



Public Comment Submission Docket No.: OMB-2026-0034

Date: June 12, 2026

From: International Association for Great Lakes Research (IAGLR)

Re: Comments on OMB's Proposed Federal Financial Assistance Rule (Changes to 2 CFR Part 200)

Executive Summary

The International Association for Great Lakes Research (IAGLR) submits these comments in strong opposition to the significant regulatory changes proposed by the Office of Management and Budget (OMB) under Docket OMB-2026-0034.

IAGLR has advanced large lake ecosystem research since our founding activities in the 1950s, with formal incorporation as a nonprofit scientific organization in 1967. We represent hundreds of scientists, researchers, resource managers, and policymakers whose work relies on stable federal funding mechanisms.

We are deeply concerned that these proposed changes will undermine the integrity of federal science funding, stifle essential scientific collaboration, and diminish U.S. leadership in scientific excellence. Crucially, these rules threaten our capacity to protect the Great Lakes ecosystem—a vital natural resource that provides drinking water for more than 40 million people in the U.S. and Canada, directly generates more than 1.5 million jobs and about \$60 billion in annual wages, and anchors a \$6 trillion regional economy across the eight Great Lakes states and two Canadian provinces. Without robust peer review and collaborative frameworks, the quality of research that underpins these economic benefits and the evidence-based stewardship required for this transnational resource are at risk.

Impact on Great Lakes Research and Stewardship

The Laurentian Great Lakes contain about 21% of the world's surface freshwater and support ecosystems of global importance. Decades of federal investments have produced critical successes, including:

- Successful phosphorus reduction programs that reversed eutrophication in the 1970s–1990s.
- Early detection and rapid response systems for invasive species like sea lamprey and zebra mussels.
- Climate change impact assessments informing adaptive management strategies.
- Toxics remediation priorities guiding billions of dollars in cleanup investments.
- Sophisticated forecasting systems for weather, waves, and harmful algal blooms that protect commercial shipping, recreation, and human health.

Disrupting the funding mechanisms that support this work threatens achievements built over multiple generations. These proposed rules would affect federal financial assistance—including grants, cooperative

agreements, and other collaborative instruments—supporting Great Lakes research. The timing of these changes (effective October 1, 2026) coincides with critical decision-making periods for Great Lakes Restoration Initiative reauthorization, binational agreement renewals, and climate resilience planning.

Furthermore, effective stewardship requires the integration of diverse knowledge systems. Across the Great Lakes region, Indigenous knowledge and community-based knowledge complement Western scientific approaches, providing a more comprehensive understanding of ecosystem dynamics and leading to more resilient resource management decisions. By imposing barriers on collaboration, data sharing, and access to literature, these proposed restrictions do not solely affect academic institutions; they risk undermining the capacity to integrate essential local and traditional knowledge, thereby weakening the collective ability to address complex transboundary environmental challenges.

Specific Concerns

1. Political Interference in Peer Review (§200.205)

The requirement that political appointees conduct "pre-issuance review" of every discretionary award, with explicit prohibition against deferring to peer reviewers, represents a fundamental departure from the system that has enabled American scientific success since World War II.

For Great Lakes research specifically, independent peer review has been essential in identifying the most pressing questions—from phosphorus loading in Lake Erie to invasive species impacts across all five Great Lakes. Removing this system introduces political bias into funding decisions, substituting subjectivity where objectivity must prevail. Career program officers possess the necessary understanding of aquatic science, climate resilience, and ecological monitoring—the intricacies of which political appointees cannot reasonably be expected to grasp without extensive technical training.

2. Conference Attendance Restrictions (§200.432)

IAGLR's flagship event, the Conference on Great Lakes Research, brings together more than 800 participants from around the world each year. This gathering is vital for scientists to present preliminary findings, receive peer critique, discover new methodological approaches, and build the collaborations that advance their fields. However, conference programs are determined only six months prior to the events and would not be known at the time of application for federal grants when authorization to attend must be requested under the proposed rules.

