

July 8, 2026

To: Office of Management and Budget**Re: Response to Regulation for Federal Financial Assistance (Docket OMB-2026-0034)**

The American Historical Association (AHA) submits this comment on the proposed rule Regulation for Federal Financial Assistance (Docket OMB-2026-0034), published May 29, 2026. The AHA is the world's largest association of professional historians, representing 10,000 members across all 50 US states and territories.

For decades, nonpartisan federal grants have allowed professional historians to bring history to the American people. In 2023 and 2024, current and former AHA members received 348 grant awards from the National Endowment for the Humanities (NEH) alone, supporting innovative research that greatly enriched our collective understanding of the past through projects, publications, and teaching.

The AHA is deeply concerned that this proposed rule would weaken the nation's research enterprise and diminish US leadership in scholarly research. In the historical discipline, the rule would reduce this nation's ability to produce the evidence-based scholarship that informs education, public policy, cultural institutions, and public understanding of the past. As such, we request that OMB:

- not finalize §200.205 as proposed
- retain the existing compliance-based standard in §200.340
- remove the "domestic-first framework" requirement from §200.202

Each of these provisions, addressed in turn below, would impose requirements that conflict with the statutory basis for federal humanities funding, undermine the merit-review process that protects the integrity of taxpayer investment in research, and introduce compliance standards too vague to apply consistently. Although the AHA has concerns about the proposed rule in its entirety, we focus this comment on the three provisions that would present especially significant consequences for historians, historical research, and the integrity of the federal support for scholarly research.

I. §200.205 and §200.205(d): Political appointee pre-issuance review and the elimination of binding peer review.

Section 200.205 of the proposed rule would require a senior political appointee to conduct a pre-issuance review of every discretionary grant award before it is issued, with the stated purpose of ensuring that awards advance the president's "policy priorities" and comply with applicable prohibitions.

Merit review is the accountability mechanism, not an obstacle to it. The current Uniform Guidance limits pre-award review to compliance determinations conducted by career agency officials. That structure reflects a deliberate policy choice, codified over decades of federal research administration, that the allocation of research

funds should rest on methodological rigor and scholarly merit as evaluated by qualified experts, not on alignment with the policy priorities of any administration.

The proposed revision eliminates that structural protection without demonstrating that the existing process has failed to serve the public interest. The proposed change also is inconsistent with the statutory grantmaking frameworks Congress established for agencies such as the National Endowment for the Humanities (20 U.S.C. §§ 956–957) and the National Historical Publications and Records Commission (44 U.S.C. §§ 2502–2504). These frameworks were designated in legislation adopted by Congress, signed by previous presidents, and implemented by all previous administrations since the creation of the relevant agencies. Those statutes assign responsibility for grantmaking to designated officials and expert bodies, supported by long-standing merit-review processes that rely on subject-matter expertise to fairly evaluate applications. Requiring an additional level of review by senior political appointees outside these established frameworks would depart from the decision-making structures Congress prescribed and undermine the independence and integrity of federal grantmaking. An OMB-level regulation of grant administration procedures does not carry authority to alter the substantive selection criteria that Congress established in agency-specific authorizing legislation.

The consequences of politicizing grant review and possible rescission of existing grants on political grounds are not hypothetical. More recently, the termination of awarded NEH grants in 2025 demonstrated that applying nonscholarly criteria to funded projects disrupts ongoing research, causes undue hardship to grant recipients who have made career decisions and forgone other opportunities based on receipt of a grant, strains committed institutional resources, and does not produce the savings or accountability it purports to achieve. During litigation challenging the grant terminations by the NEH, discovery materials [revealed](#) that employees of the Department of Government Efficiency (DOGE), who lacked expertise in the humanities and the NEH’s own grantmaking process, relied on ChatGPT to identify awarded grants supporting “DEI” and used the responses to recommend the termination of thousands of grants. These grants had been through a rigorous peer review process by subject-matter experts, but the recommendation to terminate them was made by non-subject-matter experts using ChatGPT. The terminated awards ranged from replacing an HVAC system (which ChatGPT deemed DEI for “providing greater access to diverse audiences”), to a documentary on violence against Jewish women in the Holocaust (“contributing to DEI by amplifying marginalized voices”), to compiling the papers of Albert Einstein (“providing access to diverse perspectives and promoting intellectual inclusivity”). These terminations had enormous implications for organizations and individuals all over the country, as well as their local communities. Relying on qualified subject-matter experts and established peer-review processes is essential to keeping the federal funding process merit-based and equitable.

