

National Academies of Practice (NAP) Public Comment
Office of Management and Budget (OMB) Proposed Rule (Docket ID OMB-2026-0034)

The National Academies of Practice (NAP) respectfully submits these comments regarding the Office of Management and Budget Proposed Rule OMB-2026-0034.

Introduction

Founded in 1981, the National Academies of Practice (NAP) is a nonprofit organization that advises governmental bodies on policies and practices that strengthen the U.S. healthcare system. As the nation's only interprofessional alliance of its kind, NAP brings together expert practitioners and scholars across 17 health professions including athletic training, audiology, nursing, nutrition and dietetics, occupational therapy, optometry, oral health, pharmacy, physical therapy, physicians, podiatric medicine, psychology, public health, respiratory care, social work, speech-language pathology, and veterinary medicine to support collaboration, excellence in practice, and policies that promote high-quality, person-centered care.

NAP's mission to advance interprofessional education, scholarship, research, practice, and public policy is grounded in four organizational values: **collaboration, patient-centeredness, inclusivity, and interconnectedness**. These values recognize that effective healthcare depends upon rigorous evidence, interdisciplinary expertise, and the ability of healthcare professionals to work together across disciplines in service of patients, families, communities, and populations.

NAP affirms that the generation, integration, dissemination, and application of evidence are foundational to achieving optimal outcomes in interprofessional healthcare. NAP defines **evidence-based practice** as “the integration of professional/clinical expertise, patient/client values, and the best research evidence into the decision-making process for patient/client-centered care” based upon “professionally and/or clinically relevant research that has been conducted using sound methodology” (NAP Lexicon 3.0 Taskforce, 2024, p. 9). Evidence-based interprofessional practice ensures that patients, families, communities, and populations benefit from coordinated, informed, and respectful care that draws upon the best available evidence and the diverse expertise of healthcare teams.

Organizational Interest

NAP has a direct organizational interest in this proposed rule because the federal research enterprise serves as the foundation for evidence-informed healthcare, interprofessional education, quality improvement, and health policy. Federal investments in biomedical, clinical, health services, public health, behavioral, and implementation science generate the evidence that healthcare professionals rely upon to deliver safe, effective, equitable, and person-centered care. The proposed changes to the administration of federally funded research therefore have implications that extend across all 17 health professions represented within NAP.

As an organization committed to advancing evidence-based interprofessional practice, NAP is particularly concerned with policies that may affect the integrity, independence, transparency, dissemination, and sustainability of scientific research. Healthcare professionals across disciplines depend upon objective, high-quality evidence to inform clinical decision-making,

develop practice guidelines, educate future practitioners, evaluate healthcare quality, and improve population health. Maintaining a stable, transparent, and scientifically rigorous federal research enterprise is therefore essential to NAP's mission and to the patients, families, communities, and populations served by its members.

Accordingly, NAP submits these comments to encourage policies that preserve scientific integrity, support evidence-informed decision-making, strengthen interprofessional collaboration, and sustain public trust in the nation's research enterprise while ensuring accountability, transparency, and responsible stewardship of public resources.

Position

NAP respectfully urges the Office of Management and Budget (OMB) to withdraw the proposed rule to preserve the integrity, independence, transparency, dissemination, and sustainability of the federal research enterprise. Policies affecting federally funded research should reinforce -- not weaken -- the scientific processes that support evidence-based healthcare, interprofessional collaboration, and public trust.

Federal investments in research have enabled improvements in disease prevention, diagnosis, treatment, patient safety, healthcare delivery, and population health. Maintaining a research environment guided by scientific merit and rigorous peer review is essential to ensuring that healthcare decisions continue to reflect the best available evidence.

In addition to generating new knowledge, federally supported research advances implementation science, enabling healthcare organizations and interprofessional teams to translate research findings into routine clinical practice. Sustained investment in implementation science is essential for ensuring that research discoveries ultimately improve patient outcomes.

Background

The Office of Management and Budget (OMB) proposed rule would make significant changes to the administration of federally funded research. As drafted, the proposed rule would expand executive review of federally funded research, increase the potential for modification or termination of awards based on evolving executive priorities, limit certain categories of research, restrict dissemination activities, and create uncertainty throughout the federal research enterprise. NAP is concerned that these changes would undermine scientific independence, weaken the stability of research programs, and diminish the evidence infrastructure relied upon by clinicians, health systems, educators, policymakers, and patients.

Federally funded health research is traditionally awarded through rigorous scientific peer review, which evaluates proposals based on scientific merit, methodological rigor, feasibility, and potential public benefit. This process provides the foundation for the nation's biomedical, clinical, health services, and public health research enterprise.

The proposed changes extend well beyond administrative efficiency. They have the potential to affect how research priorities are established, how grants are evaluated, how interdisciplinary

collaborations develop, and how scientific findings are disseminated to healthcare professionals and the public. These functions collectively support the evidence base that informs clinical practice, healthcare policy, quality improvement, and public health across every profession represented within NAP.

Analysis

- **Expanded Political Review of Federally Funded Research**

The proposed rule would expand the authority of political appointees to review and potentially block or terminate federally funded research based on evolving executive priorities. NAP is concerned that introducing political considerations into scientific funding decisions would weaken the longstanding peer-review process that ensures research is evaluated according to scientific merit, methodological rigor, and public benefit.

