AMERICAN METEOROLOGICAL SOCIETY
45 Beacon Street, Boston, Massachusetts 02108-3693 USA
Amanda Staudt, PhD
Executive Director/CEO
astaudt@ametsoc.org
617-226-3907
amsinfo@ametsoc.org
www.ametsoc.org

AMS Expanded Comments on the Office of Management and Budget Proposed Rule on Regulation for Federal Financial Assistance

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Summary:

The U.S. weather, water, and climate enterprise is a public-private-academic partnership that works to benefit the American people by transforming research into operational forecasting, hazard warnings, emergency management, commercial weather and climate services, and economic decision support. Sustained federal investments have produced substantial improvements in forecast accuracy, lead time, and public safety. In addition, innovative applications and services are enabled across crucial sectors of our economy, including transportation, agriculture, energy, insurance, water management, and national security. Weather, water, and climate information supports robust decision-making in the financial sector on issues affecting billions of dollars annually. The American Meteorological Society (AMS) is concerned that the proposed revisions to title 2 of the Code of Federal Regulations (2 CFR Part 200) would lessen the effectiveness of these investments by reducing public access to scientific information relevant for decision-making, slowing the transition of research into operations, introducing uncertainty into long-term research and operations, weakening peer-review-based funding decisions, hindering research progress and innovation, and discouraging scientific collaboration.

About the American Meteorological Society (AMS):

AMS brings together researchers, forecasters, educators, and communicators across the public, private, and academic sectors, providing objective scientific insights and expert support. With more than 11,500 members, AMS is the trusted, nonpartisan convener for the weather, water, and climate enterprise. The Society publishes 12 scientific journals, holds major conferences and technical meetings, provides education and workforce development activities, and establishes professional standards.

Major areas of concern:

1. **Reduced public access to weather, water, and climate information as recipients of federal funding face new restrictions on public communication of their scientific knowledge and understanding.** (§ 200.450)

Weather researchers and practitioners frequently provide technical explanations of forecast confidence, evolving hazards, and emerging science through media interviews, public webinars, conference presentations, courtroom testimony, and social media. These activities improve public understanding of watches, warnings, probabilistic forecasts, and protective actions without constituting lobbying or political advocacy. Examples of critical weather, water, and climate information products that provide significant value to the public include: hurricane forecasts, tornado outlooks, flood warnings, wildfire smoke forecasts and associated air quality, and heat risk communication. Climate scientists also regularly communicate information to support planning and risk management, such as projections of prolonged drought and long-term sea-level rise. The proposed change to § 200.450 seeks to prevent federal awards from being used for “issue advocacy or public messaging that promotes or opposes a particular social, political, or public policy position unrelated to the statutory objectives or performance requirements of the federal award.” This includes “attempting to influence the executive branch of any state government on matters unrelated to the objectives or performance requirements of the Federal award, including attempts to affect State agency policymaking, rulemaking, or administrative actions for purposes other than carrying out objectives of the Federal award.” We are concerned that this proposed rule change would create ambiguity regarding allowable public communications, and thereby discourage timely and valuable dissemination of warnings and other technical information relevant for critical decision-making. Reduced public access to weather-related information would harm public preparedness and responses to routine and extreme weather events. For example, uncertainty about how to provide information to public audiences or state agencies about specific weather events (such as sharing of watches and warnings and response options) could result in delayed responses and diminished availability of information that could be used to avoid damage and personal injury.

Furthermore, this proposed change creates concerns for the communication of research results. Scientific communication to public audiences about hot-button public issues (such as the science of climate change or impacts of extreme weather events on specific populations or locations) could be mischaracterized as being political. Scientists who publish or speak to public audiences about their research results could face punishment or lose their federal funding. As a result, this rule change could have a

chilling effect on the free expression, sharing, and debate of scientific results and ideas. It also diminishes the transparent and open sharing of federally funded research results and infringes on award recipients' freedom of speech.

