Cure Alzheimer's FUND
targeting breakthrough research

July 10, 2026

The Honorable Russell Vought
Office of Management and Budget
Office of Federal Financial Management
Executive Office of the President
Washington, DC 20503

Submitted via regulations.gov

Re: Comments on Proposed Revisions to Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (OMB-2026-0034)

Dear Director Vought,

I submit these comments on behalf of Cure Alzheimer's Fund, a not-for-profit with the sole mission of funding research to end Alzheimer's disease. I write in strong opposition to the Office of Management and Budget's (OMB's) proposed rule, *Regulation for Federal Financial Assistance,* published at Docket OMB-2026-0034.

Since our founding in 2004, we have provided more than $275 million in grants to over 400 Alzheimer's disease researchers worldwide. In some instances, researchers can add additional aims to NIH projects due to our funding; in other instances, our funding enables researchers to develop datasets that become foundations for later successful NIH grant applications. In fact, the scientists we fund have received more than $649 million in follow-on NIH funding, demonstrating what happens when private philanthropy and federal research work together. Researchers we support also receive funding for their work from the NSF, DoD, VA, and other federal scientific funders.

CureAlz receives no government support, and our opposition reflects no financial self-interest. Our only concern is for the health of the entire discovery-to-treatment ecosystem. Philanthropic funding supports high-risk discovery research that for-profit industry cannot justify investing in; NIH funding provides the rigorous follow-on studies needed to advance the promising pre-competitive discoveries; and biotechnology and pharmaceutical companies can then translate those advances into treatments for patients. Every part of this system is essential to delivering cures.

We oppose this rule because it will not make federal science funding more efficient, accountable, or beneficial to the American people. By subjecting grant awards to political rather than scientific judgment, destabilizing the long-term funding commitments that research requires, silencing scientific communication, and exposing researchers to unprecedented legal jeopardy, this rule would dismantle the infrastructure that has made American biomedical developments the envy of the world.

[200.205] Political Appointees Are Not Adequate Substitutes for Expert Scientific Consensus Judgment, and Prioritizing Institutions with Lower Indirect Costs Would Waste Grant Funding

Cure Alzheimer's Fund opposes giving political appointees the power to override the outcome of scientific peer review. The current system awards funding only to projects that have been thoroughly vetted for scientific merit and rigor by experts with years of relevant education and experience who are active at the forefront of their scientific specialty. Although it, like any human system, is imperfect, it matches decisions with those best equipped to make them. The proposed rule instead requires that political appointees supplant expert judgment with their own estimation of whether grant applications advance the sitting President's policy priorities. Nowhere in this standard is scientific merit, patient need, or the public good articulated or prioritized as a requirement. Compounding this, the rule requires political appointees to review every grant and forbids them from deferring to peer reviews. The independent expert review system that has governed NIH and federal science funding for over 80 years is reduced to advisory status, with no requirement that political appointees justify overriding or ignoring it.

Alzheimer's research spans numerous fields (e.g., genetics, physics, neuroimmunology, biomarkers, the microbiome, and others). It requires expertise to evaluate it. Political review by officials who cannot reasonably possess that expertise does not improve accountability. It displaces the rigorous review we have invested decades in building. The cyclical nature of politics makes this worse. Policies and political appointments can change rapidly within a single presidential administration, and what one president favors may be radically different from the goals of his successor. Meaningful Alzheimer's research requires long-term commitment measured in years, not grant cycles beholden to shifting administration priorities. Funding based on political alignment rather than scientific merit devastates the stability and commitment that successful research requires.

Finally, centralizing reviews and decision-making significantly slows the process of grant funding. The NIH has been reasonably criticized in the past for the time and expense required of investigators to apply for and be awarded funding. That pace has been slowed even further under recent peer review centralization policies; adding political review after the peer review stage – political review empowered to ignore the results of peer review – will waste valuable time for applicants and peer reviewers without improving scientific outcomes.

