COLUMBIA UNIVERSITY
IN THE CITY OF NEW YORK

OFFICE OF THE EXECUTIVE VICE PRESIDENT FOR RESEARCH

July 13, 2026

The Honorable Russell Vought
Director
Office of Management and Budget
725 17th Street, NW
Washington, DC 20503

Re: Columbia University Response to Federal Register Notice, 91 FR 32198
2 CFR Parts 1, 25, 170, 175, 176, 180, 182, 183, and 200
2 CFR subtitle B, referenced Federal agency adoptions

Submitted Electronically: https://www.regulations.gov/commenton/OMB-2026-0034-0001

Dear Director Vought:

Columbia University in the City of New York submits this letter in response to the White House Office of Management and Budget's ("OMB's") proposed revisions to 2 CFR §§ 200 et seq., Guidance for Federal Financial Assistance, published in the Federal Register Notice (Document, 2026-10817 (91 FR 32198) on May 29, 2026 ("Proposed Revisions").

Executive Summary

America's research enterprise has led to breakthroughs in science, medicine, and engineering, fueling the U.S. economy, strengthening national security, and improving the lives of millions of people. For seventy-five years, the federal government has been a critical partner in funding research in the United States, including at Columbia University. The success of this partnership draws on the unique strengths of each partner. The federal government makes strategic investments in research informed by the scientists' knowledge about groundbreaking science, disruptive technologies, and competition outside the United States. Institutions co-invest in this research, bringing institutional resources and funding to support the many costs not covered by the federal investment. The strength and the stability of this funding model have produced a research ecosystem in the United States that is the envy of the world.

Of course this partnership can be strengthened and Columbia and institutions around the country stand ready to do our part in continuing to ensure that precious federal funding is scrupulously stewarded, so that the U.S. continues to conduct the best science in the world. While the stated aims of the Proposed Revisions are important—to "improve transparency, accountability and oversight in the government-wide system of grants administration"—instead, many of the proposed approaches will undermine the fundamental principles that have sustained the success of the U.S. research ecosystem, thereby destabilizing the partnership.

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These fundamental principles include to: (1) base funding decisions on scientific merit; (2) provide a stable funding environment; (3) support lawful international collaboration; and (4) disseminate research results broadly and openly. These principles foster a thriving research enterprise and lead to scientific advances that touch everyone's lives.

Below, we first highlight some examples of the partnership's success at Columbia and then elaborate on the four critical principles undergirding it and how the Proposed Revisions put them in jeopardy.

A. Impact of the Columbia and Federal Government Partnership Supporting Our Research

At Columbia, federal funding has contributed to research breakthroughs that include: In 1951, our researchers invented a device that led to the laser, a technology now routinely used to sharpen astronomical images, to perform eye surgery, and to scan barcodes. In the 1970s, we began to uncover the biological roots of cognition, leading to our understanding of neuroplasticity, which is the basis for treating stroke patients today. In the 1990s, we pioneered video compression algorithms that led to the rise of digital television and internet streaming, spurring a new global video economy—a sector now worth hundreds of billions of dollars. Today, our researchers are developing a biological knee joint that can last a lifetime. We are programming the immune system to treat a multitude of conditions, inspired by the success with personalized immunotherapy that has already led to remissions in tens of thousands of patients with previously incurable blood cancers. And just last year we unexpectedly discovered a new 2D quantum material that could potentially lead to more energy-efficient chips that power today's AI-hungry data centers. Generations of students trained by our researchers are now leaders in academia, government, industry, and non-profits worldwide. Throughout this time, federal funding has played a vital role in energizing the success and impact of our research.