2. **Reduced commercialization potential due to restrictions on the use of government funding to attend meetings where opportunities for researchers to engage directly with the private sector abound.** (§ 200.454, and § 200.432)

The U.S. weather, water, and climate enterprise provides significant return on federal investments in research in part because of effective mechanisms to transition research findings into operations and enable commercialization of innovations in algorithms, instrumentation, and forecast systems. For example, industry partners are critical to developing and deploying instruments used to observe the Earth system, both from ground-based systems and from satellite platforms. Furthermore, many companies, both big and small, are developing sophisticated data and forecast products that provide tailored information to support economic sectors, such as agriculture, insurance, electricity, and transportation. Scientific journals that publish research results, as well as conferences that bring together a broad range of professionals with shared interests, are critical mechanisms for enabling broad dissemination of research results, networking, and connections. These, in turn, lead to collaborations and efficient translation of research to operations (R2O) and commercial applications.

Under the proposed changes to § 200.432, attendance at conferences is an allowable cost "only if participation in the conference is expressly approved by the agency and included in the terms and conditions of the award." The revision states that "recipients are not authorized to attend conferences using Federal funds that do not serve to advance program outcomes." We are concerned that this proposed rule would diminish the potential for private sector companies to meet and interact directly with scientific researchers, thereby harming the transfer of scientific advances into commercial products and marketable goods and services.

The proposed changes to § 200.454 make unallowable "the costs of subscriptions or memberships in country clubs or organizations whose primary purpose is lobbying or issue advocacy". We are concerned that this proposed rule would affect the ability to use federal funds to subscribe to scientific journals published by professional societies. Journals published by AMS and other scientific societies play a critical role in disseminating research results that are considered highly credible, employing rigorous review processes used to screen articles. The costs of reviewing and publishing manuscripts submitted by scientists are supported in part by subscriptions. The

proposed rule creates uncertainty about whether such subscriptions would be allowable because it is unclear how it would be determined if the primary purpose of an organization is issue advocacy.

3. **Reduced emphasis on scientific merit for grants, as political appointees may prioritize political interests and may not possess state-of-the-art technical knowledge and understanding with respect to science.** (§ 200.202(a)(iii), § 200.205)

Similar to other areas of science, merit-based review processes are a cornerstone to ensuring that federal investments in weather, water, and climate research projects, instruments, computer systems, and data products are technically strong and expected to yield useful results. Furthermore, many areas of active inquiry in these disciplines require multiple years or even decades of steady observations and research to make breakthroughs. Significant shifts in federal science priorities every few years make it nearly impossible to sustain major long-term observations and research efforts.

The proposed changes to § 200.202(a)(iii) would require federal agencies to design programs with clear goals and objectives that "align with administration policies and priorities." Proposed changes to § 200.205 would require senior appointees to conduct a "new pre-issuance review process" by which they would evaluate whether "discretionary awards advance the President's policy priorities," among other things.

We are concerned that adding a new pre-issuance review process would diminish the importance of peer review when making federal awards for research projects and other investments with substantial technical requirements (e.g., satellites, radars, high-performance computers), potentially resulting in awards being made for technically inferior proposals or for projects that prioritize interests of the current administration at the expense of research that could have larger benefits over the longer term. Political appointees may not have the detailed technical expertise in weather, water, and climate science needed to make decisions based on scientific merit. Indeed, proposal selection benefits by seeking input from multiple reviewers who bring a range of expertise related to the subject. This is especially true for weather, water, and climate science given the increasing complexity and multidisciplinarity of cutting-edge research topics. Furthermore, inserting political appointees into the review of scientific proposals could also create conditions that enable retaliation, retribution, and suppression of science and scientists based on perceived impact on political views or special interests.

Many areas of weather, water, and climate research depend on stable and extended effort over longer periods of time than any administration serves. For example, typically,

years of observations of specific weather phenomena are required to collect enough data to have statistically significant samples that enable broader insights to be developed. Unlike science disciplines that can conduct experiments many times over in a laboratory or through a controlled field experiment, meteorologists must often wait for the atmosphere to create conditions that allow the testing of hypotheses. For rare, severe weather events that can have the most significant impacts on life and property, data collection can take years or decades. Detecting statistically significant changes in the Earth system, similarly, is a multidecadal endeavor. Having to repeatedly adjust observational systems or research efforts to the priorities of new administrations will create instability for scientific research, making it more difficult to plan and implement. Grantees would have to operate in a shifting environment, as each new administration could make significant changes.

