



August 24, 2026

Mr. Brian Stone
Chief of Staff, Performing the duties of the NSF Director
The National Science Foundation
Randolph Building
401 Dulany Street Alexandria, VA 22314

Re: Comments on National Science Foundation Proposal/Award Information – NSF
Guidance on Financial Assistance (NSF-2026-OTR-0001)

Dear Mr. Stone:

The American Lung Association appreciates the opportunity to comment on the National Science Foundation's (NSF) proposed changes to the Guidance on Financial Assistance. Our organization's mission is to save lives by improving lung health and preventing lung disease, and we have a 120-year history of advancing lung health for people across the nation. Scientific research like that advanced by NSF is critical for achieving this mission. However, we are concerned that the stated purpose of aligning the NSF guidance with the proposed revisions of the Office of Management and Budget's Uniform Guidance could have harmful impacts on the critical research NSF funding advances. Our organization commented to OMB to express grave concerns about the potential impacts of this rule on the nation's ability to invest in lifesaving medical research, protect communities from chemicals and contaminants that harm the lungs, and sustain the public health programming and infrastructure that helps children and adults avoid preventable illness and live healthier lives. Furthermore, knowing that OMB is currently reviewing thousands of submitted comments on its proposal, and that no final rule has been issued, we are concerned that incorporating the proposed guidance is premature.

Investments from the federal government, simply put, save lives. Federal financial assistance is the mechanism through which Congress' investments are translated into scientific discoveries, healthier communities and lifesaving public health programs across the country.

We highlight the following concerns with the OMB proposal, and therefore with these provisions' incorporation into NSF's guidance:

NSF's investments play an important role in addressing lung disease, both at the individual and environmental levels. For example, NSF-supported research into

forecasting and mitigating wildland fire and deadly wildfire smoke; how novel infectious diseases spread; and how technology can support new drug development can all help to improve lung health for the patients and communities our organization serves. Additionally, NSF grants help ensure that the nation has the infrastructure and workforce needed to address these personal and public health threats to the lungs for the long term.

We are concerned that the OMB proposal would allow any presidential administration, now or in the future, to cancel grants that they deem no longer advance their priorities, with no recourse for grantees. This could have a profound impact on research studies. For example, for biomedical research, this exposes researchers and participants to enormous risk. This type of research often requires multiple years to complete, making it highly likely that biomedical research endeavors will cross between presidential administrations. If an administration decides that a project no longer serves their priorities for any reason, years of scientific progress toward cures and treatments for diseases could be wiped away. Abruptly ending ongoing research also risks wasting years of federal investment in research infrastructure and data collection before meaningful scientific conclusions can be reached.

Further, the proposal would require decisions on funding to be made at the political appointee level, which for scientific research would be a departure from the current practice of grant applications undergoing peer review by scientists who understand the field. The peer review stage would instead be limited to an advisory opinion. This creates a situation in which a political appointee with limited knowledge of a specific scientific field is responsible for deciding which research proposals have the most scientific merit. Further, it could disincentivize scientists from participating in the advisory peer review stage at all if their review may not actually be relevant in the ultimate decision on whether to award funds. This is not to say that there is not room for improvement in the peer review process, or that scientific merit needs to be the only factor in awarding federal funds for research, but these changes and considerations of other factors should strengthen the existing system rather than supersede it.

Adding this layer of political review would also entrench delays in funding. Researchers in the Lung Association's network have noted already that delays in federal funding have caused them to end or forego partnerships.

In addition to its broad, harmful implications for scientific research, the proposal contains additional provisions on funding that would make the acts of carrying out, discussing and publishing federally funded research more difficult.

Research does not exist in a vacuum; ensuring scientists can discuss and publish their findings is essential to translating these findings into real-world impact. These activities also allow researchers to validate findings, identify collaborators, avoid duplicative work

and accelerate the development of breakthroughs. We appreciate that the proposal allows applicants to continue to use funding to attend conferences, but we are concerned that the proposed changes restrict conference attendance unless it is written into the award when it is first issued. Given the long timeline of research grants, this may effectively dramatically limit conference attendance, as the most appropriate future conferences may not be planned or calendared at the time the award is issued.

The proposal would also prohibit the use of funding for research to be published in journals. However, publication is crucial to ensuring that federally funded research is disseminated beyond the researcher.

The proposal also restricts funding for international collaboration. While assuring that federal funds do not further national security risks is an important part of the oversight of these funds, we are concerned that the very broad provisions in the proposal would restrict scientific collaboration in a way that further undermines the development of new treatments and cures. Biomedical research relies on collaborations that bring together specialized expertise, unique patient populations and technical capabilities that do not always exist within a single institution or country. These collaborations have played an important role in advancing treatments for complex diseases, including lung disease.

Researchers have also expressed concern about the implications of this proposal for the workforce. In the short term, hiring for immediate research opportunities is already a challenge with uncertain or unpredictable funding cycles, which could be exacerbated with increased uncertainty under this proposal. Over the long term, if research funding opportunities become less stable, experts may leave the scientific field altogether. This has particularly profound implications for early-career researchers.

NSF's portfolio of research is critical and foundational, and it offers enormous benefits for people's ability to lead healthier lives with healthier lungs. We urge you not to incorporate the proposed OMB revisions into the Guidance on Financial Assistance. Doing so is not only premature, but it has the potential to create lasting harm by undermining the very research NSF funds.