

## URGENT ACTION NEEDED

# Help Protect Global Health Research, Scientific Collaboration and Public Health Preparedness

### Comments Are Due July 13

The Office of Management and Budget (OMB) has proposed sweeping changes to the regulations governing federal grants and cooperative agreements across the U.S. government. While framed as administrative reforms, many of the proposed changes could have far-reaching implications for the research and public health infrastructure that helps prevent, detect and respond to infectious disease threats worldwide.

ASTMH is urging all members – U.S. citizens and non-US citizens – to submit comments on a proposed federal rule that could significantly affect the future of infectious disease research, global health partnerships, scientific communication, workforce development and public health preparedness.

We have submitted formal comments on behalf of the Society, but individual comments are also critically important. Federal agencies need to hear directly from researchers, clinicians, public health professionals, educators, trainees and global health practitioners about how these proposed changes could affect their work and the communities they serve.

Below you will find three simple steps for submitting comments on your own. We have given you the links you need and suggested some topics that you may want to cover in your message.

## Take Action in Three Steps

### Step 1: Review Background Information

ASTMH is partnering with the American Physical Society (APS) and other scientific societies to encourage robust participation in the public comment process. [You can view our comments here: https://tinyurl.com/4ekaw5wz](https://tinyurl.com/4ekaw5wz)

We encourage members to begin by visiting APS's Federal Grants Rule Change Action Center, which provides a helpful overview of the proposal and guidance on submitting comments.

**APS Action Center** <https://www.aps.org/initiatives/advocate-amplify/policy/federal-grants-rule-change>

You may also review the Rule here: **OMB Proposed Rule**  
<https://www.regulations.gov/document/OMB-2026-0034-0001>

## Step 2: Submit Your Comment

We are partnering with APS to allow an easy way to submit your comments at <https://www.aps.org/initiatives/advocate-amplify/policy/federal-grants-rule-change>

The APS Action Center tool provides a convenient way to focus comments on four major categories: (1) grant review and politicization, (2) international collaboration, (3) professional activities and affiliations, and (4) broadening participation/workforce development. The tool will ask questions to prompt and build your comments.

If you wish to comment on other categories or wish not to use the APS tool, you can submit comments on your own through Regulations.gov:

<https://www.regulations.gov/document/OMB-2026-0034-0001>

The Regulations.gov online submission form includes:

- A general comment box for shorter comments.
- An option to upload a PDF or Word document for longer comments.

If you plan to provide detailed examples, discuss multiple provisions or include supporting information, consider uploading a separate document and using the comment box to summarize your key points.

ASTMH encourages members to submit comments as soon as possible and no later than **July 13, 2026**.

## Step 3: Tell Your Story

The most effective comments explain how the proposed changes could affect your work, your institution, your trainees, your patients, your community or your research partnerships. Personal stories and real-world examples are often the most persuasive comments.

Consider explaining how:

- Federal funding supports your research, public health activities, training programs or clinical work.
- International collaborations contribute to disease surveillance, outbreak response, clinical trials or implementation research.
- Scientific conferences and peer-reviewed publications help disseminate findings that improve health outcomes.
- Funding uncertainty could affect trainees, early-career investigators, laboratories, field sites, or public health programs.
- Federal investments in global health research strengthen preparedness for future infectious disease threats.

## Suggested Themes for ASTMH Members

Members do not need to address every issue. Focus on the concerns most relevant to your work and experience. If you are submitting comments through [regulations.gov](https://www.regulations.gov), you must cite the relevant section. Here is a sample comment: <https://www.regulations.gov/comment/OMB-2026-0034-11610>.

### ➤ Preserve International Scientific Collaboration

#### **Relevant Section: §200.202**

ASTMH has expressed concern that proposed restrictions on international research activities could impede outbreak investigations, surveillance programs, clinical trials, implementation research, and capacity-building efforts conducted with partners around the world. Tropical medicine research often must take place where diseases are endemic and where outbreaks emerge. International collaboration is not an exception to this work—it is often essential.

### ➤ Protect Scientific Peer Review and Scientific Independence

#### **Relevant Section: §200.205**

ASTMH has also raised concerns about provisions that would require senior political appointees to conduct pre-award reviews of discretionary grants and would make peer review advisory rather than central to funding decisions. ASTMH emphasized that scientific merit review should remain independent, transparent, expert-driven and insulated from political or ideological considerations.

Members may wish to discuss:

- Why scientific merit and expert peer review should remain the primary basis for funding decisions.
- How peer review helps identify the most promising and impactful research.
- Why long-term investments in infectious disease and global health research should remain stable across changing administrations.
- Concerns about provisions requiring consideration of whether projects advance presidential priorities rather than being evaluated primarily on scientific merit, public health need and potential impact.