This proposed rule also privileges proposals with lower indirect costs. Every institution should be held accountable for resource efficiency, and the current system does so by requiring extensive documentation and negotiations over each institution's indirect rates at regular intervals. A blanket preference for lower indirect rates ignores the underlying drivers for these rate differences. Cutting-edge science requires incredible investment in technology, infrastructure, and workforce expertise, investments that are not project-specific but that enable excellence across projects. Excellence in science is achieved in the strongest scientific environment, not the cheapest one.

[200.332, 200.340-200.343] Funding Instability Would Discourage Vital Long-Term Scientific Investigations

This rule gives agencies sweeping authority to terminate active grants whenever a project is deemed inconsistent with "national interest as it exists at the time of termination." No finding of wrongdoing, noncompliance, or scientific failure is required. A new 90-day stop-work suspension authority has been added, and terminations cannot be appealed. Cure Alzheimer's Fund opposes this new termination authority because it will discourage the long-term investments that science requires.

Federal funding is integral to biomedical progress, particularly due to its irreplaceable role at the earliest stages of discovery. A study in the Proceedings of the National Academy of Sciences found that NIH-funded research contributed to every single one of the 210 new drugs approved by the FDA between 2010 and 2016, with over 90% of that funding supporting basic research on biological targets rather than the drugs themselves.
The private sector cannot and will not fill this role. No business model can justify the unfocused curiosity and investment timelines required by fundamental discovery research. The GLP-1 drugs currently revolutionizing diabetes and obesity care originate from an early 1980s NIH-funded investigation of Gila monster venom and a 1992 VA-funded translation of that discovery into a drug candidate. FDA approval of the first GLP-1 took another 13 years. No for-profit company would have invested in lizard venom in the hope that it might yield the top-selling drug in the United States 40 years later.

Alzheimer’s disease is no different. The pathway from basic discovery to approved treatments can take decades, and the exploratory science required at the beginning of that journey, which is highest in risk and lowest in commercial appeal, is exactly what federal funding exists to support, and exactly what this rule puts at risk.

Alzheimer's research depends on stable long-term funding, which supports multi-year longitudinal studies, carefully assembled patient cohorts, and ongoing clinical trials. When funding is severed unexpectedly, the loss is often permanent. The scientific momentum built over years of work collapses. How can scientists recruit patients into long-term studies if they cannot guarantee they will be completed? How can institutions justify the infrastructure investment that serious research requires when any grant can be terminated at any time for any political reason with no avenue for appeal?

The rule compounds this instability by requiring pass-through entities to ensure subrecipients do not take actions that could “damage” the reputation of the federal government. This vague and subjective standard hands political appointees a way to terminate grants based not on how research is conducted or the accuracy of scientific findings, but on what researchers and their institutions say publicly. Legitimate scientific communication and patient advocacy—activities central to any serious biomedical research organization—become sources of funding risk. The effect on scientific speech is not incidental to the rule’s design; it is its purpose.

Another consequence is the permanent loss of the next generation of Alzheimer's researchers. Institutions are already reducing spots in graduate programs because they are unsure that the project grants that fund students and their work will last long enough for students to earn their degree. Graduate students, postdoctoral fellows, and early-career scientists will not build careers in a field where funding is subject to political whim, and researchers face legal jeopardy for their work. Industry cannot replace this pipeline; it runs through research universities that depend on federal funding. A generation of Alzheimer's researchers driven from the field by this environment cannot be replaced.

[200.202(e), 200.220] International Collaboration on a Global Disease Cannot be Severed

The proposed rule prohibits the use of federal funds, including indirect costs, to support collaboration with countries on broad foreign adversary or sanctions lists.

Alzheimer’s disease does not respect borders, and neither does the science needed to defeat it. The diversity of backgrounds, population cohorts, and clinical presentations across countries is not a geopolitical consideration; it is a scientific necessity. Scientific progress depends on

bringing together the best minds, data, and expertise wherever they are found. These collaborations strengthen American research, benefit American patients, and help fuel the biomedical innovation pipeline that supports U.S. economic and scientific leadership. Severing these relationships does not protect American research leadership. It undermines the very ecosystem that sustains it.

