September 24, 2025

The Honorable Mike Johnson
Speaker of the House
United States House of Representatives
H-232, U.S. Capitol
Washington, D.C. 20515

The Honorable Hakeem Jeffries
House Minority Leader
United States House of Representatives
H-204, U.S. Capitol
Washington, D.C. 20515

The Honorable John Thune
Senate Majority Leader
United States Senate
S-221, U.S. Capitol
Washington, D.C. 20510

The Honorable Charles Schumer
Senate Minority Leader
United States Senate
S-230, U.S. Capitol
Washington, D.C. 20510

Dear Speaker Johnson, Majority Leader Thune, Minority Leader Jeffries, and Minority Leader Schumer,

As scientific and medical research organizations, we wish to formally express our concerns regarding the Executive Order (EO) titled "Improving Oversight of Federal Grantmaking," issued on August 7. Our nation's federal grantmaking ecosystem serves as the gold standard for supporting cutting-edge research and driving technological innovation worldwide. Ongoing evaluation and oversight of this ecosystem contribute to its effectiveness in the U.S.; however, specific directives within this EO raise questions regarding the possibility of politicization in federally funded research. We respectfully request that Congress provide guidance as agencies implement this EO. It is critical that we safeguard the integrity of the merit-based peer review process.

The U.S. has led scientific innovation and breakthroughs for decades; this is in large part due to a gold standard merit-based framework that governs scientific funding decisions. Our leading science institutions, such as the National Institutes of Health, the National Science Foundation, the Department of Energy, the U.S. Department of Agriculture, and the National Aeronautics and Space Administration, have built peer review systems that direct federal funding to researchers with cutting-edge ideas and that ultimately drive breakthrough innovations that improve the lives of Americans in every state.

Without the oversight traditionally applied by appropriators and committees of jurisdiction, this EO will significantly increase administrative burdens on both researchers and agencies, slowing, and sometimes stopping altogether, vital scientific research that our country needs.

We call on Congress to urgently exercise its oversight authority to prevent potentially significant damage to U.S. leadership in scientific and medical research.

Below we detail specific concerns with several provisions of the EO.

Political Appointees [Sec. 3]

The role of political appointees in Cabinet positions and as agency leads provides an administration with the means to advance its defined agenda while still executing the legislative

mission and mandate of each agency. The EO's directive to shift review and selection of individual awards to political appointees fundamentally threatens the integrity of the grantmaking process by removing key subject matter expertise. This unprecedented oversight by political appointees risks injecting partisan political bias into what has long been an impartial, merit-based system. The peer review system, a process widely regarded as the gold standard for evaluating scientific merit and funding decisions, is built on the rigorous evaluation of proposals by independent scientific experts. This ensures that funding decisions are based on mission-driven scientific innovation and potential impact – not political considerations, which is why the U.S. has consistently led the way in driving breakthrough research and accelerating technological innovation. Shifting final authority to political appointees will significantly undermine the grant review and award system and could distort federal research priorities based on ideological or partisan agendas, stifle innovation, and erode public confidence in research. Research should focus on scientific inquiry, promise, and innovation to advance science and improve public health above politics.

We urge Congress to ensure that independent peer review remains the cornerstone of the scientific grantmaking process, such that the most meritorious proposals are funded in this and all future administrations.

Termination of Grants for Convenience [Sec. 5 and Sec. 6]

The expansion of "termination for convenience" authority in the EO has the potential to waste taxpayer resources and weaken the nation's scientific enterprise. Canceling grants midstream due to ever-shifting agency priorities would squander investments already committed to facilities, equipment, and specialized personnel, reducing our return on federal spending and potentially undermining the principle of accepting negative results as positive outcomes. Further, permitting awards to be terminated for reasons unrelated to performance or compliance opens the door for administrations of either party to effectively end funding for lines of research deemed politically sensitive. Employing such terminations will create perverse incentives to align research results with political agendas.

This prospect has the very real potential to generate a chilling effect across the research community. Scientists may avoid submitting grant proposals in areas that could be perceived as controversial, even when those fields hold considerable promise for transformative discoveries. The threat of termination for convenience will undercut U.S. competitiveness in a global research environment where other countries offer more predictable funding streams free of political interference.

We urge Congress to ensure that federal research funding remains insulated from short-term political pressures by directing science agencies not to amend the terms and conditions of discretionary grants to permit termination for convenience.

