

Re: Comments of the Society for Industrial and Applied Mathematics (SIAM) on the Proposed Rule, *Regulation for Federal Financial Assistance*

Docket No. OMB-2026-0034; RIN 0348-AB81 (lead)

91 Fed. Reg. 32198 (proposed May 29, 2026); Comment Deadline: July 13, 2026

Proposed Effective Date: October 1, 2026

Introduction and Statement of Interest

The Society for Industrial and Applied Mathematics (SIAM) is an international community of 14,000 individual members. Almost 500 academic, manufacturing, research and development, service and consulting organizations, government, and military organizations worldwide are institutional members. Our members come from many different disciplines but have a common interest in applying mathematics in partnership with computational science to advance emerging technologies and tackle critical research challenges across sectors. Through publications, workforce development, research, and community building, the mission of SIAM is to build cooperation between mathematics and the worlds of industry, science, and technology. SIAM appreciates the opportunity to comment on the Proposed Rule for the Regulation for Federal Financial Assistance but is concerned with several of the proposals that would harm the U.S. research ecosystem and global competitiveness. The Proposed Rule provides sweeping changes to the current research infrastructure and SIAM is particularly concerned about changes to allowable costs, restrictions on international collaboration, program development and grant management, and the increased authority of the Office of Management and Budget (OMB). To address our concerns, SIAM provides comments on the following sections of the Proposed Rule: § 200.202, § 200.205, § 200.220, § 200.340, § 200.432, § 200.454, and § 200.461.

I. Changes in Agency Authority

Within 2 C.F.R. § 1.105, the current Uniform Guidance states that it “is guidance, not regulation.” The proposed update’s change to a Regulation for Federal Financial Assistance elevates the guidance to a regulation. This change would unilaterally elevate the Office of Management and Budget’s authority and disregard the joint responsibility of OMB and the 41 federal departments and agencies. As it now stands, agencies conduct their own rulemaking to codify amendments to the Uniform Guidance to best fit their needs on an individual basis. The Proposed Rule would significantly hinder agencies and institutions’ ability to provide input prior to implementation. The change would also make it easier to shift policies, leaving researchers with less certainty. Greater uncertainty will cause inefficiencies in the systems, make it harder to hire and support students, and weaken the competitive abilities of the United States’ ecosystem. This change is inconsistent with the *Administrative Procedure Act* (APA) and exceeds OMB’s statutory authority.

II. Weakened Focus on Scientific Merit and Mission Needs in Program Development and Grant Selection (§ 200.205, § 200.340)

SIAM is concerned by the proposal that all discretionary awards must be reviewed by a political appointee who must then evaluate an award based on criteria such as demonstration of Administration policy priorities and “anti-American values.” This weakens the development of federal programs by changing the focus from supporting the best science and meeting agency needs to advancing Administration priorities and ancillary considerations. OMB should require that

any review of federal grants be by an individual with the necessary expertise to evaluate the scientific quality, public importance, and long-term value of the research.

As a scientific society, SIAM is already working to safeguard scientific standards and address fraud, misconduct, and reproducibility. SIAM is a member of the STM Integrity Hub and has integrated its various research integrity tools into its editorial workflow. Additionally, SIAM has been using an industry-standard plagiarism checker for more than a decade. SIAM has a regularly updated set of policies regarding research integrity (e.g., Editorial Policy on Artificial Intelligence, Authorial Integrity in Scientific Publication), which authors, editors, and reviewers must follow. Finally, SIAM addresses any identified issues by publishing retractions and errata where appropriate.

To address reproducibility, so far three SIAM journals allow authors to request reproducibility badges. Authors who make their code and data available on a permanent public repository or via SIAM Journal on Scientific Computing (SISC) supplementary materials may request a "SISC Reproducibility Badge: Code and Data Available" at the time of manuscript submission. More than 220 SIAM papers have received the badge so far. These are examples of ways SIAM, and many other organizations are addressing these critical issues. Rather than relying on broad assessments of entire institutions, the government should direct its oversight and resources toward targeted measures that effectively strengthen research integrity, transparency, and reproducibility.

Furthermore, SIAM is concerned by the proposal to broaden agencies' ability to terminate awards with limited explanation and no ability to appeal the termination. The Proposed Rule includes the vague criterion of "national interest" to support the suspension or termination of an award. This discourages researchers, faculty, and institutions from investing in their own research and research infrastructure when there are increased chances of receiving terminations with no appeal. Research institutions require stability and predictable funding to operate and conduct cutting-edge research. This change would harm the trust between federal funders and recipients and weaken U.S. global competitiveness.

