

July 7, 2026

Submitted at [federalregister.gov](https://www.federalregister.gov)

RE: Regulation for Federal Financial Assistance

The American Occupational Therapy Association (AOTA) is the national association representing more than 240,000 occupational therapy practitioners and students nationwide including occupational therapy researchers. We appreciate the opportunity to comment on OMB's proposed Regulation for Federal Financial Assistance.

Science-driven occupational therapy (OT) research is centered around improving participation in activities of daily living, and successful OT interventions enable people to minimize risks that result in costly ER visits, hospitalizations and institutional care. Desired outcomes include improved health, function and quality of life; return to education and work; and engagement and participation in the community which all lower morbidity and mortality while lowering caregiver demands, lost productivity and health care expenditures. The results of OT research are of special importance to people with disabilities and to anyone who is recovering from a significant illness or injury at any stage of life.

OT research is conducted primarily by university researchers, rehabilitation research centers, and non-profit organizations at facilities which often conduct research impacting a wide array of other specialties. Such research is often multi-disciplinary in nature with other rehabilitation or medical specialties participating in various aspects of the study. OT research is often funded through federal grants provided by the National Center for Medical Rehabilitation Research (NCMRR) and other Institutes at the National Institutes of Health (NIH) as well as the National Institute on Disability, Independent Living, and Rehabilitation Research (NIDILRR) which is part of the Administration for Community Living (ACL).

OT research efforts can be conducted over varying lengths of time, and grant funding is provided accordingly. Long-term projects may track the progress of trial subjects over many years to determine whether OT interventions have a lasting impact on how a person adapts to living independently given specific limitations caused by disability, injury or illness.

OMB Proposal would Hinder Efforts to Address Chronic Health Crisis in America

OMB's proposed Regulation for Federal Financial Assistance would conflict with the current Administration's stated scientific priorities by politicizing and destabilizing current and future research efforts. (<https://www.whitehouse.gov/wp-content/uploads/2025/09/FY27-OMB-OSTP-RD-Priorities-Memo-FINALSIGNED.pdf>). The Administration has prioritized strengthening American health and technology, with a focus on the management of chronic conditions such as Alzheimers and neurodegenerative diseases, cancer, and other debilitating and costly conditions. OT research is central to developing gold standard science that will enable individuals with disabilities or those who face serious challenges related to injuries or illness to manage activities of daily living at the highest level possible to avoid costly ER visits, hospitalizations and institutionalizations. Such efforts are not political and should not be evaluated through a political lens. The changes proposed would introduce heightened levels of uncertainty and instability, especially for long-term research projects, which would lead to a decrease in the number of research projects undertaken and inevitably in the number of researchers working in the field.

Political Priorities in Grant Review will Create Whipsaw Effect on Researchers

OT research grants are awarded by NCMRR, NIH, NIDILRR and others based on the quality of the proposal and the need for the research product. As proposed, OMB's revisions to the Uniform Guidance (section 2 CFR § 200.205, Merit Review) would give political appointees an effective veto over any OT research proposal that was perceived to conflict with Administration priorities at the time. Frequent political shifts would undermine continuity in important OT research areas such as aging in place, early intervention, neurological rehabilitation, mental health, caregiver training, and rural healthcare delivery.

Prioritizing political considerations over peer-reviewed scientific analysis will introduce uncertainty regarding whether approved grant applications or studies could suddenly run afoul of political orthodoxies of either the right or left regardless of whether the study has scientific merit. No party remains in power indefinitely, and topics that are considered apolitical could be reclassified as "political" based on shifting opinions from whichever Administration were in power at the time.

Occupational therapy services and research efforts are inherently apolitical in nature, and legislation or regulations impacting occupational therapy are nearly always proposed and enacted in a bi-partisan manner. Subjecting OT research efforts to new arbitrary and unpredictable political standards will diminish the ability of researchers to address issues such as how to provide services to people with disabilities to enable them to live as independently as possible. The challenges that OT research addresses can impact everyone at any point in time. They should not be politicized.

OMB Proposed Guidance would Create Sudden Defunding Risk

OMB's proposed revisions to the Regulations for Federal Assistance (section 2 CFR § 200.340, Termination and Suspension) would allow granting agencies to suspend or terminate grants at any time if the project were no longer perceived to be aligned with Administration priorities without requiring any explanation or establishing a formal appeal process. This would mean that fully funded federal grants which had been judged worthy by a federal agency could be defunded with no formal explanation.

Scientific research should not be at the mercy of swings in political control which routinely include shifts in political priorities whether from the right or left. OT research is not political in nature; however, the proposal as drafted would allow any agency to cancel a grant for any reason while simply referencing political considerations. The sudden defunding of a project would likely eliminate the value of research already conducted, potentially upending years or even decades of accumulated research and introduce new uncertainty for researchers considering whether to commit to longer-term or pilot research projects.

Restrictions on Grant Costs would Limit Ability to Disseminate Study Results

OMB's proposed limitations on allowable costs related to dissemination activities including publications, subscriptions, memberships and conference attendance would limit researchers' ability to widely disseminate results which is critical to gaining peer review and translating OT research into practice (2 CFR § 200.432, conferences), § 200.454 (memberships and subscriptions), § 200.461 (publication costs). Presentations at conferences are a primary means of obtaining peer review and are a low-cost way to disseminate results while also addressing rigor, reproducibility and other elements that are consistent with "gold standard" science. In addition, publishing results in peer-

reviewed journals is essential to broaden exposure of study results to fellow scientists who will review and criticize findings as necessary.

Obtaining the widest possible review is essential to enable researchers to evaluate and debunk studies which can gain traction if not challenged by peers. As an example, non-peer-reviewed studies related to falls have in the past recommended that older adults should minimize physical activity to reduce falls risk, while all peer-reviewed studies indicate that tailored exercise and movement is critical to avoid accelerating disability which increases falls risk. The peer review process works to identify inconsistencies and problems with research findings to reduce the chances that harmful recommendations are implemented.

Researchers, especially at smaller institutions, often depend on dedicating a small portion of grant funding to disseminate research results as widely as possible for peer review. Research that is not widely publicized and translated into practice is effectively worthless if OT/therapy techniques are not enhanced and improved as a result of the study. This is essential if people with disabilities or those recovering from injury/illness are to benefit from the federal dollars spent on a study.

AOTA urges OMB to Revise Proposed Rules to Avoid Damaging OT Research Efforts

As noted, federal OT/rehabilitation research efforts improve critical services provided to millions of Americans at some point in their lives. By formally introducing political considerations into research activities, the proposal as drafted would reduce innovation in the provision of rehabilitation services and potentially upend current research projects which would limit the potential for new OT/rehab techniques and methods to enable people to live up to their fullest potential. By limiting options for disseminating research results for peer review, the proposal would encourage the spread of unreviewed junk science which could do harm to people who require OT/therapy services to thrive at the highest level possible. As a result, AOTA urges OMB to revise its proposal to address these serious concerns.

Thank you for considering our comments on this proposal.

Sincerely,

A handwritten signature in black ink, appearing to read "Andrew Bopp". The signature is fluid and cursive, with a large, stylized "A" at the beginning.

Andrew Bopp
Senior Legislative Representative