

PSA guidance regarding the proposed OMB revision of CFR Part 200

COMMENT DEADLINE	PRIMARY ACTION	WHO SHOULD READ THIS
July 13, 2026	Submit section-specific comments to the OMB docket	NJIT Faculty, Research Professors, Lecturers, and Professors of Practice

On June 15, Provost Pelesko issued a memo making NJIT Faculty, Research Professors, Lecturers and Professors of Practice aware of the proposed Office of Management and Budget (OMB) rewrite of 2 CFR Part 200. His memo asks each of us to consider submitting a comment to the official registry detailing the potential impacts of the proposed rule changes.

The official OMB proposal describes a government-wide revision of federal financial assistance rules affecting grants, cooperative agreements, and related awards across major agencies including NSF, NIH/HHS, DOE, DoD, DHS, EPA, NASA, and the Department of Education.

You can read the comprehensive [Federal Register: Regulation for Federal Financial Assistance](#) filing. Formal feedback can be submitted here at <https://www.regulations.gov/document/OMB-2026-0034-0001>. The deadline for submitting comments is July 13, 2026.

With AI assistance, the PSA has summarized 15 key areas of Broad Concern. Specific sections of the proposed new rules are indicated in the righthand column.

We also refer you to the “[Save American Science](#)” webpage of Rutgers AAUP-AFT where you will find resources to help in preparing feedback on the proposed regulations. In addition, please look out for correspondence from relevant professional societies as many of them are urging their members to act.

The most useful way for you to comment is to connect these broad categories to concrete NJIT impacts: delayed or lost graduate support, disrupted labs, narrowed research topics, restrictions on international collaboration, increased administrative burden, publication and conference barriers, uncertainty in promotion and tenure records, and the risk that active grants become unstable during the performance of the grant’s work.

15 Areas of Broad Concern

Areas of Broad Concern	High-Level Explanation
1. OMB Authority and the Shift from Guidance to Regulation	The proposal would move the Uniform Guidance toward a more binding Uniform Grants Regulation, giving OMB a stronger government-wide role in setting federal grant rules across

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	agencies. For PIs, this means agency-specific flexibility may narrow, and federal award rules may become more centralized, uniform, and enforceable across the full grant lifecycle. Key sections: 2 CFR Part 1; §§ 200.101, 200.106, 200.110.
2. Political Review, Agency Priorities, and Peer Review	Senior agency appointees will review discretionary awards for consistency with law, agency priorities, presidential policy priorities, and the national interest, while peer review recommendations would remain advisory only. This is a significant departure from traditional peer-review-centered funding culture because a strong scientific score may no longer be sufficient if the proposal is judged inconsistent with current policy priorities. Key sections: §§ 200.202, 200.204, 200.205.
3. Applicant Risk, Institutional Affiliation, and Eligibility Screening	Agencies would have broader authority to evaluate applicant risk, including prior performance, affiliations, foreign gifts or contracts, and institutional factors. PIs should be aware that award decisions may be affected not only by the proposal itself, but also by institutional profile, partners, subrecipients, centers, affiliations, or compliance history. Key sections: §§ 200.112, 200.206, 200.213.
4. Elimination of Fixed-Amount Awards and Fixed-Amount Subawards	PIs would generally no longer be able to propose or receive fixed-amount awards or issue fixed-amount subawards unless specifically authorized by federal statute. This matters because fixed-amount mechanisms have often been useful for milestone-based, lower-administration, training, pilot, or partnership-based work; their elimination would push more projects into actual-cost reimbursement and heavier financial oversight. Key sections: §§ 200.1, 200.101, 200.201, 200.333.
5. Active Award Termination and Suspension Risk	Federal awards would have to include termination provisions allowing agencies or pass-through entities to terminate awards for discretionary reasons, including when an award no longer aligns with program goals, agency priorities, or the national interest. PIs should assume active awards may become less stable and should maintain contingency plans for graduate students, postdocs, staff, subawards, equipment, fieldwork, and other long-term commitments. Key sections: §§ 200.211, 200.340, 200.341, 200.342, 200.343.
6. Mid-Award Conditions and Moving Compliance Targets	Agencies would be able to add or remove specific award conditions during the period of performance, including added reporting, prior approvals, reimbursement-only payment structures, technical assistance requirements, or site visits. PIs should be aware that award conditions may change mid-project and could restrict spending, hiring, subawards, travel, or research activities after the award has already begun. Key sections: §§ 200.208, 200.211, 200.329, 200.339.