### ➤ Protect Research on Health Disparities and Workforce Development

#### **Relevant Sections: §§200.218 and 200.300**

ASTMH expressed concern that provisions related to DEI, disparate-impact liability and related concepts could create uncertainty for research on health disparities and infectious disease burden across populations. ASTMH urged OMB to clarify that the rule does not prohibit health disparities research, demographic data collection, mentorship

programs, workforce development initiatives, conference participation or efforts to expand access to research opportunities.

Members may wish to discuss:

- The importance of studying disease burden across populations.
- The value of collecting demographic and epidemiologic data to improve public health interventions.
- The role of mentoring, training, and workforce development programs in preparing future scientists and public health leaders.
- How efforts to broaden participation in science strengthen research capacity, innovation, and public health preparedness.

### ➤ **Preserve Global Health Partnerships and Research Networks**

#### **Relevant Section: §200.220**

ASTMH urged OMB to narrow restrictions on certain foreign collaborations and provide a transparent waiver process for research and public health activities that advance U.S. health security and scientific objectives.

### ➤ **Maintain Stability and Predictability in Research Funding**

#### **Relevant Sections: §§200.340 and 200.341**

ASTMH expressed concern that broad new authorities allowing grants to be terminated or suspended based on changing agency priorities or interpretations of the national interest could create uncertainty for long-term research projects.

Members may wish to discuss how funding uncertainty could affect ongoing studies, personnel, trainees, international partnerships, field sites, surveillance systems and long-term public health investments.

### ➤ **Protect Scientific Conferences and Scientific Exchange**

#### **Relevant Section: §200.432**

ASTMH emphasized that scientific conferences are a primary mechanism through which federally funded research is scrutinized, validated, disseminated and translated into public health practice.

Members may wish to describe how conferences contribute to dissemination of research findings, outbreak and surveillance updates, professional development, collaboration and training.

## ➤ Protect Scientific Publishing and Research Dissemination

### **Relevant Section: §200.461**

ASTMH strongly opposed provisions that would make publication costs unallowable unless specifically approved. The Society emphasized that publication in peer-reviewed journals is a cornerstone of scientific accountability, transparency, replication and public health decision-making.

## ➤ Highlight Public Health and Global Health Security Impacts

ASTMH's comments emphasized that the proposed rule could weaken the global health research and surveillance networks that help identify infectious disease threats before they reach U.S. communities. Federal investments in international partnerships, surveillance systems, laboratory networks, field research and scientific collaboration strengthen preparedness for outbreaks and emerging health threats.

Members may wish to explain how federally supported research contributes to:

- Emerging infectious disease detection
- Pandemic preparedness.
- New tools and innovations to diagnose, treat, and prevent global health threats
- Infectious disease research and control
- Neglected tropical disease elimination
- Antimicrobial resistance efforts
- Global disease surveillance
- Health security in the United States and around the world

## Why This Matters to ASTMH Members

Federal grants are the foundation of much of the research, training, surveillance and international collaboration that advances tropical medicine and global health. The proposed rule could significantly reshape how federal agencies make funding decisions, support scientific partnerships and sustain long-term research investments.

For ASTMH members, these issues extend well beyond research administration. They affect the nation's ability to detect emerging infectious diseases, respond to outbreaks, develop new tools and interventions, train future experts and maintain the global partnerships that are critical to protecting public health.

Many of the pathogens that pose significant threats to Americans—including pandemic influenza, Ebola, mpox, dengue, Zika, malaria, antimicrobial-resistant organisms and emerging zoonotic diseases—originate or are first detected outside U.S. borders. Federal investments in international research partnerships, field studies, surveillance systems, laboratory networks and scientific collaborations help identify threats before they reach American communities and support the development of diagnostics, vaccines, treatments and public health responses.

The global health community has repeatedly demonstrated that investments in research, surveillance, workforce development, and international collaboration strengthen preparedness for health threats both abroad and at home. Changes to federal grant policies should preserve and strengthen—not weaken—these capabilities.

## Make Your Voice Heard

The proposed rule has the potential to affect the scientific workforce, international partnerships, research enterprise and public health infrastructure that support progress against infectious diseases and emerging health threats.

Please take a few minutes to submit a comment before **July 13**, and encourage your colleagues, trainees, collaborators and institutional partners to do the same.

Together, we can help ensure that federal grant policies continue to support scientific excellence, global collaboration, public health preparedness, and the research needed to protect communities from current and future infectious disease threats.