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Public Comment of the American Crystallographic Association

Re: OMB-2026-0034 – Proposed Revisions to the Uniform Guidance (2 CFR Part 200)

To Whom It May Concern:

The American Crystallographic Association (ACA) appreciates the opportunity to comment on the Office of Management and Budget's proposed revisions to the Uniform Guidance. The ACA is an international scientific society representing researchers in crystallography, structural biology, chemistry, materials science, physics, mineralogy, and related disciplines. Our members conduct federally funded research at universities, national laboratories, nonprofit research institutions, government laboratories, and private industry throughout the United States and around the world.

The ACA supports responsible stewardship of taxpayer dollars and recognizes the importance of transparency, accountability, and consistency in the administration of federal financial assistance. We respectfully offer the following observations regarding how the proposed revisions may affect the nation's research enterprise and the institutions that conduct federally supported research.

Many ACA members rely on long-term federal support for crystallographic instrumentation, synchrotron and neutron user facilities, structural biology, materials characterization, and interdisciplinary collaborations that often span multiple institutions and several years. The stability and predictability of federal research funding and administration are therefore essential to the scientific work conducted by our community.

Section 200.205 – Merit Review and Award Decisions

The ACA is concerned that several proposed revisions could expand the role of considerations outside established scientific merit review in funding decisions.

For decades, federal agencies have relied on rigorous, independent peer review conducted by subject matter experts to evaluate scientific proposals. This process provides an objective assessment of scientific merit, feasibility, innovation, and potential impact while helping ensure that federal research investments support the highest-quality science and maintain public confidence in the integrity of the award process.

While federal agencies must retain the authority to ensure awards comply with applicable laws and regulations, scientific merit, as determined through independent expert peer review, should remain the primary basis for evaluating scientific research proposals. The ACA respectfully

recommends that OMB clarify that independent scientific peer review remains the principal mechanism for evaluating research proposals and that any additional review considerations should supplement—not replace—expert scientific assessment.

Section 200.340 – Termination of Federal Awards

The ACA is concerned that the proposed revisions may broaden the circumstances under which federal research awards may be modified or terminated.

Crystallographic and structural science research frequently involves multi-year projects requiring sustained access to national user facilities, specialized instrumentation, computational resources, and collaborations among universities, national laboratories, nonprofit institutions, and industry partners. Institutions make hiring decisions, invest in research infrastructure, and establish long-term collaborations with the expectation that awarded grants will remain in effect as long as recipients comply with the terms and conditions of the award.

Expanding discretionary authority to terminate awards for broadly defined reasons may create uncertainty that could disrupt ongoing research, discourage innovative projects, and affect students, postdoctoral researchers, and research staff whose work depends on stable funding.

The ACA recommends that award termination continue to be based on clearly defined and objective standards, including recipient noncompliance, failure to meet award requirements, or statutory authority.

Administrative Burden

OMB requested comments on opportunities to reduce administrative burden. The ACA strongly supports continued efforts to simplify grant administration while maintaining appropriate accountability.

Researchers devote substantial time to administrative and compliance activities that reduce the time available for conducting research, mentoring students, preparing publications, training the next generation of scientists, and pursuing new scientific discoveries. We encourage OMB to evaluate whether any new reporting or documentation requirements provide measurable improvements in oversight that justify the additional burden placed on investigators and recipient institutions.

Whenever possible, OMB should seek opportunities to simplify reporting requirements, reduce duplication among federal agencies, promote consistency in grant administration, and eliminate unnecessary administrative requirements.

Importance of Predictability

Scientific research depends upon stability, transparency, and predictability. Major research initiatives often extend over several years and involve collaborations among universities, nonprofit organizations, federal laboratories, industry partners, and shared national research facilities.

For many areas of crystallography and structural science, research depends on sustained access to national user facilities, highly specialized instrumentation, and long-term collaborative networks. Predictable grant administration enables institutions to recruit talented researchers, invest in infrastructure, support students and trainees, and pursue ambitious scientific questions that ultimately benefit science, medicine, technology, and the public.

The ACA respectfully recommends that OMB preserve the stability and predictability that have long supported the success of the United States research enterprise while implementing any final revisions to the Uniform Guidance.

Conclusion

The American Crystallographic Association appreciates the opportunity to provide comments on the proposed revisions to the Uniform Guidance. We support responsible stewardship of federal funds and believe accountability and scientific excellence are complementary goals. We respectfully recommend that OMB preserve the central role of independent scientific peer review, maintain clear and objective standards governing award administration, minimize unnecessary administrative burden, and continue engaging the research community as these revisions move forward.

Thank you for your consideration of these comments.

Respectfully submitted on behalf of the American Crystallographic Association.