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7. Payment Requests, Technical Justifications, and Performance Reporting	Payment requests would require written justifications explaining the purpose of the payment and the award-related work it supports once systems are in place. PIs may be asked to provide more technical or milestone-based narrative to support drawdowns or reimbursements, creating reporting obligations beyond ordinary progress reports. Key sections: §§ 200.305, 200.329.
8. Covered Foreign Collaborations and International Research Oversight	Federal funds could not be used to support covered collaborations with covered foreign countries (e.g. Russia, Iran, China or North Korea) or covered foreign entities unless an exception applies. PIs should treat international partnerships, travel, hosting researchers, technical assistance, data sharing, and subawards as higher-review activities when covered countries or entities may be involved. Key section: § 200.220; related sections: §§ 200.206, 200.300, 200.336.
9. DEI/DEIA, Gender, Disparate-Impact, and National Policy Restrictions	The proposal includes new or revised restrictions involving DEI/DEIA, “gender ideology,” disparate-impact theories, and other national-policy requirements. PIs should be alert that proposal language, research topics, outreach, training, student-success activities, community-engaged work, and public-facing project descriptions may require closer review when charged to federal awards. Key sections: §§ 200.218, 200.219, 200.300.
10. E-Verify and Grant-Funded Personnel Compliance	Recipients and subrecipients would have to use DHS E-Verify for employees and contractors hired in or performing work in the United States under a federal award. PIs should expect more coordination with HR, SRO, General Counsel, and project administrators for grant-funded staff, student workers, postdocs, contractors, and subrecipient personnel. Key section: § 200.303.
11. Subawards, Cost-Reimbursement Contracts, Pass-Through Duties, and SAM.gov Reporting	The proposal would mandate greater subaward reporting, pass-through monitoring, related-entity classification, and SAM.gov reporting, while strongly discouraging cost-reimbursement contracts unless the agency is notified and a written justification is maintained. PIs using subcontracts, subawards, centers, affiliates, municipalities, companies, or university partners should expect more front-end classification, justification, and monitoring. Key sections: §§ 200.320, 200.329, 200.331, 200.332, 200.333.
12. Conference Travel and Research Meetings	Costs for attending conferences would be allowable only if participation is expressly approved by the agency and included in the award terms and conditions. PIs should not assume that unexpected conference travel can be added later without agency approval or an award amendment, and conference needs should be planned explicitly at proposal stage. Key sections: §§ 200.432, 200.475.
13. Publications, Open Access, Page Charges,	Publication costs, including APCs, page charges, and open-access fees, would be unallowable unless required by statute or approved

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Memberships, and Subscriptions	in advance by the agency on a case-by-case basis; professional memberships would require prior approval and subscriptions would generally be unallowable. PIs should explicitly budget and request approval for publication and professional costs at proposal stage, especially where agency open-access mandates may conflict with proposed cost restrictions. Key sections: §§ 200.407, 200.454, 200.461.
14. Public Outreach, Communications, Lobbying, and Issue Advocacy	Advertising, public relations, selling and marketing, lobbying, issue advocacy, voter registration activity, and public messaging unrelated to the award would face tighter allowability limits. PIs doing public scholarship, community-engaged research, policy communication, outreach, or dissemination to non-academic audiences should ensure those activities are clearly tied to award objectives and costed appropriately. Key sections: §§ 200.421, 200.450, 200.467.
15. Procurement, Domestic Preferences, Prohibited Equipment, Records, Audits, and Administrative Burden	The proposal would add or revise requirements involving prohibited equipment, unmanned aircraft systems, domestic procurement preferences, domestic record storage, Do Not Pay checks, audits, cost principles, and compliance documentation. Even where these appear “administrative,” they can affect research purchasing, fieldwork equipment, vendors, data storage, reimbursements, audits, and the day-to-day ability to manage awards. Key sections: §§ 200.216, 200.318, 200.320, 200.322, 200.336, 200.400, 200.503, 200.513, 200.514.