MILLERS
ASSOCIATION

The Link Between Grain and Goodness

July 13, 2026

Honorable Russ Vought
Director
The Office of Management and Budget
725 17th Street NW
Washington, DC 20503
VIA Regulations.gov

Re: RIN 3133–AG07 / OMB-2026-0034, Regulation for Federal Financial Assistance

Dear Director Vought:

The North American Millers' Association (NAMA) respectfully submits these comments on behalf of our members. NAMA represents millers of wheat, corn, oats, and rye. Our members take raw grain and, through grinding and crushing, create flour and other products that are used to make favorite foods, such as bread, cereals, pasta, tortillas, cookies, cakes, and snack foods. We're proud to be the indispensable link between raw grain and healthy and delicious products that have sustained and enriched people's lives for centuries.

Continuous research is needed to support development of varieties of wheat, corn, and oats that produce the quantity and quality of grain necessary to feed America. Unfortunately, private investment in breeding wheat and oats is very limited, and developments that keep farmers producing high quality grains are largely made in the public sector by land-grant universities in America's heartland.

We write to express our strong opposition to Office of Management and Budget (OMB)'s proposed Regulation for Federal Financial Assistance, released on May 29, 2026, and urge OMB to withdraw the proposal. Although we support OMB's objectives of improving transparency, accountability and stewardship of federal financial assistance, we have significant concerns with several of the provisions within the proposed rule and their implications to corn, wheat, and oat research, which we have outlined below.

1. *The role of scientific peer review in discretionary awards* [§ 200.205(B)]: Scientific peer review is foundational to the success of competitive federal research funding because it ensures awards reflect scientific merit and technical rigor best judged by subject-matter experts. Proposed § 200.205(b)

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would require senior political appointees to conduct pre-issuance review of all discretionary awards, independent of and not bound by scientific peer review, which the proposed rule specifies remains merely "advisory." This inclusion of senior appointee review introduces vague, subjective, and non-scientific considerations. Furthermore, placing the opinion of an appointee over peers in their field diminishes the focus on gold standard science, and makes this review about something other than the scientific merits. Wheat, corn, and oat research should be based on the science needed to produce the best quantities and qualities of these crops.

2. *Expanded discretionary termination and suspension authority* [§§ 200.340–343]: Allowing agencies to terminate or suspend awards for up to 90 days whenever "in the interest of the Federal agency" introduces great uncertainty and risk to agricultural research. Investments made into those projects, whether through establishment of trials, hiring of skilled technicians, or securing specialized laboratory equipment would lack the clarity and security necessary to efficiently support the work. These discretionary powers lack objective criteria or meaningful procedural protections that put research at risk of termination or suspension based on shifting policy priorities. Fighting diseases like fusarium headblight that change continuously takes sustained investment that requires a long-term commitment. A standard tying continued funding to a subjective, time-variable "national interest" assessment, with minimal notice and no appeal, is fundamentally incompatible with the time horizons on which agricultural science depends. For example, starting and stopping plant breeding limits gains we can achieve and restricts American farmers from having the best tools available to grow their crops. Plants growing in a field trial cannot just stop when an agency says so, and start back up again when someone decides the funding is important. Years are lost every time a field trial must be discontinued. We lose data, seeds, and the jump start we had on solving the problem.

3. *Foreign collaboration restrictions* [§§ 200.202(e); 200.220]: The prohibition on "covered foreign collaborations" jeopardizes legitimate international research partnerships that agriculture research relies upon. The breadth of proposed § 200.220 and the case-by-case justification requirements of § 200.202(e)'s domestic-first framework could threaten scientifically essential collaborations, such as pest and disease monitoring. Plant diseases do not recognize national borders. For example, pathogens can move long distances through air

currents and evolve in production regions around the world, threatening our thriving U.S. grain production. Partnerships provide an early-warning system that identifies emerging disease threats before they reach American grain growing regions. By leveraging global work against pests and disease, U.S. researchers can develop durable genetic resistance before the threats arrive, reducing risk to American oat, corn, and wheat farmers, and protecting the U.S. food supply.

4. *Cost allowability impacts to scientific communication and professional development* [§§ 200.432 and 200.461]: Peer-reviewed publication is the mechanism by which federally funded research is validated, disseminated, and made usable by other researchers, extension educators, producers, and industry. Significantly impacting a scientist's ability to cover the costs to publish their research (§ 200.461) only limits the public's access to the results from these federal investments and diminishes their prominence as global leaders in agricultural science innovation. Furthermore, the new requirement that conference attendance be expressly approved by the agency and written into award terms (§ 200.432) threatens the translation of science to the stakeholders that need it, farmers, and our value-added industries. Attendance at these meetings where federally funded researchers present results, receive peer feedback, generate new ideas and collaborations that result in stronger federal grant applications, and coordinate multistate projects is critical to maintaining the collaborative nature of the U.S. wheat research community. Requiring agency pre-approval for each instance of attendance, written into award terms in advance, would impose a significant new administrative burden on recipients and agency staff alike. It also limits the ability for scientists to be responsive to time sensitive matters, like evolving industry needs that were not foreseen when a grant application was initially drafted, often several years in advance. Our scientists must be able to share what they have learned by attending conferences with other researchers, farmers, and industry representatives across the value chain to best utilize the investment. This also means research results must be published in a timely manner for American farmers to benefit.

Ultimately, the specific concerns raised above cumulatively impact the ability for U.S. wheat, corn, and oats to maintain and sustain global competitiveness. The combined effect of unpredictable decision-making, funding instability, and restrictions on collaboration [§200.205; §200.340(a)(2); §200.220] will make the U.S. a less reliable partner in global innovation networks all while limiting the ability of our scientists to leverage the most timely and relevant advancements in science and technology. A stable, merit-based, and credible federal funding system is foundational to U.S. economic progress and leadership.

These proposed new conditions will hurt farmers and the American people by limiting federal investment in the research that makes it possible to feed people nutritious American grown grains. While everyone in the system loses in this scenario, the farmers are harmed the most, with the safe, secure food supply we know being threatened. The predictability of federal assistance with clear guidance and appropriate flexibility for agencies is essential to ensuring that qualified applicants continue to seek federal funding and carry out congressionally-authorized activities benefitting the American people.

Thank you for the opportunity to provide comment on the Proposed Rule. We appreciate your consideration.

Sincerely,

Molly Miller

Molly Miller
Vice President, Regulatory and Technical Affairs
North American Millers' Association