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July 13, 2026

The Honorable Russell Vought
Director
Office of Management and Budget
725 17th St, NW
Washington, DC 20503

**Re: OMB-2026-0034, Proposed Revisions to the Uniform
Administrative Requirements, Cost Principles,
and Audit Requirements for Federal Awards**

Dear Director Vought:

Pennsylvania Medical Society (PAMED) would like to thank you for the opportunity to comment on the Office of Management and Budget's (OMB) Notice of Proposed Rulemaking (NPRM) concerning the Uniform Guidance governing federal grants. PAMED is Pennsylvania's largest physician-led professional association and advocates in furtherance of the interests of physicians and their patients.

OMB's proposed revisions will have far-reaching implications across every area of medicine: from research supporting new developments in treatment that advances public health and strengthens the quality, value, and affordability of health care, to programs that prepare physicians to serve the nation. Federal investment in these efforts has resulted in transformative gains in health, innovation, and affordability.

PAMED agrees with the strategy developed to achieve these aims: allocating federal funding to research and programs that offer the greatest value to the American public; increasing access to funding opportunities and minimizing burdens on grant recipients; ensuring robust transparency, oversight, and accountability; and making the most effective use of taxpayer resources. That said, PAMED is concerned that, as written, several provisions of the proposed rule would undermine these objectives. Thus, PAMED respectfully offers

the following recommendations to support the Administration's goal to advance a more effective, transparent, and accountable grantmaking infrastructure for the benefit of Americans:

1. Focus federal funding on the research and initiatives that offer the greatest benefit to society and have the highest merit.

- Strengthen program effectiveness by requiring federal agencies to document the evidence base, evaluation plans, performance metrics, and expected public outcomes for new initiatives, rather than designing programs to align with current Administration priorities.
- Preserve merit-based award decisions grounded in objective statutory, scientific, and technical evaluation criteria, and eliminate the proposed requirement to assess alignment with presidential priorities, as well as the accompanying broad ideological and subject-matter limitations.
- Replace the proposed pre-award review of discretionary grants by political appointees with a merit-based review process that relies on qualified unconflicted reviewers and objective evaluation criteria, including consistency with statutory requirements, the significance of the need addressed, anticipated impact, technical quality, and feasibility of implementation.

2. Make funding opportunities more accessible while reducing administrative complexity for recipients.

- Require agencies to post funding announcements on Grants.gov with clear eligibility requirements and accessible points of contact; and offer pre-application assistance to all prospective applicants.
- Use multi-year awards to decrease the need for repetitive application, renewal, and reporting processes.

3. Improve oversight and accountability while increasing transparency in federal grantmaking.

- Enhance procedures for monitoring overdue financial and performance reports and resolving unexpended award balances.
- Require recipients to disclose potential conflicts of interest and report credible evidence to the relevant agency.

4. Increase the effectiveness and return of taxpayer-funded investments.

- Require agencies to ensure that recipients report all research results and make underlying data, methodologies, and code available in accessible formats.
- Withdraw the proposed expansion of discretionary termination authority and new stop-work authority to avoid disrupting ongoing work and jeopardizing the retention of research participants and collaborative partnerships.

PAMED is grateful for the opportunity to comment on these proposed revisions and welcomes the opportunity to offer expertise and assistance to OMB. Please reach out to me directly at president@pamedsoc.org if you have questions or need further information.

Sincerely,

A handwritten signature in black ink, appearing to read 'Arvind R. Cavale'.

Arvind R. Cavale, MD

President of the Pennsylvania Medical Society