This dynamic research enterprise contributes to the economy of New York City and beyond. With about 20,000 full-time employees, Columbia University is the 11th largest private sector employer in the New York City region. Roughly 8,000 Columbia employees have salaries supported in whole or part by research grants and contracts, over 80% of whom receive some funding from the federal government. Each year, Columbia research produces hundreds of inventions, a number of which go on to spawn startups, leading to economic growth, job creation, and further scientific advancement. As a nonprofit, Columbia has consistently used license revenue from inventions developed with federal funding for seed grants, research facilities, and infrastructure, thereby investing in a vibrant environment to support further scientific work. This robust scientific environment also contributes to the health of New Yorkers and patients from all over the world. Last year, Columbia's physicians and researchers delivered care to over 470,000 patients from across the U.S., as strength in both basic and translational science informs our clinical excellence. In short, through the partnership with the U.S.

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government, Columbia research results translate directly into cutting-edge, life-saving clinical care for our patients.

Federally supported research at Columbia spans not only science, medicine, and engineering, but also those disciplines that help our nation understand complex social, historical, legal, and technological challenges and inform national economic and security policies. Our creativity in tackling research problems taps into this breadth of disciplinary perspectives.

And Columbia is just one example. Every U.S. research institution has its distinct strengths and talents. Indeed, one advantage of the federal partnership is that it supports all of these many different capabilities around the nation and enables collaborations among them. Thus, Columbia provides but one instance of success resulting from a reliable partnership with the federal government, with such success replicated across the country.

B. Four Fundamental Principles Necessary to the Partnership's Success

For the partnership to succeed—for it to produce the greatest impact —four fundamental principles must be protected. As mentioned above, these include to: (1) base funding decisions on scientific merit; (2) provide a stable funding environment; (3) support lawful international collaboration; and (4) disseminate research results broadly and openly. The Proposed Revisions undermine these principles, putting at risk future life-saving and pathbreaking research that has the potential to enrich and improve the lives of millions of Americans.

1. Merit Review is the Gold Standard for Evaluating Research Proposals

Merit review is the gold standard for deciding what scientific research is pursued in the U.S. and worldwide. The merit review process leverages the expertise of peer scientists experienced in the subject matter of the proposed research. These volunteers are charged with determining whether the proposal meets the high quality of scientific standards to warrant an award. Merit is based on the rigor and novelty of the scientific methods, the importance and potential impact of the work proposed, and the quality of the personnel and facilities to carry out the work. Judgement of merit is based on science.

As Executive Order 14281 (April 23, 2025) affirms, to "encourage[] meritocracy" and "guarantee equality of opportunity, not equal outcomes" are principles "essential to creating opportunity, encouraging achievement, and sustaining the American Dream." The Proposed Revisions themselves explain that "A merit review is an objective process of evaluating Federal award applications …."

But the pre-issuance review described in section 200.205 is anything but an objective process. The Proposed Revisions encourage and may even mandate that the pre-issuance reviewer ignore

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peer reviewer recommendations. They substitute the subjective opinion of a single senior appointee, who "must not ministerially ratify or routinely defer to the recommendations of others, but must instead use their independent judgment when evaluating Federal award proposals." (2 CFR §200.205) Moreover, the Proposed Revisions inject numerous subjective, undefined, and non-scientific factors into funding decisions such as whether the proposal is "consistent with … the national interest." Such vagueness is likely to result in inconsistent approaches across and even within agencies, within the same administration and across administrations, leading to an incoherent and chaotic funding environment. Such pre-issuance review is the antithesis of an objective review of a proposal's scientific merits.

Additionally, section 200.204 of the Proposed Revisions grants agencies the unlimited ability to select awards "on a non-competitive basis." In such a case, it is not clear what selection criteria would be used at all, opening the door even further to the issuance of awards that are based on purely subjective criteria rather than using an objective and competitive process to identify the top scientific performers and the best scientific approaches to the problem at hand. Further compounding the problem, the Proposed Revisions also grant agencies the broad discretion to withhold a funding opportunity from public announcement, if "in the national interest of the United States." In this situation, subjectively determined by the agency, potential competitors for an opportunity will not even know it exists. The best talent to carry out the task may be excluded from carrying it out. These proposed changes would damage what is currently a robust competitive selection process that results in the funding of the highest quality research.

Accordingly, Columbia requests that (1) the proposed 2 CFR §§ 200.205(b)-(d) be stricken, and (2) proposed changes to 2 CFR § 200.204(a) be revised to promote open, merit-based competition for funding opportunities as much as possible.

