The RNA Society is an international non-profit organization incorporated in the United States dedicated to advancing RNA research and education. The Society is home to 2,022 scientists (53% of whom are affiliated with US institutions) working in academic, government, and industry laboratories to advance fundamental knowledge of RNA biology and to translate this knowledge into technologies and medicines.

Among its core functions, the RNA Society hosts an annual research conference that provides RNA scientists a forum in which to present their emerging research. The Society also publishes the peer-reviewed professional journal "*RNA*", read by leading scientists around the globe. Through these and other programs, the Society helps scientists validate and refine their work, establish interdisciplinary collaborations, network with other RNA researchers, and receive training and mentorship to improve their skills as researchers. These essential functions help develop the next generation of scientists that will invent new technologies, improve agriculture, and find new cures for disease. The proposed amendments in Docket OMB-2026-0034 will dramatically undermine the RNA Society's ability to support scientific discovery. They will create far reaching, damaging consequences for US scientists, and for the advancement of science in the US and beyond. As such, the RNA Society hereby voices its strong opposition to proposed rules changes in Docket OMB-2026-0034 and highlights foreseeable implications below.

Section §200.454: Memberships, subscriptions, and professional activity costs

> *(a) Costs of the recipient's or subrecipient's membership in professional, civic, business, and technical organizations are allowable if necessary to fulfill the award requirements. Such costs must receive prior written approval of the Federal agency.*
>
> *(b) Costs of the recipient's or subrecipient's subscriptions to business, professional, academic, and technical periodicals are unallowable.*

Changes proposed here will prohibit professional society membership costs without prior written approval from the funding agency, and completely disallow costs associated with academic journal subscriptions. This section impedes US scientists' access to auxiliary training, professional development, and career opportunities provided through the RNA Society, especially for junior researchers. Additionally, limiting subscriptions to scientific journals inhibits knowledge transfer – increasing the nonproductive use of funding to repeat research that is already published. Moreover, this rule further burdens academic libraries that are experiencing historic funding cuts and reductions in holdings.

Section §200.461: Publication and printing costs

> *(a) In general. Except as provided in paragraph (b) of this section, publication costs (including page charges, article processing charges (APCs), or similar fees such as open access fees for professional journal publications and other peer-reviewed publications) are unallowable under Federal awards. Printing costs (including distribution and general handling) are allowable.*
>
> *(b) Exceptions. The only exceptions to paragraph (a) of this section are for publication costs that are specifically required by Federal statute or approved in advance by the Federal agency on a case-by-case basis. A general requirement to make results publicly available must not be construed as authorizing publication costs.*

This amendment makes it harder for US-based scientists to maintain compliance with federal policy on Open Access publishing mandated by the memorandum from the Office of Science and Technology Policy on August 25, 2022. The amendment overlooks the true financial costs associated with reviewing and publishing scientific research. These changes will ultimately lead to the shuttering of scientific journals and not-for-profit publishing houses such as Cold Spring Harbor Laboratory Press, which publishes several journals including "*RNA*". The impact of this section on RNA researchers in the US is particularly alarming,

as 67 of 135 articles published in "*RNA*" in 2025 were submitted from US-affiliated researchers (of which, 39 [58%] were published fully Open Access).

Section §200.432: Conferences

> *(b) The costs for attending conferences are allowable only if participation in the conference is expressly approved by the Federal agency and included in the terms and conditions of the Federal award.*

This section limits participation in conferences to those pre-authorized before the start of an award (which typically spans 4-5 years). Scientific conferences are not announced, and meeting locations are not secured, this far in advance. For example, the RNA Society only recently announced the dates and venue for our 2028 meeting and has just begun planning for 2029. This proposed rule makes it impossible for researchers to attend conferences not yet announced before the award begins. Importantly, the rule eliminates the ability of scientists to exercise flexibility in *when* and to *what audience* to share their latest findings. Given the dynamic nature of research advances, it is not possible to know when the work will be ready to present at a meeting. The proposed amendment will limit the participation by US researchers and scientific trainees in the RNA Society Annual Meeting—where, in 2025, 739 US-based scientists shared their work (including 435 graduate and undergraduate students, post-doctoral associates, and early-career researchers who represent the future of RNA science in the US).

