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July 13, 2026

The Honorable Russell Vought
Mr. Andrew Reisig
Office of Management and Budget
725 17th Street NW
Washington, D.C. 20503

**Re: OMB Proposed Rule to Revise the Guidance for Federal Financial Assistance
[Docket ID OMB-2026-0034]**

Hon. Director Vought and Mr. Reisig:

The Synthetic Amorphous Silica and Silicate Industry Association (SASSI) appreciates the opportunity to comment on the Office of Management and Budget's (OMB's) proposed revisions to the Guidance for Federal Financial Assistance. SASSI represents manufacturers and suppliers of synthetic amorphous silica and silicate products used in applications that support public health, food production, sustainability, advanced materials, and industrial innovation.

While SASSI supports accountability and responsible stewardship of federal funds, we are concerned that several aspects of the proposed rule could have significant unintended consequences for scientific research, technology development, and public-private collaboration. As drafted, the proposal risks creating unnecessary administrative burdens, discouraging participation by qualified scientific and technical organizations, and undermining the collaborative research ecosystem that has historically contributed to U.S. innovation and economic competitiveness.

The proposal appears to rely on broad assumptions regarding organizational affiliations, perceived conflicts, and risk factors that may not be well-documented. Federal financial assistance programs are most effective when eligibility, oversight, and evaluation decisions are based on demonstrated performance, scientific merit, and transparent governance rather than generalized concerns about stakeholder relationships. Accordingly, SASSI urges OMB to substantially revise the proposal before finalization. Please find below our detailed concerns.

I. OMB Should Preserve Scientific Independence, Evidence-Based Research, and Legitimate Scientific Collaboration

The proposed rule could create uncertainty regarding the participation of qualified researchers, industry experts, and scientific organizations in federally supported research programs. Federal assistance programs should promote objective, evidence-based science and should not establish requirements that indirectly discourage participation by stakeholders possessing valuable technical expertise. Policies that create real or perceived barriers to participation risk weakening the quality, diversity, and practical relevance of federally funded research.

The proposed rule also raises concerns that legitimate collaborations among industry, academia, nonprofit organizations, government institutions, and international research partners could be subjected to heightened scrutiny based on broad assumptions rather than objective evidence of waste, misuse, or lack of accountability. These partnerships are often essential to advancing scientific research, translating discoveries into practical applications, and achieving federal program objectives. Public-private and international collaborations routinely provide access to specialized expertise, research infrastructure, and technical capabilities that strengthen the quality and impact of federally supported activities.

While SASSI supports appropriate safeguards to protect research integrity, national security, and the responsible use of federal funds, such guardrails must be narrowly tailored and risk-based. Overly restrictive requirements or vague standards could discourage participation by qualified organizations, impede scientific progress, and reduce opportunities for collaboration with trusted domestic and international partners. Participation in industry-supported organizations, professional associations, collaborative research initiatives, or transparent international scientific activities should not be viewed as an indicator of elevated risk absent clear and objective parameters and findings.

Thus, SASSI urges OMB to revise the proposal to ensure that evidence-based research and legitimate scientific collaboration is preserved while focusing oversight measures on demonstrable risks rather than perceived affiliations or relationships.

II. OMB Should Avoid Restrictive Approaches that Limit Funding Flexibility

The proposal could constrain agencies' ability to utilize funding mechanisms that are well suited for research, demonstration projects, technical development, and educational initiatives.

Excessive procedural requirements and restrictive oversight measures may increase administrative costs while reducing program effectiveness. OMB should avoid imposing additional constraints that limit agencies' ability to tailor funding approaches to the needs of specific programs and recipients.

III. OMB Should Protect Merit-Based Review and Support Public Dissemination of Federally Funded Research

Funding decisions should be based primarily on scientific merit, technical qualifications, programmatic relevance, and demonstrated capability. Elements of the proposal could introduce considerations that detract from objective evaluation criteria and create uncertainty for applicants regarding how proposals will be assessed. OMB should revise the rule to ensure that merit review remains the central determinant of funding decisions.

Equally important is the need to preserve the public communication of research results. The proposed changes could create uncertainty regarding the allowability or support of publication, communication, and dissemination activities associated with federally funded research. The public derives value from federal research investments only when research findings can be effectively communicated and subjected to public and scientific scrutiny. OMB should ensure that dissemination activities remain fully supportable and avoid policies that could discourage publication, stakeholder engagement, or scientific exchange.

In conclusion, SASSI believes that the proposed rule, as currently drafted, could undermine key objectives of federal financial assistance programs by discouraging participation, increasing administrative complexity, and creating uncertainty for research organizations, universities, nonprofit institutions, and industry collaborators. Rather than strengthening scientific outcomes, several provisions risk limiting the very collaborations and knowledge-sharing activities that have historically contributed to American innovation and competitiveness.

For these reasons, SASSI urges OMB to substantially revise the proposal before issuing a final rule. Any final guidance should be narrowly tailored, evidence-based, and focused on addressing demonstrable risks without imposing unnecessary burdens on legitimate scientific research and collaboration. Failure to make these changes could reduce participation in federal programs, diminish research effectiveness, and ultimately weaken the return on federal investments in science and technology.

Thank you for your consideration of these comments.

Sincerely,

Candy Reynolds-Cummings
Chair

Joel Carpenter
Executive Director