

Congress of the United States

Washington, DC 20515

September 3, 2026

Mr. Brian Stone
Chief of Staff, Performing the Duties of the Director
National Science Foundation
401 Dulany Street
Alexandria, VA 22314

Dear Mr. Stone:

We write in opposition to the proposed changes to NSF's Proposal and Award Policies and Procedures Guide, now titled Guidance on Financial Assistance (GFA).¹ **At its core this proposal threatens America's scientific leadership by undermining scientific integrity and allowing political ideology rather than evidence to drive research.**

This revision would prematurely align NSF policy with the Office of Management and Budget's (OMB) proposed revisions to federal financial assistance regulation 2 CFR 200.² These efforts, along with aligning with Trump Executive Orders, threaten to decimate our federal scientific enterprise and inflict real harm on our nation's scientific experts. **We urge NSF to rescind these proposed revisions.**

An unprecedented attack on American science

Since Trump came into office, his administration has taken a sledgehammer to federal funding of science. In 2025, NSF had over 1,300 grants cut, totaling over \$700 million.³ In June, reporting showed that NSF has cut basic science programs across its directorates by an average of 20 to 30%, according to an internal memo from the agency received by the publication.⁴ These cuts are a violation of clear direction from Congress, which, on a bipartisan basis, unambiguously rejected the Administration's destructive budget request for NSF.⁵

Cancellation of NSF grants does more than stifle scientific progress, it destabilizes the entire research pipeline. Uncertainty in program funding leaves laboratories with fewer resources to support the next generation of scientists, while making it increasingly difficult for early-career

¹ <https://www.federalregister.gov/documents/2026/06/24/2026-12725/agency-information-collection-activities-comment-request-national-science-foundation-proposalaward>

² <https://www.federalregister.gov/documents/2026/05/29/2026-10817/regulation-for-federal-financial-assistance>

³ <https://www.sciencenews.org/article/nih-nsf-cuts-2025-data>

⁴ <https://www.science.org/content/article/exclusive-nsf-slashes-research-programs-support-new-tech-initiative-insiders-say>

⁵ <https://rules.house.gov/bill/119/PIH-FY2026-CJS-EnergyWater-Interior>

researchers to build a future in American science. The consequences are already clear with three in four U.S. based researchers overall having considered leaving the country for countries where science is still valued.^{6,7} **We are at risk of losing both an entire generation of researchers and the discoveries they would have made.**

Scientific merit and integrity must come before political priorities

Guide 8 of the GFA eliminates guardrails that protect merit-based review. The summary of the draft states that “no significant changes are made” and that grant reviews will continue to be led by NSF Program Directors. However, authorities derived from 2 CFR 200 ultimately govern the GFA where applicable. OMB’s proposed changes to 2 CFR 200 takes a dangerous step in the science-based merit review process by empowering senior political appointees to make ultimate grantmaking decisions based on politics and requiring discretionary awards to advance the President’s policy priorities. **The scientific merit of innovative, fundamental, high-risk, and emerging technology research should be determined through rigorous peer review by scientific experts without political interference.** Authorizing senior political staff to oversee the merit review process will systematically destroy American science as we know it and is a mistake our research communities will take generations to recover from.

Guide 13 states that “NSF expects the highest standards of scientific rigor, integrity and adherence to the tenets of Gold Standard Science in proposals” but gives no operational framework for how it will be implemented or whether a proposal or award meets the standard. Executive Order 14303 “Restoring Gold Standard Science” weakens scientific integrity policies, removes safeguards, and leaves our scientific enterprise more vulnerable to the ever-changing political whims of the White House. Scientific Integrity means protecting the independence of science from external manipulation. This administration has been relentless in its attacks on science with more than 562 unique instances documented since January 20, 2025.⁸ **When scientific integrity is undermined and expert voices are pushed aside for political priorities, the repercussions for our environment, technological advancement, public health and safety, will be disastrous.**

Guide 25 on Suspensions, Terminations and Research Misconduct creates another dangerous avenue for political interference. Guide 25, to align with OMB’s proposed changes to 2 CFR 200, enables NSF to suspend or terminate an award when it believes it is necessary to “protect the interests of the government.” NSF has already terminated awards under the vague auspices of no longer effectuating agency priorities.⁹ Guide 25 language for these authorities are concerningly broad, and in effect, codifies the requirement for NSF to comply with the political