III. Making Unallowable Costs that Underpin the Research Ecosystem and Collaboration (§ 200.432, § 200.454, and § 200.461)

SIAM is concerned by several of the Proposed Rule changes that negatively impact the research ecosystem, and particularly harm scientific societies. For many scientific societies, conferences are an opportunity for researchers to share knowledge and collaborate within their field, create new connections that many times lead to developing collaborative proposals, and enrich the future of the field by supporting student growth. SIAM hosts approximately 15 scientific conferences and 16 regional meetings worldwide, attracting approximately 8,500 participants each year. SIAM's conferences are centered around various application areas for industrial and applied mathematics, including AI and scientific machine learning, quantum information science, advanced computing, national security, biotechnology, data science, and more. For SIAM to successfully deliver its conferences, it relies on federal support from key science agencies. By requiring advance approval to use federal funds for conference attendance, the rule will reduce participation in scientific conferences. It is unrealistic for grant awardees to be able to identify every conference they plan to attend over the duration of their grant at the time of signing the terms of awards. As a result, researchers may be unable to use grant funds to attend conferences, reducing opportunities for collaboration and the dissemination of research findings.

SIAM currently subsidizes student attendance, and we may be forced to increase registration fees to support conference operations if federal support for conference participation is curtailed.

SIAM is also concerned about the proposed changes that restrict allowable costs for journal subscriptions and publishing fees. High-quality publishing is essential to dissemination of research results and underpins the research ecosystem. SIAM works to provide strong value through its journals and publishes premier content across countless fields related to computing, AI, quantum, and other topics of interest to the current Administration. SIAM has more than 250 U.S. institutional subscribers that would be at a scientific disadvantage because of their lack of access to current research and scientific advances in their field if they can no longer be reimbursed for the costs of subscriptions.

SIAM is also one of relatively few publishers that allows Green Open Access options for researchers to comply with federal open access mandates. This has helped many researchers avoid paying article processing charges (APCs). Subscriptions underlie the model that enables this arrangement, which is very advantageous to the taxpayer and individual researchers. If these subscriptions collapse under the increased financial burden that this rule would create, SIAM would be greatly disadvantaged compared to large foreign competitors that charge high APCs and the research community would suffer from reduced access to high-quality information.

SIAM also objects to the non-allowability of APCs although these are not core to the SIAM business model. Publication has real costs that will not disappear by making them unallowable. Instead, the burden will be shifted, and researchers will be put in the untenable situation of having to comply with government mandates which the government is not willing to fund. SIAM also calls on OMB to rescind the 2022 memo that required immediate open access which if left in place with this regulation, would create an untenable situation for researchers, institutions, and publishers.

IV. Stifling Scientific Progress by Adding Barriers to International Collaboration (§ 200.202, § 200.220)

The rule proposes a new America First framework for new government programs that may limit collaborative agency partnerships. It also bans collaborations with covered foreign countries, but, as written, this prohibition is vaguely worded, and SIAM is concerned that it could inadvertently restrict or discourage legitimate international scientific collaborations beyond what is necessary to protect U.S. national security.

Since the early days of the aerospace industry, advances in industrial and applied mathematics in the United States do not occur in isolation. They depend on collaboration with leading experts around the world and access to data, knowledge, and research partnerships that transcend national borders. SIAM brings together researchers and practitioners from academia, industry, and government across the globe to address some of the most challenging problems in science, engineering, and technology. Broad restrictions on both bilateral and multilateral collaborations would not only limit engagement with entities in countries of concern but could also hinder collaboration with allies and partners who recognize the value of participating in a global scientific ecosystem. Such restrictions risk isolating U.S.-based researchers from international networks that drive innovation and scientific progress. As a result, non-American researchers will

increasingly look to collaborate with the leading geopolitical competitors of America, thereby strengthening the latter's influence on international networks just as America's leadership position weakens.

Moreover, industrial and applied mathematicians work on problems that are inherently global in nature and often require shared data, coordinated research efforts, and international expertise. These include improving energy systems, strengthening supply chains, optimizing telecommunications networks, advancing biotechnology, and understanding financial markets. Progress in these areas depends on the ability of researchers to collaborate across borders.

Restricting international collaboration and reducing access to global data and valuable expertise would put the U.S. research enterprise at a serious disadvantage. It would weaken U.S. competitiveness and undermine the United States' longstanding leadership in science and technology.

Respectfully submitted,

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