2. Funding Stability is Vital to Advancing Science

Scientists thrive with stable funding. For scientists to take risks and be ambitious in their research, they need a stable research environment. They can take the time and care needed to create drugs, design protocols, analyze observations, or solve problems whose impact may not be felt for years. For fear of being defunded, scientists will avoid the most innovative, high-risk, high-payoff research.

When a grantee receives a federal award, the grantee agrees that the scientist will do the work proposed during the period of the award. Researchers work to maximize scientific progress within the specified award period. Throughout this time, they create teams, develop techniques, customize equipment, conduct experiments, analyze data, share results, and build on the insights learned. They make these plans and commitments expecting that they will have the funds to support the work.

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The federal partnership relies on institutions to provide the infrastructure researchers need to carry out this work. To enable state-of-the art scientific experimentation, institutions invest in and maintain specialized facilities that may need to be vibration-free, temperature-controlled, or meet other unique requirements. This co-investment is wasted when funding is abruptly terminated. With funding uncertainty for the future, institutions will scale back their investments in the infrastructure needed to maintain a stable research environment. For Columbia, and institutions like it, this uncertainty and risk will mean curtailing investments in cutting-edge scientific instrumentation and shared facilities that help keep the U.S. at the forefront of scientific research. For example, the coldest place in New York is a lab at Columbia that creates and studies ultracold quantum systems of atoms and molecules, necessary for advances in quantum computing, sensors, and nanomaterials. Columbia would be hard pressed to invest in such facilities without stable federal funding.

Federal awards currently carry many requirements and protections to ensure that federal funds are used for the purpose proposed. The institution and researcher must comply with extensive federal rules and policies governing research integrity, financial stewardship, data management, reporting, and many other details. Under the current Uniform Guidance, where an institution or researcher fails to meet these requirements, the funding agency has the ability to impose special conditions, or even terminate the award altogether. This existing system thus ensures both that federal funds are protected and that scientists can pursue the research they proposed and that the government agreed to fund. Tremendous scientific progress has resulted from this approach.

The Proposed Revisions would destabilize this ecosystem. Section 200.340(a)(2) of the Proposed Revisions allows the federal agency to terminate an award at any time that the agency determines that such termination is in its interest or that the award does not "effectuate … the national interest." Key terms such as "national interest" are not defined, and such terminations could occur at any point in the project. Similarly, section 200.340(e) allows agencies to suspend an award for 90 days at any time, for any reason. Moreover, pursuant to section 200.342, the recipient would have no ability to object or appeal these decisions. The Proposed Revisions thus allow for terminations and suspensions that have nothing to do with whether the recipient is carrying out the project in accordance with the award terms and conditions. Rather, they allow for terminations for unpredictable, non-scientific reasons that could change at any time. Such unbridled discretion to terminate or suspend awards would inject significant financial uncertainty and risk into the U.S. scientific enterprise, and will serve only to diminish its excellence and undermine its credibility.

Additionally, the Proposed Revisions could have the unintended consequence of putting American lives at risk. Medical research is a clear example. Each year, Columbia has more than 1200 active clinical trials, affecting more than 7000 patients being treated across a diverse spectrum of diseases, including Alzheimer's, cancer, diabetes, heart disease, and Parkinson's. Abrupt terminations of ongoing projects could delay or prevent discoveries that may improve or save lives. For clinical trials involving patients who have volunteered to advance scientific

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knowledge, sudden disruptions would not only place participants at risk, but also sow public distrust in the research enterprise and the scientific community.

Similarly, Columbia relies on federal funding to help support roughly 2300 PhD students and post-docs who work in laboratories that are driving discovery and innovation in science. Stable federal funding enables these students and trainees to have consistent access to educational programs through which they can learn complex experimental techniques using sophisticated tools and technology, and develop ways of thinking that lead to independent, creative approaches to answering rigorous scientific questions. Without stable funding, scientists will establish smaller teams. If funding disappears, early-career scientists may have no choice but to drop out of doing scientific research and choose different careers. The scientific work force of the future will shrink.