⁶ <https://www.npr.org/2026/06/30/nx-s1-5875206/trumps-cuts-science-researchers-move-abroad>

⁷ <https://www.nature.com/articles/d41586-025-00938-y>

⁸ <https://blog.ucs.org/jules-barbati-dajches/one-year-in-the-anti-science-agenda-of-the-trump-administration-is-evident/>

⁹ <https://www.nsf.gov/updates-on-priorities#termination-process>

whims of the White House without regard for merit. **Researchers should not have to ask whether their work is politically acceptable before they pursue it.** NSF has not had a Congressionally confirmed leader since Director Panchanathan resigned last year, meaning that these proposed rule changes, including the expanded termination authority, will be exercised by unknown political actors with no accountability to Congress or the taxpayer. Ambiguous authority to terminate awards invites political interference and creates uncertainty that our research institutions cannot afford.

Barriers to communication and collaboration will slow scientific progress

Attending conferences is an essential part of the scientific process and an invaluable opportunity for early-career scientists to connect with other researchers, build collaborations, and receive feedback on their work. Guide 12, in alignment with OMB's proposed changes to 2 CFR 200, adds restrictions and layers of bureaucracy for researchers to get approval to attend conferences. This proposed change limits researchers' opportunities to build upon their research by finding new collaborators and unlocking new perspectives for interdisciplinary problems. Real scientific progress only happens when researchers can openly share ideas, challenge one another, and collaborate. NSF should be breaking down barriers to discovery rather than building new ones.

Guide 12 also restricts federal funds from being utilized for publication of research. Publication of science is not just how scientists are able to communicate their findings with each other but how American taxpayers can access the research that they have funded. Restricting opportunities for researchers to present and disseminate their research will diminish the impact of American research and erode the United States' position as a global leader in science.

The actions in this proposed revision will weaken America's scientific credibility and further erode trust with our international allies. Genuine scientific progress demands sustained investment in people, infrastructure, and the freedom to follow the evidence wherever it leads, without censorship, coercion, or fear.

America became a scientific powerhouse by trusting and funding our scientists. We will only remain a global leader if we continue to do so. **We urge you to withdraw this revision and focus on supporting policies that meaningfully uphold the independence, integrity, and funding of American science — not just in rhetoric, but in practice.**

Sincerely,



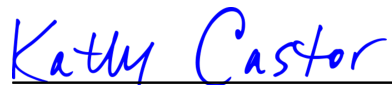
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Member of Congress



Raja Krishnamoorthi
Member of Congress



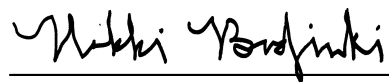
Eleanor Holmes Norton
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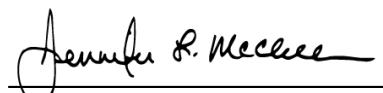
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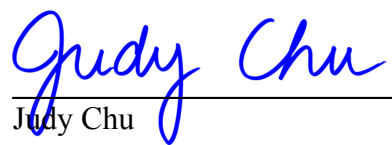
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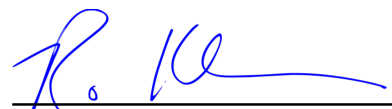
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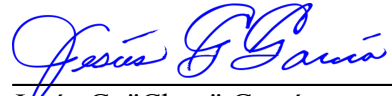
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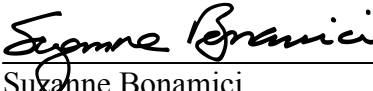
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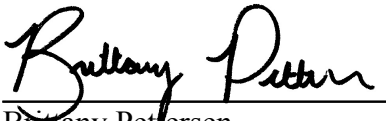
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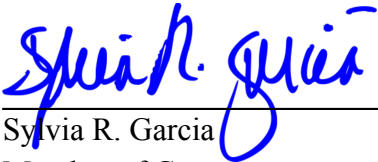
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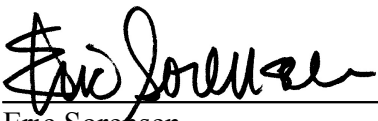
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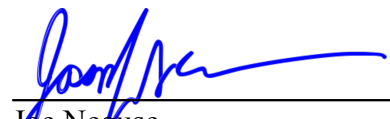
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