Repeat Grant Recipients [Sec 4. (b) (iv)]

We support the EO's goal of maintaining a balanced and broad portfolio of grant recipients, and we applaud existing efforts by science agencies in support of this goal, like the Established Program to Stimulate Competitive Research (EPSCoR) and the Institutional Development Award (IDeA). However, the EO is alarmingly vague about how "repeat players" will be identified in

practice. Funding a large research group, and thereby providing training opportunities for its undergraduate, graduate student, and postdoctoral members, may require applying for multiple funding opportunities each year. Limiting the number of grants that an individual can apply for could compromise research in areas where large teams are needed and undermine the development of a strong national STEM workforce. It should also be noted that some agencies already have statutory processes in place for evaluating limits on proposals. For example, in 2008, the National Science Board submitted a report to Congress on Limits on Proposal Submissions by Institution, as directed by the NSF Authorization Act of 2007.

We urge Congress to work with the scientific community, including groups like the National Science Board, to evaluate current practices and recommend measures to support a broad portfolio of grant recipients.

Overall, this EO adds inefficiencies to the grant process**.** For instance, the EO institutes new requirements for the drawdown of approved grant funds, including "written explanations or support, with specificity, for requests for each drawdown." Such requirements introduce undue interference and will likely exacerbate, rather than lighten, the burden of administrative costs on federal grants - contrary to the EO's stated goal. Additionally, the EO increases researchers' administrative workload by requiring all federal grantmaking agencies to implement new processes for reviewing notices of funding opportunities and discretionary grants, both pre- and post-selection. Adding new layers of review and approval across the entire grant portfolio will entail significant agency staff time and resources, and risks slowing the process of reviewing and awarding grants.

Finally, Congress must stop the Administration's proposal to prioritize research proposals from academic institutions with the lowest indirect (Facilities & Administration) cost rates. Current F&A rates are methodically negotiated and audited by the federal government. No changes to this process should be made without proper legislative and regulatory changes to the federal code. F&A costs can vary from state to state and from academic institution to academic institution, depending on the resources and capacities of individual departments as well as the complexity and focus of the research in question. Issuing research awards based on the lowest indirect cost rates undermines what should be the driving factor in awarding federal science funding – the ability to produce demonstrable results that lead to innovation, new technologies, and a return on public investment.

On balance, the EO does not advance the Administration's goal of implementing Gold Standard Science. More review and oversight are needed by Congress before the full implementation of this EO goes into effect. The scientific community is eager to work with Congress and the Administration to strengthen our scientific enterprise.

Sincerely,

Academic Data Science Alliance
Academy for Radiology and Biomedical Imaging Research
American Association for Dental, Oral, and Craniofacial Research
American Association of Immunologists
American Association of Physicists in Medicine
American Association of Physics Teachers
American Astronomical Society

American College of Medical Genetics and Genomics
American College of Radiology
American Educational Research Association
American Geophysical Union
American Geosciences Institute
American Industrial Hygiene Association
American Institute for Medical and Biological Engineering
American Institute of Biological Sciences
American Mathematical Society
Academic Pediatric Association
American Pediatric Society
American Physical Society
American Physiological Society
American Phytopathological Society
American Psychological Association Services
American Society for Biochemistry and Molecular Biology
American Society for Cell Biology
American Society for Microbiology
American Society for Pharmacology and Experimental Therapeutics
American Society for Transplantation and Cellular Therapy
American Society of Plant Biologists
American Society of Tropical Medicine and Hygiene
American Statistical Association
American Thoracic Society
Association for Women in Science
Association of Medical School Pediatric Department Chairs
Association of Population Centers
Biophysical Society
Botanical Society of America
Coastal and Estuarine Research Federation
Computing Research Association
Ecological Society of America
Electrochemical Society
Endocrine Society
Entomological Society of America
Geological Society of America
International Society for Stem Cell Research
Natural Science Collections Alliance
Pediatric Policy Council
Population Association of America
Society for Neuroscience
Society for Pediatric Radiology
Society for Pediatric Research
Society for Personality and Social Psychology
Society for Public Health Education
Society of Behavioral Medicine
Society of Chairs of Academic Radiology
Society of Environmental Toxicology and Chemistry of North America
SPIE, the international society for optics and photonics
The Association for Research in Vision and Ophthalmology
The Oceanography Society

cc:
House Committee on Agriculture
House Committee on Energy and Commerce
House Committee on Science, Space and Technology
Senate Committee on Agriculture, Nutrition and Forestry
Senate Committee on Commerce, Science and Transportation
Senate Committee on Energy and Natural Resources
Senate Committee on Environment and Public Works
Senate Committee on Health, Education, Labor and Pensions