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**aaup**  
AMERICAN ASSOCIATION OF  
UNIVERSITY PROFESSORS

# **Welcome to the UCSF-FA & CUCFA OMB Comment-a-thon Agenda**

- Introduction to UCSF FA and CUCFA
- OMB proposed rule changes & comment process: what, when, how
- Brief breakout groups to get ready to write
- Write! Questions can be submitted during the writing period
- Wrap up and next steps
- Join your UC Faculty Association!

# The UC Faculty Associations and CUCFA

The **UC Faculty Associations** represent the economic and/or employment interests of UC faculty before the University at the campus and systemwide level.

- Long-standing employee organizations that advocate for UC faculty under the legal framework of the California Higher Education Employee-Employer Relations Act (HEERA)
- The UC Faculty Associations advocate in partnership with the Academic Senate, yet, unlike the AS, are legally authorized to lobby legislators and file lawsuits and amicus briefs independent of the UC

**CUCFA** (Council of University of California Faculty Associations) coordinates the 10 individual Faculty Associations and advocates on behalf of faculty interests to the California state government, UC Board of Regents, UCOP, UC Health leadership, etc.

# The UCSF Faculty Association

- Voluntary, dues-supported organization
- UCSF faculty members across **all** UCSF health schools
- Dedicated to the protection and improvement of the UCSF faculty working conditions and rights through advocacy for employment rights, including salary and benefits, academic freedom, shared governance, ability to fulfill our academic mission and provide high quality patient care.
- Partners with UCSF Academic Senate, UC unions & AAUP (American Association of University Professors)
- Join at <https://ucsffa.org/>

# Elizabeth Ginexi



Dr. Elizabeth Ginexi served the National Institutes of Health for 22 years as a Program Official, shaping biomedical and behavioral health research strategy.

- managed a portfolio of 305 grants totaling \$132 million
- co-authored 18 funding initiatives that generated 1,087 projects totaling \$778 million—mental health, substance use prevention, pain management, data science, and health services research.
- left NIH because she witnessed the new leadership replacing NIH's scientifically-driven system with one that is politically directed and violates the Public Health Service Act of 1944.

See her substack at: [elizabethginexi.substack.com](https://elizabethginexi.substack.com)

# The Rule That Would Politicize Every Federal Grant

What University Faculty and Staff Need to Know — and Do

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Elizabeth Ginexi, PhD  
Former NIH Scientific Program Official (2003–2025)

Comment Deadline

**July 13, 2026**

# What Is This Rule?

**\$1.1**

**TRILLION  
Every year**

## 2 CFR Part 200 governs:

Every federal grant

From every agency

To every recipient

**Including University campuses**

*Not just science grants — Medicaid, transportation, education, housing, and more*

# The Three Changes That Affect You Most

1

## Political Appointees Replace Peer Review

§200.205

Political appointees must personally approve every grant — and are forbidden from deferring to peer reviewers.

2

## Any Grant Can Be Canceled at Any Time

§200.340

Active grants can be terminated mid-project for political reasons. No misconduct required. No appeal.

3

## Research Must Align With White House Priorities

§200.202

Every grant program must be designed around administration priorities — not scientific need or congressional mandate.

# What Else Would Change for Researchers



Conferences require  
political pre-approval

**§200.432**



Journal subscriptions  
categorically banned

**§200.454**



Publication costs banned  
(conflicts with open access  
mandate)

**§200.461**



International collaboration  
prohibited

**§200.220**



Public communications  
and outreach restricted

**§200.421/450**



Grants denied based on  
organizational affiliations

**§200.206**

# It Has Already Started — This Rule Makes It Permanent



The EO pre-implemented many of these provisions at NIH.  
This rule makes them permanent and extends them to every federal agency.

# Why the Comment Period Matters

**01**

## OMB Must Respond

Under the Administrative Procedure Act, OMB is legally required to read every comment and respond to every significant one in writing before finalizing this rule.

**02**

## Builds the Legal Record

A strong comment record is what courts examine when this rule is challenged. Every documented harm from a real researcher strengthens the legal case.

**03**

## Signals Congress

Volume and substance of opposition tells Congress this rule is contested — supporting Congressional Review Act action and appropriations riders to block implementation.