Under the proposed rule, requiring express agency pre-approval for conference attendance creates significant impediments including:

- **Timing delays:** Scientists may miss critical deadlines for abstract submissions or travel arrangements
- **Selective isolation:** Political gatekeepers could prevent researchers studying sensitive topics (e.g., pollution sources, climate change effects) from participating
- **Collaboration disruption:** Cross-institutional partnerships central to large-scale Great Lakes monitoring become more difficult

This restriction directly contradicts decades of evidence demonstrating that scientific progress depends on open exchange and scholarly communication.

3. Professional Memberships and Subscriptions (§200.454)

Making professional society memberships allowable only with prior written approval, and rendering subscriptions to academic journals categorically unallowable, is particularly detrimental to the scientific community. Researchers must stay current with published literature to conduct meaningful work. Requiring case-by-case justification for journal access creates administrative burden and risks isolating scientists from their field's latest developments.

Furthermore, the *Journal of Great Lakes Research*, which IAGLR publishes, would face reduced readership if federal grantees cannot access it through their grants. This would severely undermine the dissemination of critical research on large lake ecosystems.

4. Undefined "Gold Standard Science" Standard

The rule's repeated invocation of "Gold Standard Science," tied to Executive Order 14303, creates a troubling framework of administrative discretion rather than scientific rigor. Because the standard remains undefined in any concrete or measurable way, it gives the administration broad latitude to favor or disfavor institutions based on subjective criteria rather than objective scientific merit. For environmental science research on the Great Lakes, which addresses complex management challenges including water quality modeling, ecological restoration, and climate adaptation, there is no single methodology that constitutes a "gold standard." Scientific innovation often comes from diverse approaches and competing hypotheses. By repeatedly citing an undefined benchmark, the rule introduces ambiguity that allows political gatekeeping to masquerade as quality control, ultimately stifling the methodological diversity essential for solving complex ecological problems.

5. Indefinite Grant Termination Authority (§200.340)

The provision allowing active awards to be terminated at any time, for any reason, creates unacceptable uncertainty for multi-year research projects. Great Lakes research frequently requires long-term datasets spanning multiple years or even decades to detect trends in water levels, temperature changes, or fish and invasive species population dynamics. Suddenly terminating funding mid-project destroys investment in data collection equipment, personnel, and collaborative infrastructure. Such instability discourages the long-term commitments required for effective ecosystem stewardship.

6. Elimination of Agency Flexibility

Binding all agencies to a single implementation date removes individual science agencies' ability to adapt OMB guidance to their specific missions. Agencies that support Great Lakes research, including EPA, NOAA, USGS, and NSF, have developed nuanced implementation rules appropriate for their distinct programs. A one-size-fits-all approach ignores legitimate differences between social science research, engineering research, biological monitoring, and policy analysis, potentially hindering mission-specific objectives.

7. Undermining Open Science and the Journal of Great Lakes Research (§200.361 & §200.454)

A critical, yet potentially overlooked, consequence of these proposed changes concerns the dissemination of scientific results, specifically impacting peer-reviewed journals like IAGLR's *Journal of Great Lakes Research* (JGLR).

The proposed rule creates a contradictory environment for scientific communication:

