive grant environments, workforce pressures, and uncertainty surrounding the future of federal research investments. Additional uncertainty regarding funding decisions, project continuation, collaboration requirements, review processes, and dissemination of findings could further discourage talented students, clinician-scientists, physician-scientists, and early-career investigators from pursuing careers in vision research.

Cumulative Impact Across the Research Lifecycle

While each proposed revision warrants careful consideration individually, the cumulative effect of these provisions raises even greater concern.

Collectively, the proposed rule introduces additional uncertainty at nearly every stage of the federal research lifecycle:

- Before awards through expanded political and administrative review (§200.205 and §200.206);
- During active projects through expanded termination authorities (§200.340);
- Throughout collaborative research through changes affecting subawards and pass-through entities (§200.333 and §200.332); and
- During dissemination of scientific findings through new restrictions affecting conferences, publications, and research communication (§200.432, §200.454, and §200.461).

This cumulative uncertainty may encourage institutions to become more risk-averse, discourage investigators from pursuing ambitious long-term scientific questions, reduce institutional investment in research infrastructure, and weaken the pipeline of future clinician-scientists and biomedical researchers.

Ultimately, these effects could delay scientific discovery and postpone the development of new diagnostics, treatments, and cures for patients living with blinding and vision-threatening diseases.

Recommendations

The Alliance for Vision Research respectfully recommends that the Office of Management and Budget rescind this proposed rule or at a minimum:

1. Preserve independent scientific peer review and scientific merit as the primary basis for federal research funding decisions. Any additional agency review should be limited to statutory compliance, programmatic relevance, and stewardship considerations and should not override scientific recommendations absent a clearly documented and transparent justification.
2. Ensure that any review conducted under §200.205 is governed by objective, transparent, and publicly available standards and does not introduce political considerations that could undermine scientific independence, investigator-initiated research, or public confidence in the federal research enterprise.
3. Preserve the role of specialized scientific expertise within the National Institutes of Health and maintain the value of institute-specific decision-making, including the unique role of the National Eye Institute in advancing vision research and patient care.
4. Ensure that grant oversight, suspension, and termination decisions are based on objective criteria and informed by appropriate scientific expertise.

5. Establish objective, transparent criteria and clearly defined timelines for any additional award review procedures.
6. Preserve fixed-amount subawards and other flexible funding mechanisms that support efficient research administration and multi-institutional collaboration.
7. Continue to recognize conference participation, publication, dissemination, and public access activities as essential and allowable components of federally funded research.
8. Promote stability, predictability, and long-term investment in the biomedical research ecosystem.
9. Minimize unnecessary administrative burdens that could impede scientific collaboration, increase costs, or discourage participation by research institutions, nonprofit organizations, and patient advocacy groups.
10. Ensure that oversight and risk assessment processes remain objective, measurable, transparent, and consistently applied.
11. Preserve a grantmaking framework that advances scientific excellence, innovation, accountability, public trust, and improved patient outcomes.
12. Preserve predictability throughout the federal research lifecycle by ensuring that proposal review, award administration, scientific collaboration, dissemination, and grant oversight remain grounded in objective, transparent, and scientifically informed processes.

Conclusion

The United States has achieved unparalleled leadership in biomedical research through a system built upon scientific excellence, independent peer review, specialized scientific expertise, investigator-driven discovery, and long-term investment in innovation.

The Alliance for Vision Research is particularly mindful that this success has been built through a deliberate system that combines rigorous peer review, specialized scientific expertise, investigator-initiated discovery, and the unique structure of the National Institutes of Health and its institutes and centers. The National Eye Institute exemplifies how sustained focus, deep subject-matter expertise, and strong engagement with a dedicated research community can accelerate scientific breakthroughs and improve patient outcomes.

The impact of this model can be seen in advances such as optical coherence tomography, the first FDA-approved ocular gene therapy, artificial intelligence-enabled diagnostic technologies, and numerous therapies that have transformed the prevention, diagnosis, and treatment of blinding diseases. These breakthroughs have improved the quality of life for millions of Americans while generating broader benefits across medicine, public health, and the economy.

The goals of accountability, stewardship, and alignment with national priorities are important and are already supported by longstanding processes within the National Institutes of Health and other federal research agencies. Any reforms should strengthen these proven mechanisms rather than diminish the role of scientific expertise, peer review, institute-level knowledge, scientific collaboration, and dissemination of findings that have contributed so significantly to American leadership in biomedical research.

Maintaining public confidence in the federal research enterprise requires grantmaking processes that remain transparent, predictable, and grounded in scientific excellence. For decades, the United States has built the world's leading biomedical research ecosystem through a system that emphasizes rigorous peer review, specialized expertise, accountability, collaboration, investigator-initiated discovery, and long-term investment in innovation.

The global leadership of the United States in biomedical research has been built not only through sustained federal investment, but also through a grantmaking system that is predictable, merit-based, transparent, and grounded in independent scientific expertise. Preserving those principles is essential to maintaining America's leadership in biomedical innovation, strengthening the biomedical workforce, and accelerating the development of future diagnostics, treatments, and cures for patients.

The Alliance for Vision Research respectfully urges the Office of Management and Budget to carefully consider the potential unintended consequences of the proposed rule and to revise the proposal in ways that preserve the stability, predictability, scientific integrity, specialized expertise, and collaborative framework that have made the United States the global leader in biomedical research.

Thank you for your consideration of these comments. If you have any questions or would like to discuss any of the comments above, please contact Dan Ignaszewski, Executive Director for the Alliance for Vision Research, at 202-742-1885 or Dan@eyerresearch.org. The Alliance for Vision Research welcomes the opportunity to engage further with the Office of Management and Budget, federal research agencies, and other stakeholders regarding the implementation of these proposed changes and their potential impact on the biomedical research enterprise.

Respectfully submitted,

A handwritten signature in blue ink, reading "Dan Ignaszewski". The signature is fluid and cursive, with the first name "Dan" being more prominent and the last name "Ignaszewski" following in a similar style.

Dan Ignaszewski
Executive Director
Alliance for Vision Research