# What Makes a Comment Powerful

## ✓ DO

- Write in your own words
- Name a specific provision (§200.205, §200.340 ...)
- Describe your specific research and the concrete harm
- State clearly: 'I request that §\_\_\_ not be finalized'

## ✗ DON'T

- Copy someone else's comment
- Submit a form letter
- Write only general opposition without citing a section
- Skip the closing request — OMB must respond to it

# Your Four-Part Comment Template

1

## Who you are

*"I am a [researcher / faculty member / postdoc] at UC [campus] working on [brief description]."*

2

## Which provision

*"I am writing to oppose §200.[XXX] which would [brief plain-language description of what it does]."*

3

## The concrete harm

*"If this provision takes effect, my [grant / collaboration / study] would [specific harm]. My [students / participants / data] would [specific consequence]."*

4

## Your request

*"I request that §200.[XXX] not be finalized. I urge OMB to withdraw this rule in its entirety."*

# Key Section Numbers to Cite

*Pick one or two that directly affect your work*

**§200.205**

**Political appointees override peer review**

**§200.340**

**Grants terminated for political reasons**

**§200.202**

**Programs must align with White House priorities**

**§200.220**

**International collaboration prohibited**

**§200.432**

**Conference attendance requires pre-approval**

**§200.454**

**Journal subscriptions categorically banned**

**§200.461**

**Publication costs banned**

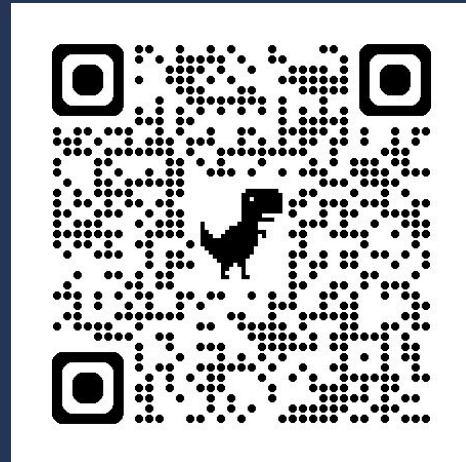
**§200.450**

**Public communications restricted**

# How to Submit Your Comment

1

Go to the link



2

Type or upload

Type in the text box (5,000 char limit)  
or attach a Word / PDF document

3

Name optional

You can submit anonymously  
Named comments from researchers carry more  
weight

4

Click Submit

Takes about 10 minutes total  
Save your tracking number

**DEADLINE: July 13, 2026 at 11:59 PM Eastern | <https://www.regulations.gov/commenton/OMB-2026-0034-0001>**

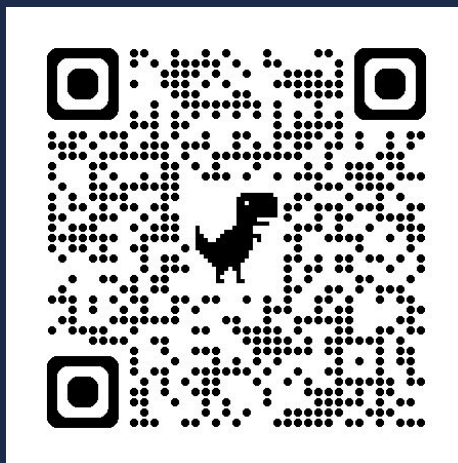
# Go Beyond the Comment



## Submit Your Comment

The most important individual action.  
Closes July 13. Your scientific testimony belongs  
in the legal record.

<https://www.regulations.gov/commenton/OMB-2026-0034-0001>



## Call Your Elected Officials

Ask them to support:

- Congressional Review Act resolution
- Appropriations riders blocking implementation
- Senate HELP & Commerce Committee oversight

# The deadline is July 13.

Your comment is *your scientific testimony.*

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**Submit:** <https://www.regulations.gov/commenton/OMB-2026-0034-0001>

**More reading:** [elizabethginexi.substack.com](https://elizabethginexi.substack.com)



# Let's Get Started!

**You will have 5 minutes to talk to help you get started...**

## **Please share:**

- Name, pronouns, UC campus, general field
- What main impact(s) would the OMB Rule Changes have on your work?
- Optional: question or concern you have about submitting a comment



**WRITE!**

- Choose the one or two sections you want to focus on
- Have questions? Ask an expert!

# Write your comment now! (see submission link in chat)

- "I am a [researcher / faculty member / postdoc] at UC [campus] working on [brief description]."
- "I am writing to oppose §200.[XXX] which would [brief plain-language description of what it does]."
- "If this provision takes effect, my [grant / collaboration / study] would [specific harm]. My [students / participants / data] would [specific consequence]."
- "I request that §200.[XXX] not be finalized. I urge OMB to withdraw this rule in its entirety."

Key Section Numbers to Cite		Pick
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§200.340	Grants terminated for political reasons	
§200.202	Programs must align with White House priorities	
§200.220	International collaboration prohibited	
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# What are your next steps?

## *goal: >1 million comments*

- ❑ Invite colleagues, mentees, patients to make comments
- ❑ Encourage professional and community organizations to submit comments
- ❑ Ask for a few minutes in your division/department/other group meeting to encourage others to submit
- ❑ Organize a comment-a-thon with friends or colleagues
- ❑ Write an Op-Ed about this to educate & encourage
- ❑ Other ideas?

# Join your Faculty Association

We advocate for faculty in partnership with the Academic Senate, yet we have additional tools available to us. We are legally empowered to lobby legislators and file lawsuits and amicus briefs independent of UC.

## UCSF Faculty Association



## Other UC Faculty Associations

