



***US Partner in the Global
Stop TB Partnership***

Stop TB USA is a social movement organization committed to eliminating tuberculosis (TB) in the United States and worldwide by advocating for better treatments as well as greater awareness and more resources for those affected. Our eight workgroups empower community members to work toward TB elimination by bringing accurate and up-to-date information to the public. These proposed changes would impede our goals and in turn, the common good.

We ask you to cancel these proposed changes, in particular due to the lack of experience of the current National Science Board members who will be responsible for governing Guides 4 and 8. In April 2026, the Administration fired the entire membership of the National Science Board who oversaw the NSF. Previously the board served as an independent body of advisors on science policy, and the NSF should not make any significant changes to science policy without reinstating those fired and gaining their approval for any changes.

We ask you to cancel these proposed changes, in particular due to Guide 12 which calls for disallowing the funding of publications, per the proposed OMB regulation changes (OMB revisions to 2 CFR 200 [OMB-2026-0034]). Publication is a critical aspect of TB research: this is how we continue to expand knowledge and ensure that patients receive appropriate treatment. If researchers cannot pay publication fees, then we will need to fund the same research again or not gain the benefits of the research. Research paid for by US taxpayers should be available to taxpayers, not buried within one institution.

We ask you to cancel these proposed changes, in particular due to elements of Guide 18A and Guide 23B which reflect the aforementioned proposed Office of Management and Budget (OMB) regulation changes. Implementing changes in advance – especially those based on a proposal facing congressional opposition as well as several hundred thousand comments from the public – most also in opposition – is a waste of taxpayer resources as the work will need to be redone once the OMB rule has been finalized.

We ask you to cancel these proposed changes, in particular due to Guide 25A which makes any research prone to immediate cancellation under the pretext of “protecting the interests of the government”--effectively at will, based on the whim of the current administration. This also aligns with the OMB regulation changes which again, are still simply proposals. Research related to tuberculosis (TB) requires several years’ consistent data collection and analysis, which in turn depends on stable grants. At-will termination based imperils all TB research.

We ask you to cancel these proposed changes, in particular due to Guide 17. Removing accomplishment-based renewals and reinstating a renewal process leads to additional unnecessary administrative costs, contributing to an increased lack of efficiency.

We ask you to cancel the proposed changes in Guide 20, in particular due to the historical record of zero disease outbreaks caused by laboratory research work in the US. Adding these restrictions on top of proven protocols only hinders our essential infectious disease research.

We do support the revision of moving the *de minimis* to the 15% cost rate to align with the finalized language of 2 CFR 200.

We would also like to note that Congress never gave [1], the National Science Foundation (NSF) the ability to regulate American colleges, universities and other academic research institutions by means of research collection. Over a 34-year span, beginning in 1991 and going through the last year, we’ve seen 324 changes to requirements related to federal grants, two-thirds of which have come in the last 10 years.

In summary, with the exception of the aforementioned *de minimis* increase, we ask you not to implement any of these mentioned changes. This rule would impede research processes and policies that led to successful TB scientific advancements in the past.

1. <https://www.law.cornell.edu/supct/pdf/99-1257P.ZO>