



Office of Management and Budget (OMB) Proposal Comment Guide Speak out by July 13, 2026

The federal government should fund research, education, and community programs based on evidence, need, and public benefit, not political approval.

A [new proposal](#) from the Office of Management and Budget (OMB), joined by more than 40 federal agencies, would rewrite the rules for how federal grants, loans, and cooperative agreements are awarded and managed. This is not a routine update: it's one of the most consequential changes to the federal grantmaking system in decades, affecting universities, nonprofits, researchers, state agencies, and community organizations nationwide.

If finalized, political appointees, not scientists or peer reviewers, would gain new power to approve, reject, or end grants based on an administration's priorities. That puts lawful work at risk simply because it addresses pay equity, women in STEM, civil rights, gender identity, campus safety, or student support.

The U.S. Supreme Court has been clear: the government cannot use funding conditions to force ideological compliance. This rule would do exactly that.

Comments opposing this rule are due by July 13, 2026, at 11:59 pm ET.

[Click here to submit your comment now.](#)

What's At Stake

- **Political appointees, not scientists or peer reviewers, would decide which grants survive.** Peer review would become advisory only. Strong proposals on women's health, pay equity, campus safety, or women in STEM could be rejected for political reasons instead of merit.
- **Vague rules could punish lawful partnerships.** Undefined eligibility terms would let agencies deny funding based on whom an organization works with, like civil rights groups, immigrant-serving organizations, or international academic bodies, even without any wrongdoing.
- **Grants could be canceled mid-stream if priorities shift.** Awards can be terminated at any time if they no longer match the administration's current priorities, with no appeal, no detailed explanation required, and no protection from a change in leadership.
- **Equity programs could shut down out of fear, not fault.** Programs that mentor women of color in research careers, support underrepresented STEM students, address pay gaps, or help campuses comply with Title IX could be narrowed or cut simply because institutions fear losing federal funds.
- **The data needed to document inequality could be restricted.** The proposal would limit funding for research using disparate-impact analysis, the standard tool for documenting bias in pay, hiring, lending, education, and health.
- **Women researchers could lose ground.** New approval requirements for conferences and blanket bans on journal subscriptions and publication costs would make it harder for researchers, especially women, women of color, and early-career scholars, to share findings, build networks, and advance in fields where they're still underrepresented.



What You Can Do

If this proposal is finalized and enacted, it would constitute a form of regulation that could only be changed through another formal rulemaking process, which can take many months or years. It is imperative to raise concerns about these proposed changes.

1. **Submit a personalized comment by July 13, 2026** (Docket ID: OMB-2026-0034). The agency is more likely to fully consider individualized comments. There are numerous proposed changes by OMB, so do not feel like you need to address every single issue.
 - a. If you work/have worked at a nonprofit or school, share how these new restrictions would affect your job and the people you serve.
 - b. If you're a researcher, explain how this proposed rule would impact your ability to complete an ongoing project or pursue a new opportunity in your field.
 - c. If you're a community member, talk about how local nonprofits have helped you and your family or how they've benefitted those around you — and the consequences if those services go away.
2. **Spread the word.** Share this guide with colleagues, community partners, and local nonprofits.
3. **Affirm our values.** AAUW has spent more than 140 years building an evidence base on the barriers women face in education and the workforce. The programs most threatened by this proposed rule are not programs that violate the law. They are programs that respond to documented, federally recognized inequities.

See additional background on the proposed rule.

AAUW does not receive federal funding and is not subject to this rule. But when the federal funding environment punishes equity-focused work, the ripple effects hit our grantees, our fellows, and the communities our members serve. That's why we're encouraging every AAUW member and advocate to make their voice heard.

[Click here to submit your comment through AAUW's action page.](#) We provide a sample comment letter that you can easily personalize. Please note this is a public comment that will be published with your name. To submit a comment anonymously, [visit regulations.gov](#).

Stand with AAUW. Speak out. Submit your comment by July 13, 2026.

Have questions or need help? Reach out to advocacy@aauw.org.



Background on the Proposed Rule

Key Provisions

Political Appointee Pre-Approval of Every Grant

- **What it does:** Senior political appointees, not scientific experts or peer reviewers, must sign off on every discretionary award. Grants must "demonstrably advance the President's policy priorities." Peer review is explicitly advisory only.
- **Why it matters:** Transforms the grant process from a merit-based system into a political loyalty test. Proposals can be rejected for promoting "anti-American values," a term with no legal definition. Organizations working on equity, gender, public health, and climate research are directly at risk.