Section §200.205: Federal agency merit review of proposals

> *(b) Pre-issuance review. As part of the merit review process, Federal agencies must perform pre-issuance reviews to ensure that Federal award proposals selected for funding are consistent with applicable law, Federal agency priorities, and the national interest.*
>
> *(1) Discretionary awards must, where applicable, demonstrably advance the President's policy priorities.*

Research priorities should be selected based upon potential for high scientific impact and must remain flexible to adapt to new discoveries. It is inappropriate to prioritize funding of research that advances a President's policy priorities, especially if that area of research has been soundly disproved. Moreover, most federal awards that support scientific research last longer than one Presidential term, and award notices are infrequently aligned with the election cycle. As such, it is impossible to know how Presidential policy priorities will shift during the term of the award.

> *(2) Discretionary awards must not be used to fund, promote, encourage, subsidize, or facilitate:*
>
> > *(i) Racial preferences or other forms of racial discrimination by the recipient, including activities where race or intentional proxies for race will be used as a selection criterion for employment or program participation;*
> >
> > *(ii) Denial by the recipient of the sex binary in humans or the notion that sex is a chosen or mutable*
> >
> > *(iv) Any other initiatives that compromise public safety or promote anti-American values.*

This language will enable discrimination by disallowing research into existing, scientifically validated disparities in health outcomes, disease progression, and health care access between people of different biological sexes and racial backgrounds. This language is inconsistent with established biological and medical understanding of sex variation, including intersex conditions, and could discourage legitimate research on sex differences and health disparities. We support sensible safety regulations to ensure no harm is done to the public through the conduct of research projects, but we strongly disagree with the language *"promote anti-American values"*. This language is unscientific and could be interpreted in different ways by different individuals.

(8) See also §§ 200.202(c) and 200.300.

(c) Procedure for pre-issuance review. When conducting a pre-issuance review, senior appointees (or their designee) must not ministerially ratify or routinely defer to the recommendations of others, but must instead use their independent judgment when evaluating Federal award proposals.

(d) Use of peer review. Nothing in this part must be construed to discourage or prevent the use of peer review methods to evaluate proposals for discretionary awards or otherwise inform agency decision making, provided that peer review recommendations remain advisory and are not ministerially ratified, routinely deferred to, or otherwise treated as de facto binding by senior appointees or their designees. Further, nothing in this part must be construed to create any rights to any particular level of review or consideration for any funding applicant except as consistent with applicable law.

Researchers active in their respective fields have the best understanding of which projects have the most transformative potential. Peer review by experts trained in research remains the best way to ensure that robust, rigorous, and impactful science receives federal support. By relegating existing peer review to a perfunctory advisory capacity—and subjecting excellent proposals to a policy alignment check—we lose the meaning of peer review, we lose time, and we create the potential for avoidable costly mistakes made by non-specialists who do not understand the proposed work.

Section §200.340: Termination and Suspension

(a) Termination provisions. The Federal award may be terminated in part or its entirety as follows:

(2) At the discretion of the Federal agency or pass-through entity. The Federal agency or pass-through entity, to the extent permitted by law, may terminate a Federal award in part or its entirety if the Federal agency or pass-through entity determines that a termination is in the interest of the Federal agency or pass-through entity, including if a Federal award does not effectuate program goals, Federal agency priorities, or the national interest as they exist at the time of the termination.

The proposed amendment includes language that would enable any federal award to be terminated at any time for any reason if it is deemed not in "the national interest", a term whose interpretation is highly variable, not scientifically defined, and yet dependent on scientific knowledge." Political appointees will terminate otherwise compliant and productive projects with no reasonable scientific or statutory justification. Federal awards support a wide variety of research programs, pay for the salaries of researchers, equipment, and other real costs associated with the project. Abrupt termination of awards is wasteful and disruptive because work in progress cannot be completed, reagents and supplies could be wasted, and in some cases the data being gathered during long-term experiments will be rendered meaningless. Jobs will be terminated with little notice, and the investment made in launching the project and collecting preliminary data will be wasted.