This concern does not cut in only one party’s direction. The same discretion that could be used to defund institutions or scholarship disfavored by the current administration could be turned against military history programs, religious and classical education initiatives, or other conservative-aligned scholarship under a future administration. Removing binding peer review does not protect any side of the political spectrum; it eliminates the structural safeguard that has protected rigorous, nonpartisan scholarship from favoritism and political interference across administrations of both parties. Such a change would also create enormous inefficiencies and unpredictability by potentially changing the criteria for grant approval every four years.

The AHA requests that OMB not finalize §200.205 as proposed, and instead retain the existing standard limiting pre-award review to compliance determinations by career agency officials.

II. §200.340: Discretionary Termination of Awards

Section 200.340 of the proposed rule would allow federal agencies to terminate grant awards at their discretion if an award “does not effectuate program goals, federal agency priorities, or the national interest as they exist at the time of termination.” This standard is explicitly prospective: an award that fully complied with all requirements at the time it was made could be terminated because agency priorities have since changed. The current Uniform Guidance limits termination to noncompliance, mutual agreement, or statutory authority.

Aside from the adverse effect such an approach would have on the reputation of the US government as a trustworthy contracting partner, award stability is a prerequisite of scholarly output, not a benefit to recipients. The proposed standard would destabilize the research environment on which rigorous historical scholarship depends. Awarded grants support commitments that cannot be unwound without cost, including graduate student appointments, archival access agreements, and oral history contracts with participants. When an award is terminated mid-project, those commitments are stranded. Unlike laboratory research, much of the raw material of historical inquiry does not hold between funding cycles: archives close access windows, interview subjects become unavailable, and assembled research teams disperse. The proposed at-will termination standard would make federal grants functionally unusable for long-horizon research because no institution could responsibly make those downstream commitments. The instability created by at-will termination is not merely disruptive. In many cases, it is irreversible.

The 2025 termination of awarded NEH grants demonstrated these harms at institutional scale. Local history centers and community-based projects closed, producing negative economic impacts on the communities they served. The Federation of State Humanities Councils [reported](#) in August 2025, “For more than 50 years, humanities councils have received Congressionally-mandated operating grants through the NEH, which make up a foundational portion of each council’s annual budget. These grants were terminated overnight, with no advanced notice or opportunity for councils to plan for new funding models. . . . [C]ouncils have received less than half of what was intended for them in 2025, resulting in the **pause or cancellation of over one third of programs and over 60% of all council grantmaking programs**. These grant programs fund vital cultural infrastructure like local museums, rural libraries, and community nonprofits.”

These impacts extended well beyond the immediate loss of grant funds. As just one example, K–12 teachers who had been accepted to summer teacher institutes were not able to benefit from those programs. The AHA’s own institute on teaching Africa in world history for K–12 teachers was among those terminated; the AHA had proposed the institute in direct response to a need identified by teachers across the country. The 2025 NEH grant terminations did not reduce federal expenditure efficiently; instead, it stranded committed institutional resources, eliminated the research outputs taxpayers had already funded in part, and produced no documented improvement in program outcomes. Expanding the conditions under which mid-award termination can occur to all federal discretionary grants would replicate those harms across the full breadth of federally-funded research.

The AHA requests that OMB retain the existing standard limiting termination to noncompliance, mutual agreement of the parties, or specific statutory authority, and not finalize the “national interest” and “agency priorities” termination grounds as proposed.

III. §200.202: Program Design Requirements and the “National Interest” Standard

Section 200.202 of the proposed rule would require that all federally funded projects be designed around a “domestic-first framework” and demonstrate that they are “in the national interest of the United States.” Neither term is defined in the proposed rule, nor is it clear how such demonstration would be achieved. The current Uniform Guidance imposes no such requirement on program design.