DEI and "Gender Ideology" Prohibitions

- **What it does:** Agencies must ensure awards are not used to "fund, promote, encourage, subsidize, or facilitate" DEI practices, "gender ideology," or the "transition" of anyone under 19. The rule relies on the DOJ's July 2025 memo, nonbinding guidance courts have already found unconstitutionally vague.
- **Why it matters:** The same "illegal DEI" standard courts struck down in *AFT v. U.S. Department of Education* is now codified as binding regulation. Organizations cannot reliably determine compliance, and the penalty for guessing wrong is grant termination or loss of federal funding. The chilling effect is the point.

Disparate-Impact Research Ban

- **What it does:** Federal awards may not fund research that uses disparate-impact methodology, the standard tool for measuring how neutral policies affect different groups, if the administration characterizes it as contrary to civil rights law. The administration has already taken this position: a 2025 executive order declares disparate-impact liability unconstitutional and sets a policy of eliminating its use across the federal government.
- **Why it matters:** Disparate-impact analysis is the evidentiary foundation for documenting the gender pay gap, racial wealth disparities, and discriminatory lending and hiring patterns. Defunding this research eliminates the data needed to identify and address inequality. You can't fix what you can't measure.

Termination at Will, Without Explanation

- **What it does:** Agencies may terminate active grants at any time if the award no longer "effectuates Federal agency priorities . . . as they exist at the time of the termination." Terminations may apply to entire classes of awards. No appeal rights. No detailed explanation required.
- **Why it matters:** A change in political leadership is explicitly named as grounds for termination. Multi-year grants, clinical trials, and ongoing research programs have no protection against midstream cancellation due to changes in administrative priorities.



Affiliation-Based Eligibility Screening

- **What it does:** Agencies may screen out applicants based on affiliations with organizations that "violate Federal law, undermine public safety or national security, or advocate for the overthrow" of the government. None of these categories are defined.
- **Why it matters:** Guilt by association, not conduct. Organizations that partner with civil rights groups, immigration legal services, or international academic bodies could be disqualified without any specific wrongdoing identified. [AFT warns](#) this could eliminate "thousands of jobs and educational programs."

Conference, Subscription, and Publication Costs Eliminated

- **What it does:** Conference attendance requires advance agency approval. Journal subscriptions are categorically unallowable. Publication costs, including open-access fees, are disallowed unless expressly approved.
- **Why it matters:** Federal funding sustains peer-reviewed science. Blocking publication and conference costs limit the dissemination of federally funded findings, restrict professional development, and isolate U.S. researchers from global scientific communities.

Impact on Women & Equity

Race, Equity Research, and Disparate-Impact Analysis

The DEI prohibitions and the ban on disparate-impact research methodology would chill a wide range of lawful, evidence-based programs and eliminate the tools used to document them. Courts, including the court that vacated the DOE certification, have been explicit: race-neutral efforts to expand access and address documented gaps are not presumptively unlawful under Title VI.

Programs at risk include mentoring initiatives for women of color in research careers, scholarship programs at HBCUs and Hispanic-Serving Institutions, outreach to underrepresented STEM students, and professional development designed to address documented pay and advancement gaps. The data behind these programs is concrete:

- Black and Hispanic women with bachelor's degrees earn 37 and 34 percent less, respectively, than white men with the same credential.
- Women represent just 26 percent of the U.S. STEM workforce — a figure that has barely moved in more than two decades.
- Women hold the majority of the country's \$1.9 trillion in outstanding student loan debt.

The ban on disparate-impact research would strip away the methodology used to document these gaps.

Gender, Title IX, and "Gender Ideology" Prohibition

The rule's "gender ideology" prohibition and the explicit ban on funding anything related to gender transition for anyone under 19 would reach far beyond medical care. Research on gender identity and health outcomes, campus programming, counseling services, and Title IX compliance work could all be swept in, particularly under the political appointee pre-approval requirement, where officials with broad, undefined discretion can reject proposals they deem inconsistent with administration priorities.



AAUW's long-standing Title IX education and advocacy work directly intersects with the topics this rule targets. The vagueness is not incidental. As [AFT notes](#), "there are few or no rules or standards as to what the appointees can reject." That ambiguity produces the same result as an explicit prohibition: programs disappear to avoid the risk.

Free Expression and Viewpoint Discrimination

The Supreme Court has been clear: the government cannot use funding conditions to compel grantees to adopt its preferred viewpoint or penalize those whose views it disfavors. This rule does exactly that, at every stage of the grant lifecycle. The political pre-approval process, the "anti-American values" disqualification, and the undefined DEI and gender ideology prohibitions together constitute a viewpoint test for federal funding. An organization whose work addresses systemic barriers, pay equity, or gender health can be defunded not because it violated a law, but because a political appointee decided its work reflects the wrong values.