Section §200.202: Prohibition of using federal funds for covered foreign collaborations

(a) General prohibition. *Except as provided in paragraph (c) of this section, Federal funds may not be obligated or expended by a recipient or subrecipient to support a bilateral or multilateral collaboration, agreement, program, or activity with a covered foreign country or covered foreign entity.*

(b) Scope. *The prohibition in paragraph (a) of this section applies regardless of whether Federal funds are used for direct programmatic activities, research, technical assistance, travel, or indirect costs allocable to such collaborations.*

(d) Definitions. For purposes of this section:

(1) Covered foreign country *means any country designated by statute, Executive order, or other Federal law as: (i) A foreign adversary; (ii) A country of particular concern; or (iii) A country subject to sanctions or restrictions relating to national security, defense, or intelligence activities.*

(2) Covered foreign entity means: (i) An entity owned or controlled by, or acting on behalf of, a covered foreign country; (ii) An entity identified as an "entity of particular concern" on a list maintained by a Federal agency pursuant to statute (including lists maintained under a National Defense Authorization Act or the International Emergency Economic Powers Act); or (iii) An entity affiliated with the military, intelligence, or security services of a covered foreign country.

The proposed amendment prohibits collaborations with covered foreign countries and entities, including many countries that share valuable resources and provide material support to our scientists. History proves that new discoveries can be made anywhere, by any scientist, from any country. Interfering with our ability to collaborate across geographical boundaries for political reasons will deter the open exchange of ideas and sharing of unique research materials that help US researchers make new discoveries that ultimately benefit the US. The amendment would also prohibit access of US researchers to low-cost support services that enable increased research output despite the high inflation and reduced funding.

Section §200.202: Program planning and design

(a) Elements of program design. *The Federal agency must design a Federal program and create an Assistance Listing before announcing the Notice of Funding Opportunity. A Federal program must be designed:*

(1) With clear goals and objectives that: (i) Aim to achieve meaningful results; (ii) Are consistent with the public purpose of the program as authorized by law; and (iii) Align with administration policies and priorities;

The language in clause (iii) creates a problem because administration policies and priorities frequently shift on a time scale that is not conducive to research, as described above.

(c) Federal agencies must ensure that Federal program funds are not used to promote, subsidize, or support political activities or initiatives unrelated to authorized public purposes, such as political advocacy, lobbying, or any attempt to influence legislation, elections, or government officials. Federal programs should be developed to avoid even the appearance of supporting such prohibited activities to ensure that all activities performed under Federal awards are authorized by law.

The final statement in this amendment violates the first amendment rights of researchers. Holding a federal award should not bar researchers from speaking their mind about political matters on their own time and using their own resources. There is no reasonable way to avoid "even the appearance" of engaging in "prohibited activities" without giving up freedom of speech.

(2) When designing research and development programs, and evaluating applications, Federal agencies must apply a domestic-first framework, under which international elements may be included only if the Federal agency determines that such elements are justified, consistent with program objectives, and in the national interest of the United States.

This amendment ignores the broad value of international collaborations to accelerate new discoveries and promote public health outcomes in the US. Outstanding science is performed in many countries, and when scientists work together they can tackle difficult problems that might not be possible when geographically constrained. For example, when new outbreaks of infectious disease emerge, the country of origin may be distant from the United States. Collaboration between researchers in the United States

and foreign countries allows researchers in the United States to track the outbreak, develop strategies to mitigate the spread, and devise therapeutics to ensure that new pandemics do not materialize.

The OMB proposal, if enacted, will not only directly impact the work of the RNA Society, but will suppress scientific freedom, place barriers to the open exchange of scientific ideas, and supplant accepted peer review practices with political oversight that will negatively impact scientific rigor and reproducibility. The proposal represents an unprecedented interference in science and will disrupt well-established and highly productive models for assessing, funding, and supporting scientific research in the US. The impact will not only reach researchers, educators and trainees who dedicate their careers to scientific research, but also every US citizen who benefits from their discoveries.

On March 17, 2026, the RNA Society adopted a set of five value statements. The changes proposed in Docket OMB-2026-0034 violate our values in multiple ways. By mandating political oversight of research subjects, they suppress scientific freedom, reducing opportunities for discovery. By restricting collaboration between peers from different countries, they block the open exchange of ideas that drives progress. By replacing well established scientific peer review with political surveillance, they are at odds with accepted practices that ensure rigor and reproducibility. The RNA Society stands by its values, and strongly opposes the amendments described in OMB-2026-0034. For these reasons, the RNA Society urges OMB to abandon the proposed rule changes.