Response to the Office of Management and Budget (OMB) proposed revision to Guidance for Federal Financial Assistance

July 8, 2026

The OMB-proposed changes titled Regulation for Federal Financial Assistance relating to science will harm research and innovation. The Association for Computing Machinery (ACM) US Technology Policy Committee (USTPC) opposes the proposed changes and endorses the comments of numerous scientific professional societies, including the Computing Research Association, American Association for the Advancement of Science, American Astronomical Society, and the American Physical Society.

In this response, we focus on two topics: the impact of politicization on the scientific enterprise and on scientific societies in particular.

1. § 200.205 — Federal Awarding Agency Review of Risk / Pre-Issuance Review

Computer science has been a major stimulus for economic growth in the United States. Estimates vary, but over the past 50 years, 30-50% of economic growth has resulted directly from advances in computer science, driven in large part by government-funded academic research. The venture capital ecosystem in Silicon Valley is seeded by government-funded academic research. As just one of many examples, the internet, the basis for many aspects of modern economic growth, would not have occurred without government-funded research through DARPA, NSF, and other agencies. Companies like Google and Akamai would not exist without peer-reviewed government-funded research. Research continues to be crucial to the economy and to the discovery and invention of new life-improving technologies. It is not possible to predict exactly what future research will uncover or what new businesses it will spawn—but, in any case, a strong research ecosystem is crucial to maintaining American competitiveness and economic growth.

To knowledgeably recommend and monitor grants in a particular scientific field requires an individual qualified in the relevant field of research. The peer review, award, and grant administration procedures in use at NSF, NIH, DOE, and other US science agencies have proven themselves in this respect. One need only review the many scientific and technical advances stimulated by this government-funded research, the extent to which students from all over the world have sought to study at the grantee institutions, and the powerful contribution this research has made to the US economy for the past 50 years to acknowledge this success. Adding a layer of political review to this process will not advance our country's interests; it will stymie innovation and introduce unreasonable uncertainty into the scientific endeavor, along

with new bureaucratic bloat. This is contrary to OMB's claim of streamlining the research process.

2. § 200.461 — Publication and Printing Costs
The proposed changes have serious implications for ACM and peer professional societies as organizations, as well as for the broader computing research ecosystem. ACM serves as the organizational backbone of computing research and scholarly publishing in the United States and internationally. As a nonprofit professional society, ACM is supported primarily through membership dues and conference registration fees. In computer science, conferences are the primary venue for disseminating peer-reviewed research, and conference registration fees play a critical role in supporting the review, publication, and community infrastructure that underpins the field. Policies that discourage participation in professional societies or attendance at research conferences risk weakening this infrastructure and, by extension, the research ecosystem it supports.

3. § 200.432 — Conferences / § 200.454 — Memberships, Subscriptions, and Professional Activity Costs
In particular, the proposed requirement to obtain explicit approval for conference attendance at the time of grant submission, together with the proposed prohibition on using federal grant funds for membership in professional societies, would reduce participation in ACM conferences and membership in the organization. These changes would weaken the financial foundation that supports ACM's conferences, publications, and other scholarly activities. This would in turn weaken the dissemination of computer science findings and the research community; the result would be less collaboration and innovation in computing.

As a practical matter, this proposed process is particularly impractical for the purposes of grantmaking in the field of computer science. Computer science scholars typically do not know which conferences they might submit their academic work to a priori; this is only determined when the science has reached a sufficient level of development to warrant publication. As such, a researcher cannot request approval for some specific future conference when (a) the research has not yet been conducted and (b) the conference may not even have been announced yet.

In summary, we strongly urge that these proposed changes be discarded. These proposed changes would be harmful to science and to America's leadership in innovation.