- **Restricted Access to Literature:** By categorically rendering funding for subscriptions to academic and technical journals unallowable under §200.454, the rule effectively cuts off federal grantees from the very literature necessary to conduct their research. If researchers cannot subscribe to JGLR or other primary sources using grant funds, they become dependent solely on open-access articles that may be incomplete or behind paywalls they cannot afford to bypass. This fragmentation slows discovery and limits the ability of scientists to build upon prior work—a cornerstone of the scientific method.
- **Threat to Sustainable Publishing Models:** While federal agencies increasingly mandate open access (OA) to publications resulting from federally funded research, many high-quality journals, including JGLR, rely on subscription revenues, library partnerships, and institutional support to maintain rigorous peer review, editorial standards, and long-term archiving. The new restrictions on membership and subscription costs destabilize this ecosystem. If grant-funded institutions can no longer purchase essential journal access, we risk a "death spiral" for society-run journals that serve niche but critical fields like large lake science. This could force a shift toward predatory publishing models or eliminate vital venues for specialized research that do not have the commercial appeal of broader disciplines.
- **Contradiction with OA Mandates:** The rule appears to undermine the practical execution of existing Open Access mandates (such as the OSTP Nelson Memo). If grantees are prohibited from accessing the latest research findings via traditional subscription channels (which often host OA content alongside subscription content) and are simultaneously restricted from professional networking that facilitates knowledge sharing, the intent of making science freely available is paradoxically compromised by limiting the infrastructure required to produce and consume that science.
- **Impact on Global Collaboration:** JGLR serves an international community, particularly crucial for the binational nature of the Great Lakes between the U.S. and Canada. Restrictions on access and attendance hinder cross-border data sharing and collaborative analysis. Limiting the financial mechanisms that support our shared scholarly infrastructure weakens the transboundary trust and cooperation essential for managing shared water resources.

IAGLR urges OMB to recognize that "Open Science" requires more than just digital availability; it requires robust, sustainable funding mechanisms for the peer-reviewed ecosystem that validates and curates that science. Banning subscriptions does not increase openness; it restricts the flow of information to those who can afford article processing charges individually, while starving the institutional libraries that underwrite the vast majority of reliable scientific discourse.

8. Threats to International Collaborations §200.220 and §200.202(e)

These provisions threaten the international collaboration that promotes scientific discovery and the management of large lakes worldwide. Research on major freshwater systems—from the Laurentian Great Lakes shared by the United States and Canada to the African Great Lakes and others—relies on seamless data and knowledge sharing and joint inquiry across borders. The proposed restrictions risk severing foundational partnerships, effectively isolating American researchers from global networks essential for understanding and managing large lake ecosystems. By imposing artificial barriers on bilateral and multilateral agreements, these rules weaken the United States' capacity to lead in global freshwater science

and conservation. Ultimately, a “domestic-first” framework is counterproductive to collaborative partnerships working on transnational problems.

Recommendations

IAGLR respectfully requests that OMB reconsider this proposed rule or make substantial modifications addressing:

1. **Preserve peer review primacy:** Allow career program officers to rely on expert peer review recommendations without mandatory political override.
2. **Remove conference restrictions:** Conference attendance for scientific communication should remain routinely allowable without pre-approval.
3. **Allow professional memberships:** Society memberships and journal subscriptions essential to research should be categorically allowable costs.
4. **Define standards clearly:** If "Gold Standard Science" requirements are maintained, establish transparent, objective criteria that will be applied equally to all researchers and their institutions.
5. **Limit termination authority:** Establish clear procedures and due process before terminating active awards; prohibit retroactive terminations affecting completed deliverables.
6. **Preserve agency flexibility:** Allow agencies serving scientific communities to implement guidance consistent with their missions.
7. **Extend comment period:** Given the complexity and significance of these changes, extend the comment deadline beyond July 13, 2026, to allow thorough stakeholder input.
8. **Protect international scientific collaboration:** Ensure that funding rules do not restrict cross-border research agreements or partnerships with scientists globally, preserving the seamless data sharing and joint inquiry essential for managing transboundary freshwater ecosystems.

Conclusion

The United States has built its scientific leadership on principles of independent peer review, institutional autonomy, and merit-based funding allocation. These proposed changes reverse those foundational principles. For Great Lakes research specifically—where international cooperation, long-term commitment, and rigorous methodology are essential—these restrictions threaten both immediate progress and long-term stewardship capacity, not to mention the economic, human, and environmental health of the region.

IAGLR stands ready to discuss these concerns further and provide additional testimony as needed.

Respectfully submitted,

International Association for Great Lakes Research