This new pre-issuance review process appears to contradict the characteristics of "Gold Standard Science" outlined in Executive Order 14303 ("Restoring Gold Standard Science" 90 Fed. Reg. 22601, [May 29, 2025]). Specifically, the EO states that federally conducted science should be "subject to unbiased peer review." Adding an additional pre-issuance review process as described in the proposed changes to § 200.205 would empower political appointees to override the recommendations of technical merit review conducted by experts, creating situations in which political priorities or other factors are weighed more heavily than scientific merit.

We are also concerned that the proposed pre-issuance review process would create potential bottlenecks in the distribution of federal resources. Federal agencies typically awarded more than 2,000 competitive research grants and cooperative agreements supporting weather, water, ocean, atmospheric, and climate science each year during FY2015-FY2024. Requiring senior appointees to review all of these awards, along with awards being made to other areas of science, would likely require significant time, leading to delays in funding decisions. Such delays could be particularly detrimental for time-sensitive research, such as post-event analysis after weather disasters.

4. **Reduced stability for projects requiring sustained effort and investment (e.g., long-term observations, long-running research projects, and training of the future scientific workforce) as political winds and interests shift.** (§ 200.211, § 200.340, § 200.341, § 200.342, § 200.343)

The American public has benefited tremendously from sustained federal investments in the weather, water, and climate enterprise, be it through awards at academic institutions, long-term monitoring of critical observations, or research infrastructure such as data assimilation systems and computing. For example, long-term research and

development support for researchers at universities and large research centers has been critical for the development of next-generation weather prediction models, including the core of the National Weather Service's forecast system, as well as the development of radar and satellite instruments, long-term calibration of observations, and multidecadal networks of ground-based weather stations. Such advances cannot be planned or executed if research priorities are expected to shift substantially every four years. The proposed changes to 200.340(a)(2) state that a federal award may be terminated "if the Federal agency or pass-through entity determines that a termination is in the interest of the Federal agency or pass-through entity, including if a Federal award does not effectuate program goals, Federal agency priorities, or the national interest as they exist at the time of the termination." Proposed changes to 200.211, § 200.341, § 200.342, and § 200.343 provide additional detailed instructions about how federal agencies can terminate grants. While the federal government already has the ability to terminate funding awards under extenuating circumstances, the proposed changes would give political appointees more power to terminate grants early if the project is deemed to no longer serve the current agency priorities or the current national interest.

We are concerned that this rule change creates potential for the disruption of projects requiring long-term and sustained investment, and a more cautious approach to planning future projects. Scientists and institutions would likely opt to propose more limited, shorter-term projects as a way to manage risks to their financial stability or workforce that would come with accepting longer-term funding awards that could be abruptly defunded.

Field campaigns are an example of the type of bold project that the proposed rules could discourage. These projects bring together large teams of researchers, often with specialized instrumentation, to collect focused observations of a specific location or phenomenon using carefully designed observation strategies. Often, they may be designed to intensely collect data in a location for years or decades, or to bring a standard set of instrumentation to numerous different locations over multiple years. They are crucial for advancing understanding and typically lead to major insights that would not be possible without the broad deployment of research assets and collaboration over many years. These campaigns require years of planning, collaboration among dozens of scientists across multiple institutions, and coordination of major research infrastructure such as research aircraft, mobile observing stations, and satellite-based instruments. Unfortunately, the potential for a midproject termination of a field campaign would discourage that kind of intense, sustained planning and implementation. Furthermore, an unexpected termination of field campaigns already underway could permanently compromise the scientific value of observations that cannot later be recreated. The threat of early termination of awards due to a mismatch

with current administration priorities would also pose significant challenges for many research programs in meteorology and the related sciences because they depend on uninterrupted observations extending over decades. For example, studies of changing precipitation extremes, drought frequency, sea level rise, and heat waves require consistent data collection and analysis across multiple administrations. Research priorities that shift substantially from one administration to another limit the nation's ability to detect emerging risks. Interrupting long-term observations or multiyear modeling projects may permanently reduce the scientific value of the foundational data sets because missing observations cannot later be reconstructed. Unlike many research fields, the value of climate observations often increases with the length of the record. A 50-year observational dataset provides substantially greater scientific and practical value than a 20-year record because it enables more robust detection of long-term trends, changes in variability, and the frequency of rare extreme events. Policies that increase instability in long-term research funding therefore diminish not only future discoveries but also the value of prior federal investments.

