

July 9, 2026

Submitted electronically via Regulations.gov

The Honorable Russell T. Vought
Director
Office of Management and Budget
Executive Office of the President
725 17th Street NW
Washington, DC 20503

Re: Comments on Proposed Rule, Regulation for Federal Financial Assistance (OMB-2026-0034)

Dear Director Vought:

On behalf of the Entomological Society of America (ESA), we appreciate the opportunity to provide comments on the Office of Management and Budget's proposed revisions to the Uniform Guidance governing federal financial assistance.

Our organization represents approximately 7,000 scientists, educators, extension professionals, students, and practitioners dedicated to advancing the understanding of insects and related arthropods and applying that knowledge to address challenges affecting food security and agricultural competitiveness, public health preparedness, natural resource management, biodiversity conservation, and workforce development.

We support the goals of transparency, accountability, and responsible stewardship of taxpayer resources. However, several provisions of the proposed rule would significantly weaken the Nation's capacity to anticipate, prevent, and respond to emerging biological threats of an entomological nature. Entomology is a mission-critical discipline that underpins agricultural productivity, food security, vector-borne disease prevention, invasive species management, pollinator health, ecosystem resilience, and biodiversity conservation. The proposed changes would reduce the effectiveness of the scientific infrastructure that supports these activities and diminish the workforce pipeline needed to address future challenges.

Impacts on Agricultural Security, Public Health, and Scientific Capacity

The United States faces increasing threats from invasive insect pests, emerging vector-borne diseases, pollinator declines, and environmental change. Recent examples include the increasing spread of invasive agricultural pests, mosquito-borne diseases, tick-borne illnesses, and accelerating pressures on pollinator populations that support agricultural production and ecosystem services.

Addressing these threats requires:

- Long-term research programs that generate reliable data across multiple years
- Rapid dissemination of findings among researchers, regulators, producers, public-health officials, and stakeholders
- National and international collaboration among experts

- Professional societies that convene experts, establish scientific standards, publish scientific findings, and provide training and
- A robust pipeline of future scientists, extension specialists, and public-health professionals.

The U.S. Department of Agriculture (USDA) has identified “Farmers First,” “Farm Security is National Security,” and “Make America Healthy Again,” as three of its top five priorities for this Administration. It is impossible to achieve those objectives without understanding that the research and development that accomplishes those objectives occurs upstream through collaboration between the federal government, research institutions, and industry partnerships—and the scientific societies who help bring all three together.

The federally funded research enterprise in this country has driven domestic agricultural, health, and economic security, making the U.S. the envy of the world in terms of productivity and competitiveness. Central to those outcomes is the relationship between research funded by federal agencies like the USDA, National Institutes of Health (NIH), National Science Foundation (NSF), and others so universities can conduct the work the government lacks the capacity or the creativity to do itself. To that end, by creating interference in the existing practices, several provisions to this proposed rule would subsequently undermine food security, public health, national security and preparedness, and economic and intellectual competitiveness.

Conference Attendance Pre-Approval (§200.432)

The proposed requirement that conference attendance be explicitly approved and incorporated into award terms would create substantial barriers to scientific exchange.

For entomologists, scientific meetings are not ancillary activities. They are essential operational components of the research enterprise. Conferences facilitate:

- Rapid dissemination of information regarding invasive species detections and third-party validation of function or failure of commercial pest management products for agricultural producers, structural pest management, and vector control
- Coordination among federal, state, university, and industry partners responding to agricultural threats
- Exchange of surveillance and management strategies for vector-borne diseases
- Training of graduate students and early-career scientists and
- Development of collaborative responses to emerging outbreaks.

Many emerging insect and arthropod threats evolve rapidly and unpredictably. Requiring conference participation to be anticipated years in advance at the time of award issuance is impractical and inconsistent with how scientific response networks operate.

The burden would fall particularly heavily on students, postdoctoral researchers, extension personnel, and scientists at smaller or traditionally less well-funded institutions, reducing opportunities for professional development and weakening the future STEM workforce.

Recommendation: Retain conference participation as an allowable cost subject to existing standards of reasonableness and allocability.

Restrictions on Memberships and Professional Activities (§200.454)

Professional scientific societies provide critical infrastructure that federal agencies do not independently maintain.

ESA supports:

- Peer-review networks
- Scientific journals
- Professional certification and continuing education opportunities
- Mentoring, workforce, and leadership development opportunities
- Coordination among research, regulatory, and extension communities.

Restricting the allowability of memberships and professional activities would undermine the organizations that facilitate dissemination and application of federally funded research. Scientific societies serve as force multipliers for federal investments. Weakening these organizations would diminish the return on taxpayer-supported research.

Recommendation: Preserve the allowability of professional memberships and society participation that directly support federally funded scientific activities.

Publication Costs (\$200.461)

The proposed restrictions on publication costs would hinder dissemination of federally funded research.

Entomological research often informs urgent decisions affecting:

- Agricultural pest management
- Invasive species response
- Pollinator conservation
- Mosquito and tick control programs
- Public health preparedness.

