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July 8, 2026

The Honorable Russell T. Vought
Director
Office of Management and Budget
Executive Office of the President
Attention: OMB-2026-0034

Dear Director Vought,

The Association of American Cancer Institutes (AACI) is the only membership association dedicated to academic cancer centers. AACI represents more than 100 premier academic and freestanding cancer centers in the United States and Canada.

AACI member institutions conduct a substantial share of the nation's cancer research, clinical trials, and workforce training activities. AACI appreciates the opportunity to comment on OMB-2026-0034, Regulation for Federal Financial Assistance, and offers the following observations and recommendations regarding several provisions that could be detrimental to the cancer research enterprise.

Section 200.205—Federal Agency Review of Merit of Proposals

Merit review is a foundational component of the U.S. biomedical research enterprise and has been instrumental in ensuring federal research funding is awarded based on scientific merit. AACI is very concerned by the proposal's clarification that merit review is advisory. This status change, together with expanded review by senior political appointees, could reduce the role of expert scientific evaluation in award decisions. Merit review ensures that proposals have been objectively vetted by the scientific community and promotes stewardship of federal funds. This process instills confidence that U.S. taxpayer dollars are dedicated to the most promising science, as evaluated by experts in the field.

Cancer research often requires sustained, long-term investments that extend across changes in administration and policy priorities. In fact, this is how some of our greatest cancer breakthroughs have developed. The introduction of an additional review layer may slow the delivery of grant awards and create uncertainty for researchers and institutions conducting critical cancer research.

We know firsthand that delays, such as those that occurred over the last year and a half due to changes in administration and processes, hinder institutions' ability to conduct research quickly and efficiently. AACI cancer centers are still recovering from the effects of delays that began in 2025, and an additional layer of review will further impede progress against cancer.

Subjecting all grants to review by political appointees could cause further delays in grant issuance, undermining the predictable, merit-based funding system that has positioned the U.S. as a global leader in biomedical research for decades.

Section 200.340—Termination and Suspension

Cancer research depends on long-term planning, sustained investment, and a stable research workforce. AACI believes that expanded authority to terminate awards based on evolving agency priorities would introduce harmful instability into the research environment, particularly for multi-year projects that have already undergone rigorous merit review. For example, during the period of significant grant delays and cancelations in 2025, some affected awards included research on pediatric brain cancer¹ and efforts to improve cancer care for veterans². AACI firmly opposes applying a new termination standard retroactively to previously awarded grants. With research already under way, institutions and researchers are unable to properly prepare and plan for abrupt and random terminations.

This uncertainty may make it more difficult for cancer centers to recruit, retain, and support the highly skilled research workforce needed to sustain long-term scientific progress. Further, it could discourage the pursuit of innovative research that requires years of sustained effort, particularly among talented early-career researchers.

AACI encourages OMB to ensure that any termination authority includes clear criteria for deficiencies in award performance or non-compliance that would warrant early termination of an award. Scientists acting in good faith, complying with applicable policies, and making progress in line with the aims of their grant should be allowed to continue their research to completion. Furthermore, early terminations risk wasting taxpayer dollars by denying the production of final results. Appropriate safeguards and due process are needed to preserve the stability necessary for long-term biomedical research while maintaining responsible oversight of federal resources.

Sections 200.432—Conferences and 200.461—Publication Costs

AACI is concerned that requiring advance agency approval for conference participation may create additional administrative burden and uncertainty for researchers. Scientific conferences play an important role in disseminating research findings, fostering collaboration, and strengthening ongoing research through bidirectional feedback.

Researchers cannot reasonably anticipate at the time of award all scientific meetings, presentation opportunities, and collaborative activities that may arise during a grant cycle. Some researchers are also invited to fill speaking positions at the last minute, and waiting for approval would limit the ability of organizations, including AACI, to feature the best and brightest presenters. Additionally, attending meetings is critical to advancing the latest science and research in the field of oncology.

AACI is also concerned about proposed restrictions on publication costs, highlighted under Section 200.461. Together, these provisions could slow the dissemination of federally funded research findings, increase costs for research institutions, and limit opportunities for scientific collaboration, ultimately postponing the translation of scientific discoveries into improved treatments—and even cures—for patients with cancer.

We urge OMB to clarify that the publication of research findings and participation in scientific conferences, poster presentations, and other research-related meetings remain allowable expenses when connected to the goals of an award.

¹ <https://www.nytimes.com/2025/09/14/magazine/cancer-research-grants-funds-trump.html>

² <https://www.cancertherapyadvisor.com/features/cancer-research-funding-cuts/>

Sections 200.218—Disparate-Impact Liability and 200.300—Statutory and National Policy Requirements

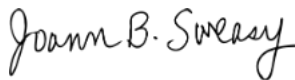
The proposed provisions related to disparate-impact liability and limitations on certain activities under federal awards may create uncertainty regarding cancer health disparities research. Cancer centers routinely conduct research examining differences in cancer incidence, access to care, treatment outcomes, and survivorship across populations. These studies are essential to understanding why differences exist and to identifying evidence-based approaches to improve outcomes for all patients. It is critical for cancer centers to have samples that reflect our heterogeneous population. No two cancers are the same, just as no two people are the same. Having the ability to collect and study a broad range of samples is critical to understanding how cancer and the treatments available impact people differently.

AACI encourages OMB to clarify that federally funded researchers may continue to collect, analyze, and report demographic and population-level data, as well as conduct research focused on barriers to cancer care, when such activities are undertaken for legitimate scientific and public health purposes. Clear guidance is crucial to ensure that life-saving cancer research is not inadvertently constrained by uncertainty regarding the scope or application of these provisions.

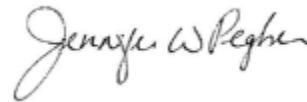
Conclusion

AACI appreciates the opportunity to provide comments on this proposed rule. We respectfully urge OMB to consider the concerns and recommendations outlined above and to revise or clarify the relevant provisions to ensure that American cancer centers can continue conducting the most innovative research in the world, advancing clinical trials, and improving outcomes for patients. We look forward to continued engagement on these important issues.

Sincerely,



Joann B. Sweasy, PhD
President, AACI



Jennifer W. Pegher, MA, MBA
Executive Director, AACI