- **Restrictions on Health Services Research**

The proposed rule would prohibit or limit certain categories of health services research. Such restrictions would reduce the nation's ability to investigate complex healthcare challenges, evaluate interventions, improve healthcare delivery, address health disparities, and generate evidence needed to improve outcomes for patients, families, communities, and populations. Limiting scientific inquiry in these areas diminishes the evidence available to inform clinical practice, healthcare policy, and public health.

- **Reduced Support for Research Infrastructure and Workforce Development**

The proposed rule reduces support for the professional infrastructure that sustains the nation's research enterprise, including research training, career development, scientific collaboration, and institutional capacity. Federal investment in developing the next generation of researchers is essential to maintaining a robust scientific workforce capable of addressing future healthcare challenges and advancing evidence-informed practice across disciplines.

- **Restrictions on Dissemination of Publicly Funded Research**

The proposed rule would restrict activities that facilitate the dissemination and translation of federally funded research. Scientific publications, professional conferences, stakeholder engagement, implementation science, and knowledge translation are essential for ensuring that research findings reach clinicians, educators, policymakers, healthcare organizations, and the communities they serve. Limiting these activities would reduce the impact of federal research investments and impede the translation of scientific discoveries into improvements in healthcare delivery and population health. Dissemination of research findings through scientific publications, professional meetings, stakeholder engagement, and implementation activities is an integral component of the federal research enterprise because scientific discoveries improve health only when evidence is communicated, evaluated, and translated into policy and practice.

Recommendations

To preserve the integrity of the nation's scientific enterprise while ensuring responsible stewardship of public resources, the National Academies of Practice respectfully recommends that the Office of Management and Budget:

1. **Preserve independent scientific peer review** as the primary mechanism for evaluating the scientific merit, quality, and funding of federally supported research, ensuring that funding decisions are grounded in methodological rigor, scientific excellence, and potential public benefit.
2. **Maintain robust protections for scientific independence** while ensuring transparent accountability and responsible stewardship of public resources. Federal policies should support objective, evidence-informed decision-making that fosters public trust in the research enterprise.
3. **Ensure that any modification, suspension, or termination of federally funded research awards** is based on clear, objective, transparent, and consistently applied criteria that preserve scientific integrity, provide appropriate due process, and minimize unnecessary disruption to ongoing research.
4. **Sustain long-term federal investment in research infrastructure and workforce development**, including research training, career development, implementation science, interdisciplinary collaboration, and institutional capacity, to ensure the continued generation and translation of high-quality scientific evidence.
5. **Protect activities that facilitate the dissemination and translation of federally funded research**, including peer-reviewed publications, scientific conferences, professional education, stakeholder engagement, implementation science, and knowledge translation, so that research findings effectively reach healthcare professionals, policymakers, patients, families, communities, and the public.
6. **Recognize and support interdisciplinary and interprofessional research** as essential to addressing today's complex healthcare challenges. Federal policies should encourage collaboration across health professions, academic institutions, healthcare systems, public health agencies, community organizations, and other sectors to advance evidence-informed care and improve health outcomes.
7. **Engage researchers, interprofessional healthcare organizations, healthcare professionals, patients, community representatives, academic institutions, scientific societies, and other stakeholders** through transparent consultation in the development and implementation of policies affecting the federal research enterprise.
8. **Build upon existing federal oversight mechanisms** to strengthen accountability, transparency, and fiscal stewardship while avoiding unnecessary administrative burdens or duplicative requirements that may increase uncertainty, discourage innovation, or reduce the efficiency of federally supported research.

Conclusion

The National Academies of Practice recognizes and supports the federal government's responsibility to ensure accountability, transparency, and responsible stewardship of public resources. NAP also supports thoughtful efforts to reduce unnecessary administrative burden and

improve the efficiency of federally funded research. These goals are compatible with—and should reinforce—the principles of scientific integrity, rigorous peer review, and evidence-informed decision-making.

As the nation's only interprofessional organization representing distinguished practitioners and scholars from 17 health professions, NAP believes that strong scientific evidence is essential to advancing high-quality, person-centered healthcare and improving the health and well-being of individuals, families, communities, and populations. Protecting the independence, stability, and transparency of the federal research enterprise ensures that healthcare professionals, educators, researchers, and policymakers can continue to rely on trustworthy evidence to inform practice and policy.

NAP respectfully encourages OMB to revise the proposed rule in ways that preserve scientific excellence while achieving the Administration's goals of accountability and administrative efficiency. We believe these objectives are complementary rather than competing.

NAP welcomes the opportunity to serve as a resource to the Office of Management and Budget and other federal agencies as they consider policies affecting the nation's research enterprise. Our interprofessional membership offers broad expertise in healthcare delivery, research, education, implementation science, and public policy, and we stand ready to collaborate in developing solutions that strengthen accountability, reduce unnecessary bureaucratic burden, and sustain a robust, evidence-based healthcare system for the benefit of all Americans.

Respectfully submitted,

Anthony Breitbach, PhD, ATC, FASAHP, FNAP
National Academies of Practice
President 2025-2027

July 13, 2026