

The Honorable Susan Collins
Chair, Committee on Appropriations
United States Senate
413 Dirksen Senate Office Building
Washington, DC 20510

Dear Chair Collins:

On behalf of the Endocrine Society and our membership of approximately 18,000 scientists, clinicians and allied healthcare professionals, I am writing to thank you for calling attention to significant problems with the Office of Management and Budget's (OMB) proposed revisions to 2 CFR Part 200, the Regulation for Federal Financial Assistance, also called the Uniform Guidance. Your July 6 letter urging OMB to withdraw certain harmful provisions and extend the comment period is an important intervention by an elected official, and we are grateful for your leadership.

Your letter illustrates many of the same concerns the Endocrine Society raised [in our own comments](#) to OMB. We are particularly aligned on the following points:

- **Displacement of scientific merit-** We agree that requiring political appointees to conduct a pre-issuance review of whether an award “demonstrably advance[s] the President’s policy priorities” would undermine the United States Congress’ objective of funding research based on scientific merit.
- **Mid-award termination authority-** We share your concern that permitting termination whenever an award is no longer deemed “in the interest of the Federal agency”—including on the undefined “national interest” standard—would inject damaging uncertainty into multi-year scientific projects. We strongly agree that researchers cannot plan, hire, or make long-term commitments to patients in clinical trials in an environment where grants are subject to immediate termination on undefined grounds.
- **New administrative burdens-** We also assert that requiring written justification for every payment and drawdown request is redundant and would impose significant administrative burdens that would disproportionately impact smaller institutions—directly contradicting OMB’s own stated goal of reducing recipient burden.

We are extremely concerned that OMB intends to advance this sweeping rule on an accelerated timeframe as it proposes to implement these and other harmful provisions on October 1, 2026, after a comment period of just 45 days. A change of this magnitude demands meaningful stakeholder input, including from Congress, professional organizations such as the Endocrine



Society, and individual citizens; the compressed schedule does not allow for meaningful, substantive engagement and information gathering.

Thank you again for your leadership on this critical issue. Should OMB move forward with this proposal, we would welcome the opportunity to work with you and your staff on further Congressional efforts to intervene and prevent this rule from moving forward. Please do not hesitate to contact Endocrine Society staff at rgoldsmith@endocrine.org to facilitate further discussion on this important issue.

Sincerely,

A handwritten signature in black ink, appearing to read "Nanette Santoro".

Nanette Santoro, MD
President, Endocrine Society