



July 13, 2026

The Honorable Russell Vought  
Director  
Office of Management and Budget  
Washington, DC 20503

**Re: OMB-2026-0034, Office of Management and Budget Regulation for Federal Financial Assistance**

*Submitted via [regulations.gov](https://www.regulations.gov)*

Dear Director Vought,

The Friends of NIMH writes collectively as a coalition of professional societies and patient advocacy organizations dedicated to supporting the mission of the National Institute of Mental Health (NIMH), the primary federal agency responsible for funding mental health research. We appreciate the opportunity to submit public comments regarding the proposed revisions to the Guidance for Federal Financial Assistance. Our primary concern is ensuring that the final guidance maintains the scientific integrity, predictability, and efficacy of federally funded mental health research.

**1. Maintaining Scientific Peer Review and Award Stability (§200.205, §200.340, and §200.341)**

The field of mental health science is currently positioned to achieve significant progress, particularly regarding the neural circuits underlying behavioral health symptoms, the genetic factors in mental illness, and social and environmental contributors to health outcomes. Continued progress relies heavily on a predictable, merit-based funding environment. We recommend removing the proposed provision requiring non-scientific administrative approval for individual scientific grants (§200.205). The evaluation of scientific merit requires comprehensive technical expertise and familiarity with complex methodologies across diverse disciplines. Introducing non-technical review layers risks delaying the dissemination of funds and decoupling awards from established, objective peer-review standards.

Similarly, we recommend maintaining current standards for grant termination (§200.340 and §200.341). Broadening the criteria for terminating active grants introduces operational uncertainty for research institutions, which can disrupt multi-year clinical trials, impact ongoing

longitudinal studies, and complicate research into novel interventions with enhanced efficacy and minimized side effects.

## **2. Evaluating Health Disparities and Specific Populations (§200.218)**

We recommend the removal of the provision prohibiting federally funded research from evaluating disproportionate health impacts on specific populations (§200.218). Given finite federal research resources, data-driven analysis of health disparities across demographic groups is necessary to optimize funding efficiency and public health outcomes. Restricting researchers from studying these variances impacts the ability to address conditions affecting specific cohorts, including individuals with disabilities secondary to mental illness. Furthermore, this restriction directly conflicts with current, established federal research strategies—such as the National Institutes of Health (NIH) unified strategy—which emphasize solution-oriented approaches to improving health outcomes in specific populations.

### **Conclusion**

To ensure that federal financial assistance continues to effectively support rigorous, objective science that meets national mental health needs, we urge OMB to consider these adjustments prior to finalizing the rule. We remain available to provide further technical insights as needed.

Sincerely,

Friends of NIMH