



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

Stop TB USA is a social movement organization committed to eliminating tuberculosis (TB) in the US and worldwide by advocating for better treatments, awareness, and resources for those affected. Our eight work groups empower community members to advocate towards TB elimination and spread awareness by bringing accurate and up-to-date information to the public.

We ask you to cancel this proposed rule, in particular due to section §200.218. Research on health disparities aids in contact tracing, providing accessible treatment, and preventing epidemics.

We ask you to cancel this proposed rule, in particular due to sections §200.220 and §200.202(e). Partnerships with international organizations have been pivotal for TB prevention and progress, and remain necessary to reduce its threat to US interests and abroad. Sections §200.220 and §200.202(e) would disrupt these partnerships, effectively halting progress towards TB eradication.

We ask you to cancel this proposed rule, in particular due to section §200.205. A political appointee with the ability to prevent any scientific advancement on topics that don't align with the current administration's ideologies would waste political expertise on scientific decisions and reduce transparency in America's scientific endeavors. Pivotal research projects will become especially vulnerable as priorities will continue to change in the White House. Expert peer review is instrumental in the research process, ensuring the quality of research output, building credibility and trust, and providing accurate information. If peer review is no longer binding, this quality control and academic trust would be lost in the scientific community. "Gold Standard Science" is undefined, giving the political appointee free reign and the power to dismiss institutional grants that do not align with the administration's personal beliefs, further reducing transparency. An undefined "Gold Standard Science" shows a lack of understanding that different scientific questions require diverse scientific methodologies.

We ask you to cancel this proposed rule, in particular due to section §200.340. A vast majority of TB research is completed through multi-year research and clinical trials, given the nature of the disease and the time required to see whether treatment is effective. Halting a research grant in the middle is

effectively a death sentence for those receiving treatment in clinical trials. Stopping clinical trials midway does not allow clinical researchers to understand if the therapeutics were effective, wasting the efforts already invested while also causing pain and suffering to the patients involved.

We ask you to cancel this proposed rule, in particular due to section §200.202(e) and §200.303. For diseases like TB that are more common abroad, clinical trials require recruitment internationally. This brings new diagnostics, treatments, and discoveries for the US, while also bringing in more jobs in the US. These sections also discourage universities and research institutions from hiring the most qualified people onto research teams and encouraging discrimination based on national origin. Given the international prevalence of TB, having global partners contributing to such grants provides valuable insight in making scientific progress towards TB eradication. A “domestic-first” framework would significantly reduce scientific innovation and competitiveness on a global scale.

We ask you to cancel this proposed rule, in particular due to sections §200.206 and §200.450, which are blatant violations of our First Amendment rights.

We ask you to cancel this proposed rule, in particular due to section §200.303. It is unrealistic for anybody working for the OMB to develop the necessary expertise to understand the impacts of regulations on infectious diseases like tuberculosis.

We ask you to cancel this proposed rule, as section §200.204 clearly invites corruption and a lack of transparency.

We ask you to cancel this proposed rule, in particular due to section §200.432. Conferences remain a key opportunity for researchers, clinicians, and patients with lived experience to share expertise and gain feedback on current research. This section is short-sighted because effective research requires testing your findings and comparing them with the results of others, which is often effectively obtained with the networking opportunities that conferences provide.

We ask you to cancel this proposed rule, in particular due to sections §200.454 and §200.461. Replicability is an essential piece of science. It is extremely difficult to understand what scientific work to replicate and, as a result, validate, without access to what other scientists have already

found. Subscriptions to academic journals provide researchers with accurate scientific foundations to base their research on.

In summary, we ask not to implement any section of this proposed rule. This rule would negatively affect every part of the research process that has contributed to successful tuberculosis scientific advancements in the past.