

July 13, 2026

Andrew Reisig

Joel Savary

OMB Office of Federal Financial Management

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RE: ANS Comments on OMB-2026-0034, Regulation for Federal Financial Assistance

Dear Mr. Reisig and Mr. Savary:

The American Nuclear Society (ANS) represents the nuclear professional community – serving as the premier nonprofit organization for those who embrace nuclear science and technology for their vital contributions to improving people’s lives and preserving the planet. ANS membership is open to all, and current membership consists of individuals from all walks of life, including engineers, doctors, students, educators, scientists, military service members, advocates, government employees, and others.

Founded in 1954, when the amended Atomic Energy Act opened the door to civilian nuclear applications, ANS serves as the forum for scientific exchange across America's nuclear sector – fostering technical collaboration, hosting scientific meetings, and publishing peer-reviewed research to guide the development of nuclear technologies, from energy, medicine, and healthcare to agriculture, industry, and space exploration. ANS remains committed to advancing, fostering, and promoting the development and application of nuclear sciences and technologies to benefit society.

On behalf of our more than 12,000 members, ANS is pleased to provide comments on the proposed rule “Regulation for Federal Financial Assistance” – specifically, multiple sections of 2 CFR related to the dissemination of research and the award processes related to federal grants, cooperative agreements, and conference attendance. ANS also appreciates the time and effort the Office of Management and Budget (OMB) put into the proposed rules referenced in our response.

The proposals released by OMB could have significant implications for the effectiveness of federal research investments, U.S. competitiveness, independent scientific inquiry, and the long-term sustainability of technical associations like ANS. More specifically, these changes could reduce the ability of organizations like ANS to develop and publish the technical, professional, and educational resources – including journals, books,

standards, and conference proceedings – that foster innovation, support outreach across the nuclear community, and advance the Trump Administration's objectives for deploying nuclear technology both domestically and internationally.

Conference participation and technical exchange (§ 200.432 – Conferences)

ANS's national and topical conferences, student conferences, and technical workshops are central to the exchange of nuclear science and engineering knowledge. The proposed revisions to § 200.432 would increase agency oversight of conference attendance and related costs, which could reduce participation by federally funded researchers and students. Because many ANS presenters are supported by DOE, NNSA, NRC, NSF, and other federal awards, these changes may limit opportunities for collaboration and the dissemination of research across universities, national laboratories, industry, and government.

Scientific publishing and ANS journals (§ 200.461 – Publication and printing costs)

ANS publishes leading peer-reviewed journals that serve the nuclear research community. The proposed revisions to § 200.461 would make publication costs – including page charges, article processing charges, and open-access fees – generally unallowable unless specifically authorized. Because a portion of U.S. nuclear research is federally funded, these changes could make it more difficult to publish research, reduce manuscript submissions, and complicate compliance with federal public-access requirements. They may also lessen the visibility and impact of federally supported research and create challenges for scientific societies and publishers that support the research enterprise.

Federal research funding and merit review (§ 200.205 – Federal agency review of merit of proposals)

ANS members depend on a strong federal nuclear R&D ecosystem. Proposed changes to § 200.205 would increase agency leadership involvement in funding decisions while reducing the role of traditional peer review. Maintaining expert technical evaluation is essential to advancing research in areas such as reactors, fuel cycles, fusion, materials, safeguards, and nonproliferation. Changes to merit review that invite undue political influence or introduce non-technical criteria could stifle, weaken, and warp the scope of U.S. nuclear scientific leadership and U.S. contributions to discovery and innovation in the field.

Foreign collaboration and international engagement (§§ 200.206, 200.208, 200.218–200.220)

The proposed rule would expand oversight of foreign collaborations and allow agencies to impose additional restrictions on funded activities. While protecting national interests is important, these provisions could make international scientific collaboration more challenging. ANS provides an important forum for U.S. and international researchers to exchange technical information, and maintaining appropriate opportunities for collaboration supports both scientific progress and U.S. leadership.

Award stability and long-term research (§§ 200.340–200.343)

The proposed rule would expand agency authority to suspend or terminate awards based on changing priorities. Because nuclear research often requires long development timelines, specialized facilities, and sustained investments in personnel and infrastructure, greater uncertainty around award continuity could make long-term planning more difficult for research institutions and the workforce they support. It could also be argued that certain long-term research decisions could be reversed at the discretion of any future Administration.

Workforce development and student engagement (§§ 200.204–200.211)

ANS is committed to supporting students, early-career professionals, and the future nuclear workforce. If the proposed changes increase administrative requirements or alter award conditions, universities may face additional challenges in supporting graduate research and student participation in federally funded projects. Sustained investment in education, research, and workforce development remains essential to meeting the nation's growing energy, national security, and technology needs. As recognized in the Administration's May 2025 Executive Orders supporting the expansion of nuclear energy, continued federal support for nuclear R&D and workforce development will be critical to maintaining U.S. leadership in nuclear technology and ensuring a strong pipeline of skilled professionals.

In closing, for reasons discussed above, ANS opposes the promulgation of proposed rules mentioned in their current form. ANS is hopeful the OMB takes our comments into account when going through final rule adjustments and that OMB reconsiders aforementioned items which could create obstacles for the U.S. nuclear science and technology community. If you have questions, please contact ANS Director of Public Policy, John Starkey: jstarkey@ans.org.

Cc: Russ Vought
Director
Office of Management and Budget