Moreover, termination or suspension in the middle of a research project would waste already-spent taxpayer dollars. Researchers would have to abandon carefully-planned projects midstream. Even a short temporary pause may require redoing experiments from scratch or invalidate an on-going study, setting back progress by months or longer. A resumption of funding after a pause may mean rehiring people who were fired or training new people from scratch, wasting both time and money. A stable funding environment maximizes the return on federal research investments and enables the new discoveries and inventions that can change lives.

Accordingly, Columbia requests that the following provisions be stricken: 2 CFR § 200.340(a)(2); proposed changes to 2 CFR § 200.340(b) mandating inclusion of discretionary termination provisions in agency awards; and 2 CFR § 340(e). We request replacing these provisions with those that provide predictable criteria to allow for orderly termination, with appropriate due process, in the rare cases where it might be warranted.

3. Lawful International Collaboration Advances U.S. Priorities

Scientific progress requires collaboration: to harness the greatest talent and to pool resources that no single entity can afford alone. Such talent includes students and trainees who may join a U.S. laboratory after having trained earlier in another country. It also includes colleagues in other countries who may have synergistic programs, specialized expertise, or access to unique instruments, datasets, or patient populations. This talent and these resources enhance the U.S. research ecosystem, help stretch U.S. federal funding by affording access to resources from elsewhere, capitalize on investments made by other countries, and move science forward faster. For example, Columbia researchers collaborated with international partners to study an ultra-rare, fatal mitochondrial disease, ultimately leading to a clinical trial and the development of the first and only approved therapy for the condition. As another example, through the International Thermonuclear Experimental Reactor (ITER), Columbia researchers participate in a collaboration among 33 nations to build the world's largest magnetic fusion device.

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Collaboration helps the U.S. compete. Through collaboration, we learn about strategic priorities of other countries, we learn where the best talent in a field may be, and we learn where another country might be ahead of the U.S. in certain technologies. For example, if U.S. scientists and engineers have the design expertise in a technology, e.g., semiconductors or batteries, but manufacturing expertise is outside the U.S., with collaboration, U.S. scientists can learn from their international partners both state-of-the-art manufacturing processes and their limitations, thus opening up opportunities for further scientific advances. Without such collaborations, the U.S. hamstrings itself from achieving superiority in a given technology. Worse, as with some technologies already, the U.S. might never catch up, ceding dominance and making us reliant on other countries.

Of course, institutions must use appropriate due diligence and abide by important research security requirements and best practices with respect to foreign collaborations. However, multiple provisions in the Proposed Revisions discourage scientists from advancing their fields with the best talent and resources available in the world. For example, the Proposed Revisions require a "domestic first framework" that would permit awards to include "international elements" only with extensive justification and only where they are in the undefined "national interest." (2 CFR § 200.202(e)) OMB also seeks to prohibit outright bilateral and multilateral collaborations with a "covered foreign country" or "covered foreign entity." (2 CFR § 200.220) OMB's definitions of these terms are extremely vague and also not aligned with existing similar terminology in, e.g., the CHIPS & Science Act and other existing legislation. These new and vague requirements are likely to discourage researchers from engaging in even lawful international collaborations for their fear of not knowing what is or is not allowed. Even more importantly, the outright prohibitions of section 200.220 will impede large, global collaborations that may include participants from many countries other than the "countries of concern." All of these far-reaching provisions will chill the relationships that are crucial for scientific progress and wall off the U.S. from developments in areas where other countries may be more advanced.

Accordingly, Columbia requests that 2 CFR §§ 200.202(e) and 220 be stricken and replaced with provisions that align with existing laws and allow a risk-based approach to foreign collaborations that avoids blanket prohibitions except for the highest-risk potential engagements.

