



July 13, 2026

Office of Management and Budget
725 17th Street, NW
Washington, D.C. 20503

Re: Comments on Proposed Revisions to 2 CFR Part 200 (Uniform Guidance)

RIN: 0991-AC35

Submitted electronically via regulations.gov

Dear Director Vought:

The Health Innovation Alliance (HIA) is a diverse coalition of patient advocates, health care providers, consumer organizations, employers, technology companies, and payers that supports the commonsense use of data and technology to improve health outcomes and lower costs. We appreciate the opportunity to comment on the Office of Management and Budget's proposed revisions to the Uniform Guidance because of their potential impact on the U.S. research and innovation ecosystem.

Federally funded research is a cornerstone of American health innovation, economic growth, and global competitiveness. Maximizing the return on taxpayer investment requires more than funding research itself. It also requires an ecosystem that enables researchers to validate, disseminate, and build upon scientific discoveries while leveraging modern technologies that accelerate innovation. **The proposed revisions affect not only research institutions, but also the broader ecosystem of health innovators, technology developers, providers, and patients that depend on timely, trustworthy scientific evidence.** HIA is concerned that several provisions of the proposed rule could unintentionally weaken this ecosystem, and we respectfully offer the following comments.

First, HIA urges OMB to withdraw the proposed revisions to §§ 200.454 and 200.461. Scholarly publishing is a fundamental component of the research enterprise, ensuring that federally funded research is rigorously reviewed, validated, discoverable, and broadly disseminated. These activities maximize the scientific, economic, and public value of federal research investments and help maintain U.S. leadership in science and innovation. Making publication costs and research-related subscriptions broadly unallowable would weaken this infrastructure and diminish the return on federal research investments.

Accordingly, OMB should withdraw the proposed revisions to §§ 200.454 and 200.461 and retain the current treatment of publication costs and subscriptions, ensuring they remain allowable when they are reasonable, necessary, and directly connected to the purposes of the federal award. Specifically, HIA recommends the following revisions:

- **§ 200.454:** Costs of the recipient's or subrecipient's subscriptions to business, professional, academic, and technical periodicals are allowable when the subscription is necessary to conduct, disseminate, or maintain currency in the research or programmatic work supported by the Federal award.
- **§ 200.461:** Publication costs are allowable when reasonable, allocable, and consistent with the public-access and data-sharing requirements applicable to the award. This includes page charges, article processing charges (APCs), open access fees, data-sharing repository fees, and similar charges for peer-reviewed dissemination of results of work supported by the Federal award.

Second, HIA is concerned about the proposed restrictions on conference and meeting attendance. Scientific and professional meetings are integral to the research enterprise, enabling researchers to share findings, establish collaborations, stay current with emerging science, and accelerate the translation of discoveries into improved health outcomes. The existing standards requiring conference costs to be necessary, reasonable, and tied to the federal award already provide appropriate oversight. Requiring conference attendance to be expressly approved in the initial award would reduce flexibility, increase administrative burden, and limit the exchange of knowledge that is essential to maximizing the impact of federally funded research.

Third, HIA encourages OMB to clarify the treatment of cloud computing costs under the Uniform Guidance. Current interpretations have created inconsistent treatment between cloud services and on-premises hardware for purposes of facilities and administrative costs, creating incentives that discourage researchers from adopting modern cloud-based technologies, including artificial intelligence, machine learning, and advanced cybersecurity capabilities. OMB should clarify that cloud computing services and hardware receive consistent treatment, enabling researchers to select the technologies best suited to advance scientific discovery and maximize the return on taxpayer investment.

Finally, given the broad implications of the proposed rule across the federal research enterprise, HIA requests that OMB extend the public comment period. The proposed revisions raise significant operational, financial, and scientific issues affecting a wide range of stakeholders. Additional time is needed to fully assess the impacts of these changes and provide meaningful feedback that will support a well-informed final rule.

Thank you for your consideration of these comments.

Sincerely,



Roslyn Docktor
Executive Director