Society for Conservation Biology North America

The North America Section of a global community of conservation professionals

The Society for Conservation Biology North America (SCBNA) is deeply concerned by the Office of Management and Budget's (OMB) proposed rule, *Regulation for Federal Financial Assistance*, 91 Fed. Reg. 32198 (May 29, 2026), which would rewrite the Uniform Guidance at 2 CFR Part 200 governing federal research grants. SCBNA's members depend on federally funded, peer-reviewed research to inform science-based conservation of imperiled species and ecosystems across North America. The proposed rule would replace that merit-based system with one vulnerable to political interference, and we join the growing chorus of scientific societies urging OMB to withdraw it.

Political pre-issuance review threatens scientific integrity. The current guidance (§ 200.205) already directs agencies to build effective, merit-based review systems for evaluating research proposals. The proposed rule would layer a political appointee's discretionary sign-off on top of scientific peer review, applying vague criteria such as advancing "the President's policy priorities" and an undefined standard of "Gold Standard Science." Conservation research - particularly work touching on climate change, habitat loss, and endangered species - is especially exposed to this kind of politicized override. SCBNA supports retaining § 200.205 as written and eliminating the proposed pre-issuance political review.

Expanded termination authority undermines long-term research. The proposed rule (§ 200.340) would let agencies terminate awards for reasons unrelated to scientific progress, with minimal appeal rights. Conservation science depends on multi-year, often decades-long monitoring and field studies; abrupt termination can permanently erase irreplaceable long-term datasets and set back recovery efforts for imperiled species. SCBNA supports limiting termination to failure of research to progress, protection of study subjects, or material noncompliance, paired with a written justification requirement and a meaningful right of appeal.

Restrictions on international collaboration are overbroad. Conservation of migratory species, shared ecosystems, and transboundary threats depends on international research partnerships already governed by existing research-security statutes and agency policy. The proposed rule's broad restrictions on collaboration with "covered foreign countries" and "covered foreign entities" (§§ 200.202, 200.220) risk severing the cross-border collaborations conservation science requires. SCBNA supports narrowing these provisions to align with existing research-security frameworks.

Disallowed dissemination costs would restrict scientific communication. Conference travel, society memberships, and publication costs are how federally funded conservation research reaches practitioners, land managers, and policymakers. For early-career researchers and those at under-resourced institutions, federal support is often the only path to participating in these venues. SCBNA supports retaining these costs as allowable under the guidance.

The compressed timeline is inconsistent with sound rulemaking. More than 300 research, higher-education, and scientific-society organizations have asked OMB to extend the public comment period; public comments filed on this docket run roughly 94 percent in opposition to the proposed rule. SCBNA urges OMB to withdraw the proposed rule and, if a revised rule is issued, to provide no less than 12 months for implementation.

SCBNA encourages our members and partner organizations to reach out to their congressional delegations about the proposed rule's impact on federally funded conservation research.

Sincerely,

The SCBNA Policy Committee