All historians—not solely those who research other parts of the world—benefit from international exchanges. State-sponsored exchanges first arose in the aftermath of World War II and during the Cold War, when the United States and its allies promoted international education with the goal of sharing knowledge between nations, strengthening international ties, and promoting global stability, all in the interest of national security and diplomacy.

An undefined “national interest” standard creates a compliance problem that neither applicants nor program officers can resolve in advance. A historian proposing a collaborative project with scholars in Germany, Japan, or Brazil cannot determine from the proposed rule text whether that collaboration satisfies the standard, fails it, or requires modification to meet it. Program officers face the same uncertainty in review. A compliance requirement that cannot be applied consistently is not a standard; it is discretion without criteria.

The leadership of the United States in research and scholarship is built on international engagement, not despite it. Restricting federally funded collaborations to a domestic-first framework would reduce the reach and quality of American historical scholarship without any demonstrated benefit to the research programs the rule is meant to govern. Historical scholarship necessarily relies on international collaboration, access to archives and collections abroad, and the exchange of expertise among scholars working across national boundaries. International students and scholars directly support state and national economies in the United States. In 2023, international students [contributed](#) \$43.8 billion to the US economy, through tuition paid to host universities, travel expenses, housing expenses, food and other taxable sale items, and visa fees.

International collaboration, including exchanges, plays a pivotal role in many aspects of historical study. The current, merit-based federal funding process ensures that students and scholars of all backgrounds have the ability to conduct research and collaborate with scholars in their fields. More than 45 programs sponsored by the Departments of State, Education, and Defense enable tens of thousands of educational exchanges each year. Sponsored exchanges range from PhD students conducting dissertation research, to master’s students undertaking degrees at international institutions, to distinguished scholars lecturing in the US and overseas; from K–12 teachers and administrators learning about education in other parts of the world, to future federal employees learning languages critical to national interests, to supporting children of veterans with international education, and more.

The National Endowment for the Humanities, the National Science Foundation (NSF), and other agencies have long encouraged international partnership programs and funding mechanisms to support significant research projects that require access to overseas archives and research centers, archaeological and historic sites, and that benefit from insights from experts around the world. Federal funding has supported landmark collaborative initiatives such as multinational Trans-Atlantic Platform projects, the Shakespeare Quartos Archive, the Transatlantic Archaeology Gateway, and many others. The NEH’s own website includes a section on [International Engagement](#) that states, “NEH’s international engagement with foreign governments, multilateral

organizations, and other international partners fosters global understanding and collaboration in the humanities.”

Given the central role of international collaboration in research, policies that would limit such partnerships risk undermining American scholarly competitiveness and innovation.

The NSF reported in its 2023 [Publications Output report](#), “An article is classified as an international collaboration if at least two author organizations are located in different regions, countries, or economies, as determined by their addresses on the article. In 2022, the United States contributed to the largest number of articles involving international coauthorship (241,823 articles, representing 32% of all internationally coauthored articles). . . . Researchers in the United States collaborated with international partners on 40% of their articles in 2022.” Imposing barriers to collaboration between American scholars and their international colleagues would impede the advancement of innovative research in the humanities and sciences, severely restricting the exchange of knowledge and access to expertise and crucial scholarly resources.

The AHA requests that OMB remove the “domestic-first framework” requirement and the undefined “national interest” program design standard from §200.202.

IV. Conclusion

The proposed revisions to §200.205, §200.340, and §200.202 would, individually and together, shift federal grant administration away from the merit-based, expert-driven framework that has sustained American research leadership for more than seven decades. For historical scholarship specifically, the consequences would be concrete: peer review displaced by political appointee approval, multiyear projects subject to termination without cause, and international collaborations constrained by an undefined compliance standard.

The AHA urges OMB not to finalize these provisions as proposed. We remain committed to constructive engagement with the federal grants process and welcome the opportunity to provide additional information or expertise in support of a final rule that preserves the integrity, stability, and independence of federally funded research.

Respectfully submitted,



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