The value of research is realized only when findings are communicated and available to decision-makers, researchers, producers, and public-health officials. Limiting publication support would slow scientific communication, reduce visibility of federally funded research, and create barriers for early-career investigators and researchers at resource-constrained institutions. Furthermore, scientific publication is not a discretionary activity; it is a core component of the research process and a necessary mechanism for transparency, validation, and public accountability.

Recommendation: Continue to recognize publication costs as allowable research expenses.

Review of Funding Recipients Based on Affiliations and Memberships (\$200.206)

The proposed expansion of risk-assessment criteria raises concerns regarding scientific collaboration and participation in legitimate professional organizations.

Scientific progress depends on researchers engaging with broad networks of experts across institutions, disciplines, and sectors. Membership in scientific societies should be viewed as evidence of professional engagement and commitment to scientific standards rather than as a source of administrative risk. Overly broad interpretations of organizational affiliation criteria could discourage participation in professional communities that are essential to maintaining scientific rigor and advancing federally supported research.

Recommendation: Ensure risk assessments remain focused on objective indicators of financial and administrative performance rather than routine participation in legitimate scientific organizations.

New Requirements for Award Approval (§200.205)

The proposed expansion of political review authority raises concerns regarding the long-standing merit-review framework that has contributed substantially to U.S. scientific leadership and significantly reduces transparency.

Entomological research frequently addresses threats that emerge unexpectedly and require specialized expertise. The most effective mechanism for identifying high-priority scientific investments has historically been expert peer review. Federal support for research addressing invasive species, vector-borne disease transmission, pollinator health, and agricultural resilience should continue to be guided principally by scientific merit, technical feasibility, and public benefit. Maintaining confidence in the research enterprise requires transparent, expert-driven evaluation processes. This has been the “gold standard” that has driven American research productivity and economic competitiveness, making us the envy of the world, for nearly a century.

Recommendation: Preserve independent merit review as the primary basis for research funding decisions.

Expanded Termination Authority (§200.340)

Entomological research often requires long time horizons. Projects may involve multi-year field studies, insect population monitoring, longitudinal disease surveillance, assessment of invasive species establishment and spread, and the evaluation of management interventions across seasons and geographic regions.

Expanded authority to terminate awards based on evolving priorities creates uncertainty that discourages institutions from undertaking long-term research efforts. Such uncertainty threatens the continuity of datasets and monitoring programs that are often essential for detecting emerging threats before they become widespread and costly. The resulting loss of scientific continuity would reduce the effectiveness of federal investments and diminish preparedness for future agricultural and public health challenges.

Recommendation: Limit termination authority to clearly defined circumstances identified in award terms and preserve appropriate procedural safeguards.

Barriers to International Collaboration (§200.220)

Insects, arthropods, and the diseases they transmit do not recognize national borders.

International collaboration is frequently necessary to:

- Track invasive species before introduction into the United States
- Study emerging vector-borne pathogens
- Develop early warning systems
- Compare management strategies across regions
- Protect agricultural production and food systems.

Many of the most significant agricultural and public-health threats originate outside U.S. borders. Restricting scientific collaboration may reduce access to critical information needed for prevention and preparedness. Appropriately tailored safeguards can address national-security concerns without broadly limiting legitimate scientific cooperation.

Recommendation: Maintain risk-based approaches that protect national interests while preserving essential international scientific collaboration.

Broader Impact on the Entomology and STEM Workforce Pipeline

The cumulative effect of these provisions extends beyond individual grants. The proposed changes would reduce opportunities for:

- Student participation in scientific meetings
- Early career researcher development
- Professional networking and mentoring
- Publication and dissemination of research findings funded by taxpayers
- Engagement with scientific societies.

These activities collectively form the foundation of the entomology workforce pipeline.

At a time when the Nation faces growing challenges related to invasive species, agricultural resilience, vector-borne diseases, biodiversity loss, and food security, policies that constrain scientific training and professional development risk creating shortages of the expertise needed to respond to future threats. Federal investments in research produce their greatest return when they support not only individual projects but also the scientific infrastructure and workforce that sustain long-term innovation and preparedness.

The entomological sciences provide essential capabilities that protect U.S. agriculture, public health, biodiversity, and economic security. The proposed revisions to the Uniform Guidance would weaken key components of the research ecosystem that enable these capabilities, including scientific communication, professional societies, merit-based funding, long-term research continuity, and workforce development.

We respectfully urge OMB to revise the proposed rule to preserve the scientific infrastructure necessary for maintaining American leadership in agricultural protection, vector-borne disease preparedness, invasive species management, biodiversity conservation, and STEM workforce development. If you have any specific questions, please don't hesitate to contact Dr. Erin Cadwalader, ESA's Director of Strategic Leadership and Policy, at ecadwalader@entsoc.org or 240-696-3746.

Thank you for your consideration of these comments.

Sincerely,



Melissa W. Siebert, Ph.D., BCE
2026 President, Entomological Society of America