4. Dissemination of Research Findings Amplifies U.S. Science

Science advances most effectively and efficiently when results are widely shared with the scientific community. For this reason, scientists present their results at scientific meetings and conferences, receive feedback on their research, hear the presentations of others, publish their work in journals, and read the work of others. At scientific meetings, academic, industry, and government researchers have a unique opportunity to exchange and debate ideas about the latest, even nascent approaches to their problems, and form new collaborations to pursue solutions together. Without this broad sharing of discoveries, methods, and ideas, science cannot progress.

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Scientists build on past knowledge so as not to waste time and energy reinventing what is already known.

As the National Institutes of Health has stated, dissemination of federally-funded research "can accelerate future research, lead to collaboration, and allow interested readers and patients to follow the latest advances more closely. Importantly, these goals reflect NIH's commitment to the responsible stewardship of the Nation's investment in biomedical research by improving transparency and accessibility of taxpayer-funded research, an essential component of fostering trust in research." (NIH OD-25-047) Columbia agrees with these goals and commitments for research funded by any federal agency, not just NIH.

The existing system supports timely scientific exchange and expedites the advancement of science. It recognizes that researchers can judge best when, where, and how to disseminate scientific results—through publications, meetings, or some other outlet. Financial controls and requirements applicable to federal grants help ensure that costs related to these activities are appropriate.

The Proposed Revisions would disrupt the system in several ways. First, they would prohibit charging publication costs to federal awards except with prior approval from the agency, case by case. This change would erode researcher discretion over dissemination and could place the final decision in the hands of federal officials. Even more broadly, the Proposed Revisions would prohibit charging any subscriptions of any kind to federal awards, limiting access to global research results. Finally, the Proposed Revisions would also curtail attendance at scientific meetings to present and hear the most cutting-edge results, unless "expressly approved … and included in the [award's] terms and conditions." The accelerated growth of the field of computer science, including the unprecedented explosion of AI today, is due largely to technical exchange through publications presented at conferences. The Proposed Revisions will thus reduce dissemination, slow down scientific productivity, and minimize the benefit federal tax dollars would otherwise convey to the broader scientific community.

Accordingly, Columbia requests that OMB's proposed revisions to 2 CFR §§ 200.432, 200.454(a) and (b), and 200.461(a) and (b) be stricken.

Increased Administrative Burden

In addition to undermining the principles that are critical to advancing science as described above, the Proposed Revisions will significantly increase the administrative burden associated with federally funded research. For example, new requirements in section 200.305 for payment verification and justification, and in section 200.332 for subrecipient oversight, will require new and burdensome administrative tasks by researchers and institutions. Universities already operate in a comprehensive framework of accountability and oversight designed to ensure responsible stewardship of federal funds. For example, existing controls and documentation regarding the

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charging of costs to grants include, but are not limited to: a detailed budget in the proposal, approved by the agency; extensive policies and procedures required by the current Uniform Guidance; a periodic validation of personnel costs for each person charged to grants; detailed monitoring of subrecipients; and an annual, external audit of compliance with those requirements, ensuring that all requirements have been met and appropriate controls are in place.

As set forth clearly in comments submitted by COGR and others, the Proposed Revisions would impose duplicative, redundant, and new administrative burdens on researchers and institutions, without any meaningful benefit. To the contrary, the time and energy needed for administering a grant takes time and energy away from the researcher to do the actual work.

Conclusion

A regulatory framework for federal research should protect public funds while preserving the conditions that make discovery possible: merit review, funding stability, lawful international collaboration, and dissemination of results. To be sure, there may be ways to achieve meaningful improvements to our current systems, and we would strongly support engagement or efforts that aim to make a strong system of federally funded research even better. But many of the Proposed Revisions indisputably go in the wrong direction and undermine the fundamental principles that have served us well, rather than reinforcing them.

Our research enterprise has served as a powerful, dynamic engine for American innovation, national security, and economic growth. Derailing the successful partnership between the federal government and U.S. research institutions will not only hurt universities, including Columbia, but also harm American ingenuity, leadership, and our collective future.

Sincerely,

Jeannette M. Wing
Executive Vice President for Research
Professor of Computer Science
Columbia University

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