

OMB Submission

Public Comment on Docket OMB-2026-0034
Regulation for Federal Financial Assistance

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Individual comment
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[200.340] [200.205]

In the current budget cycle Project BioShield, the program that develops and stockpiles the medical countermeasures the United States would reach for during a biological attack, loses about one hundred million dollars. At first glance that looks like ordinary belt-tightening, money pulled from one account toward some harder-edged priority downstream. It is not. In the same window, total federal biodefense funding falls from a request near fifty-three billion dollars to about twenty-seven billion, and this proposed rule places the continuity of nearly every federally funded research program under the discretion of political appointees.¹ We are not moving resources from the laboratory to some arsenal. We are drawing down both at once, and anyone who thinks about national security rather than any single administration should find that alarming.

None of this is new ground. When Vannevar Bush handed President Truman his report *Science, the Endless Frontier* in 1945, the blueprint that produced the National Science Foundation, he was making a bet that American *military* primacy would rest on American *scientific* primacy. The record is not subtle. Radar and the proximity fuze decided battles. The mRNA platform behind a vaccine delivered in months started as basic research no one had marked as urgent. You cannot know in advance which line of inquiry becomes a countermeasure twenty years out. That is why the postwar bargain left the direction of research to the people doing it and funded it steadily across the years that scientific discovery takes.

This proposed rule breaks that bargain in three specific and technical ways. § 200.340, implementing Executive Order 14332, would require every discretionary grant government-wide to permit termination whenever an agency decides the award no longer serves “Federal agency priorities” or “the national interest”, which the rule specifies are set by whoever is “politically accountable at the national level”. A power agencies could once choose to include becomes mandatory, and it ties active research to the priorities of the sitting administration. § 200.205 installs political appointees to review awards before issuance and instructs them not to defer to scientific peer judgment, which flies directly in the face of the Truman bargain where the people best placed to steer scientific inquiry toward American military primacy are the experts themselves. And every award must demonstrably advance a sitting administration’s policy priorities. A research program that can be ended for any reason at any moment is not a research program. It is a leash.

The same rule restricts funding for foreign organizations and discourages the international collaboration that has staffed American research and defense laboratories for decades. Half of the advanced-degree scientists in America’s defense industrial base are foreign-born, against about a third outside it.² Push them out and the bench thins, the pipeline narrows, and the quiet advantage no adversary could buy walks out the door. For a century the flow ran the other way and the world’s best came here. This rule reverses it.

¹Federal biodefense totals and the Project BioShield reduction are drawn from the Council on Strategic Risks, Biodefense Budget Breakdown (FY26 request of \$27.025 billion against an FY25 request of \$53.386 billion).

²Institute for Progress, “Meeting U.S. Defense Science and Engineering Workforce Needs” (Neufeld 2022; Nice and O’Brien 2025), finding roughly 50 percent of advanced STEM workers in the U.S. defense industrial base are foreign-born, versus 34 percent outside it; see also National Science Board, Science and Engineering Indicators 2024 (foreign-born individuals are 19 percent of STEM workers and 43 percent of doctorate-level scientists and engineers).

I will be plain about my angle. I served in the U.S. Army as a combat veteran in Afghanistan and now work as a computational scientist. What follows is a national-security argument, not a partisan one, and a claim about capability, not entitlement. It is worth being precise about where the money actually goes, and where it does not. The Council on Strategic Risks has documented that biodefense spending does not grow proportionately even when the defense budget itself rises, so the comforting assumption that these cuts are a redirection toward security does not survive contact with the numbers.³

Scientific velocity is the right way to see the stakes, and the hundred million leaving Project BioShield is the least of it. This velocity is the momentum of three to four generations of disciplined, grueling work, knowledge extracted the hard way and compounded. It can be bled out in a single budget cycle by putting political friction on the laboratory while thinning the shield, and once lost it does not return on any timeline a rival power would ever grant us. No foreign adversary could design a more efficient way to erode the American edge than to politicize the laboratory and thin the defense on the same schedule.

I ask that § 200.205 and § 200.340, and the requirement that federally funded research demonstrably advance the priorities of whichever administration holds office, be withdrawn. None of this places science above accountability. The return the American taxpayer earns deserves a hard look, and I intend to give it one, elsewhere. But that is a different argument. American science does not owe its strength to the priorities of sitting officials. It owes it to the country. It owes it to the American people.

Thank you for your time,
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³Council on Strategic Risks, analysis of the FY26 and FY27 President's Budget Requests for biodefense.