



Association for Academic Pathology

Promoting Excellence In Academic Pathology

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July 13, 2026

The Honorable Russell Vought Director
The Office of Management and Budget
725 17th Street, NW
Washington, DC 20503

Re: Regulation for Federal Financial Assistance, Docket Number: OMB–2026–0034 Submitted
via [regulations.gov](https://www.regulations.gov)

Dear Director Vought:

The Association of Academic Pathology (AAPath) appreciates the opportunity to submit comments. AAPath is a non-profit society that serves as the voice of U.S. academic departments of Pathology. AAPath provides leadership and advocacy for the discipline of Pathology, and enables departments to meet demands of education, research, and clinical practice.

Pathology departments at US medical schools examine cause and source of disease clinically and via experimental and translational research. Pathology is the 6th highest recipient of NIH grants out of 44 medical disciplines with ~\$840M in funding per Blue Ridge Institute ([ByDepartment_2025.xlsx](#)). OMB–2026–0034 proposed restrictions could threaten our population’s health, as well as our national security.

§ 200.202(e) (International elements), § 200.220 (International collaborations): Many diseases are more prevalent in other countries; international collaborations are key. An example is tuberculosis (TB), once a common life-threatening disease in the US, but now largely controlled. Travelers and newcomers are re-introducing TB into the US, Including drug-resistant forms. TB is also a potential agent for biologic warfare. At UC Davis Health Pathology, a study with India funded by the recently cancelled USAID led to a new more accurate blood test for active disease allowing earlier diagnosis and treatment (([Advancing global health: UC Davis test identifies active, infectious form of TB](#))). Restricting such collaborations will restrict ability for breakthroughs like this. Non-communicable diseases are also a growing threat globally and in the U.S. Collaborators at Medical College of Wisconsin, Cleveland Clinic, and Basic Health International conduct NIH funded research to reduce cervical cancer in low-income countries by developing a low-cost HPV-test and thermal ablator to replace costly colposcopy, biopsy, and surgery. Clinical trials conducted in Central America and China where poor patients have no access to advanced medical care, unlike U.S., showed that HPV testing and ablation procedures were non-inferior to costly therapies used in the U.S. Not only could this save health care dollars in the United States, thermal ablation reduces the risk of cervical insufficiency (a complication causing premature delivery and pregnancy loss) to virtually zero.

§ 200.218 (Disparate Impact): AAPath, the field of pathology, and other specialties have benefited from NIH-funded research focusing on women and minorities in leadership. AAPath past-president Lydia Howell was co-PI of a \$1.27M NIH grant (NIH RO1 GM088336-01) examining women’s careers in biomedical science and published reports on effects of unconscious bias as well as strategies to support women’s careers. Studies like these have changed the academic culture and

increased access to a substantial pool of talent that was under-utilized, as evident in the rising trajectory of women in chair positions (AAMC, [U.S. Medical School Department Chairs by Chair Type and Sex](#)).

§ 200.461 (Publication and Printing Costs) & § 200.432 (Conferences): Publication in journals and presentation at meetings are the primary source of dissemination of new knowledge. Without grant support, dissemination would be severely restricted, crippling application of research advances in prevention, diagnosis and treatment. AAPath maintains its own journal, *Academic Pathology*, and is deeply concerned that there are few alternatives to defray publication cost and dissemination without grants.

§ 200.340 (Termination and Suspension): NIH training grants are investments in workforce development. Their success depends on stable institutional environments, long-term mentorship, and predictable administrative processes. OMB should clarify that federal agencies consider this distinct purpose and structure of training awards when conducting applicant risk assessments to avoid imposing administrative conditions that unnecessarily delay trainee support and minimize long-lasting effects on career and workforce development.

§ 200.205 (Federal Agency Review of Merit of Proposals): We have deep concerns that expanded pre-issuance review of funding decisions or reducing the role of scientific review panels could weaken the federal research enterprise. Rigorous, independent peer review to evaluate scientific merit, investigator qualifications, innovation, feasibility, and impact has been key to U.S.' global leadership in biomedical research and allowed taxpayer investment to support the most promising science. While agencies appropriately retain final funding authority and must consider programmatic priorities, public health needs, portfolio balance, and statutory requirements, decisions have been informed by expert scientific review using independent panels with subject-matter expertise. Preserving this balance is critical.

We hope that you will give serious consideration to our comments and rescind this proposal.

Sincerely,

Lydia P. Howell MD
Deputy Director, Association for Academic Pathology
Distinguished Professor & Chair Emerita, Pathology & Laboratory Medicine, UC Davis Health