Finally, we are concerned that the potential for early termination of awards could hinder the training of future scientists and technically proficient professionals in the weather, water, and climate enterprise by making faculty advisors more conservative when deciding whether to accept students or open postdoctoral positions. Although national enrollment data specific to weather, water, and climate graduate programs are not yet available, early evidence of graduate enrollment across all disciplines indicates that federal research funding uncertainty has already reduced graduate admissions by about 15% at the nation’s premier research institutions. Because graduate education in the atmospheric, hydrologic, oceanographic, and climate sciences is heavily supported by federal research grants and cooperative agreements, these disciplines are expected to experience comparable reductions in graduate student recruitment and training unless funding stability is restored.

> **5. Reduced opportunities for scientific advancement as scientists would be more limited in how they report their research findings in scientific journals** (§ 200.461) **and less able to attend meetings where discussions of recent events, research advances, and potential new projects occur.** (§ 200.432, § 200.454)

Science is advanced through the free and open exchange of discoveries, data, and ideas. Research on weather, water, and climate in particular depends on sharing a wide range of data, collected in locations all across the globe by a multitude of scientists and institutions, in order to build an ever more complete understanding of Earth systems and how they interact. Publication of research results in scientific journals and attendance at

scientific conferences are foundational tools for sharing scientific information, building collaborations, and developing the workforce. The proposed changes to § 200.461 would limit publication costs, “including author page charges, article processing charges, or similar fees such as the cost of open access fees for professional journal publications and other peer-review publications” unless “specifically required by Federal statute or approved in advance by the Federal agency on a case-by-case basis.” We are concerned that this would limit scientists' options for communicating research advances and breakthroughs, thereby making it harder for others in the scientific community to build on their advances. Publication of research results in scientific journals increases the return on federal investments by ensuring that weather, water, and climate research insights are available and documented as part of the permanent scientific record.

The proposed changes to § 200.432 would only allow federal funds to be used to cover the costs to attend conferences “if participation in the conference is expressly approved by the agency and included in the terms and conditions of the award. The revision would clarify that recipients are not authorized to attend conferences using federal funds that do not serve to advance program outcomes.” We are concerned that the proposed change would reduce the potential for scientists to meet, develop, or enhance collaborations with other scientists and operational weather forecasters, thereby slowing innovation. This proposed rule would create additional burdens for scientists to attend conferences to share results of federally funded research. For example, if their research yields unexpected outcomes, it could be very valuable to attend different conferences than originally anticipated. Furthermore, the requirement for pre-approval to attend conferences would likely hinder responsiveness to weather-related disasters (e.g., Guadalupe River flash flood, specific hurricanes). For example, the American Meteorological Society often convenes sessions on high-impact weather events at conferences and meetings held in their immediate aftermath to advance understanding and share lessons learned. Scientists would not likely have included attending such a conference in grants awarded long before these events occurred.

The proposed changes to § 200.454 would make “the costs of subscriptions or memberships in country clubs or organizations whose primary purpose is lobbying or issue advocacy” unallowable. We are concerned that the proposed rule creates uncertainty about whether membership dues for professional societies, such as the American Meteorological Society, would be allowable because it is unclear how it would be determined if the primary purpose of an organization is issue advocacy. For students and early-career professionals, professional societies provide a crucial support system for their professional development. These organizations provide those entering the workforce the opportunity to share research results through publishing in highly credible

scientific journals and engage in professional networking at scientific conferences. Furthermore, becoming a member provides access to additional educational and career development resources, such as job boards and mentorship programs.