[200.300] Content-Based Restrictions will Harm Patients

The rule prohibits the use of federal funds in connection with DEI practices, gender ideology, or race- or identity-based research. These restrictions will damage Alzheimer's research. Biology is not one-size-fits-all. Equal protection under the Constitution means every American deserves to have their government fund research into their biology and health. Women are twice as likely as men to develop Alzheimer's. Black and Hispanic Americans are at greater risk for the disease than white Americans. Research into why these disparities exist is not ideological. It is essential. Understanding the biological mechanisms behind these differences is how we develop treatments that work for everyone. A rule that makes this research illegal or legally risky does not serve the American public. It abandons a significant portion of it.

[200.432, 200.454, 200.461] Suppression of Scientific Communication

Taxpayer-funded research that cannot be shared serves no one. Yet this rule makes article processing charges and open access fees unallowable by default, directly contradicting the 2022 OSTP mandate requiring public access to federally funded research. Scientific research is built on prior work. Lack of transparency and access to what has been accomplished leads to redundancy and a waste of resources. It also prevents the public from accessing the findings of research their taxes paid for.

This rule requires that conference attendance be approved and included in the award terms at the time of issuance, which is operationally impossible, as conferences are not scheduled years in advance. The rule also makes journal subscriptions and professional memberships unallowable, cutting researchers off from the scientific literature and connections that are foundational to their work.

[200.339(b)] Weaponization of the Legal System Against Good-Faith Science

Under existing law, individuals can bring False Claims Act suits against scientific institutions and researchers. This rule dramatically expands that threat by redefining fraud to include any alleged violation of the terms and conditions of a federal award. Given how broadly and vaguely this rule defines those conditions—prohibiting anything deemed to promote anti-American values, damage federal reputation, or conflict with the President's policy priorities—virtually any researcher working in a politically sensitive area becomes a potential defendant. The Department of Justice (DOJ) could join those suits. Just the threat of litigation will suppress vital research because defending even frivolous suits would be financially ruinous for scientists and institutions. Anyone studying health disparities or sex-based differences in diseases now faces potential legal liability simply for doing their jobs. This provision deputizes private litigants as political enforcers with the DOJ as a backstop, and it will drive scientists out of federally funded research.

The Broad and Rapid Rulemaking Raises Legal Questions That Will Trigger Divisive Litigation

The breadth of this proposed rule and the speed with which it has been proposed for adoption raises significant questions about the balance of power between OMB and Congress. Certain provisions empowering the government to police the speech and behavior of grant recipients raise other constitutional questions. The expansion of the Department of Justice's purview and the vagueness of standards the rule would impose raise still other legal concerns. On these myriad legal grounds, the proposed rule as written will mire the federal government in contentious dispute and litigation with numerous stakeholders on a wide variety of fronts. The current system is certainly imperfect, and true improvements yielding higher quality scientific outcomes would be celebrated. However, such upgrades are most likely to be achieved through reasoned debate and consensus decision making, not backdoor regulatory tactics.

Conclusion

Cure Alzheimer's Fund urges OMB to withdraw this proposed rule in its entirety.

America's leadership in biotechnology and pharmaceuticals was built on a research pipeline that moves discoveries from the laboratory to the marketplace. Weakening that pipeline means fewer breakthroughs, fewer opportunities for American companies, and slower progress for patients and their families. The question is not whether we can afford to sustain this ecosystem. It is a question of whether we can afford to lose the economic and scientific leadership it provides.

Seven million Americans are living with Alzheimer's disease. Millions more will be diagnosed in the years ahead. We are at a critical moment where the science that could finally change the course of this disease is within reach. The biology and burdens of Alzheimer's are not political; Americans across the political spectrum are united in wanting prevention, treatment, and cure. We urge the OMB to withdraw the proposed rule and ensure that American science can continue to lead toward a world without Alzheimer's disease.

Sincerely,

Meg Smith
Chief Executive Officer
Cure Alzheimer's Fund