

July 13, 2026

By Electronic Submission

The Office of Management and Budget (OMB)
725 17th Street NW
Washington, DC 20503

Re: Proposed Rule: Regulation for Federal Financial Assistance. Docket No. OMB-2026-0034.

The Council for Responsible Nutrition (CRN) appreciates the opportunity to comment on the Office of Management and Budget's (OMB) proposed "Uniform Grants Regulation" framework for managing and administering Federal financial assistance. Founded in 1973 and based in Washington, D.C., CRN is the leading trade association representing the dietary supplement and functional food industry, with members that include manufacturers, ingredient suppliers, and service providers committed to advancing science, transparency, and responsible business practices. CRN and its members have a strong interest in federal research policies because nutrition science supported through federal grants informs the evidence base underlying dietary ingredients, public health recommendations, innovation, and consumer confidence. CRN supports OMB's objectives of improving transparency, accountability, and stewardship of federal research funding while ensuring that grant programs effectively advance their statutory purposes.

CRN's comments focus on ensuring that the proposed revisions preserve a strong, merit-based framework for scientific research and continue to foster innovative, evidence-based nutrition science that benefits public health.¹

I. Federal Research Funding Should Continue to Prioritize Scientific Merit

Federal investments in scientific research yield the greatest public benefit when funding decisions are grounded in objective measures of scientific merit. Consistent, merit-based evaluation promotes public confidence in the integrity of the federal research enterprise while helping ensure that taxpayer resources support projects most likely to generate

¹ CRN takes no position on provisions not discussed herein, and the absence of comment should not be construed as agreement with, acceptance of, or endorsement of those provisions.

meaningful advances in scientific knowledge and improve public health. Conversely, when the decision-making for federal research investments is ambiguous or unpredictable, particularly when those decisions involve political discretion, uncertain enforcement standards, or shifting interpretations of what is important, researchers are left guessing about their obligations or the certainty of long-term research funding.

CRN encourages OMB to affirm that scientific merit is the preeminent criterion and should be evaluated using well-established principles, including:

- scientific significance and potential impact;
- methodological rigor and appropriate study design;
- qualifications and expertise of the investigative team;
- feasibility of the proposed research;
- transparency and reproducibility of research methods; and
- the potential to generate reliable evidence that informs public policy, healthcare, and future scientific inquiry.

Maintaining an objective, evidence-based review process is essential to ensuring that federal research funding supports the highest quality science across all disciplines. Scientific proposals should be evaluated based on the strength of the proposed research rather than the subject matter, scientific discipline, or type of intervention being studied.

CRN also believes that the principles of "Gold Standard Science" are best advanced through transparent, rigorous, and reproducible evaluation of research proposals, supported by independent peer review and objective assessment of scientific quality. These principles have long served as the foundation of federally supported research and should continue to guide funding decisions under the proposed Uniform Grants Regulation. Decision-making for federal research investment should:

- Clearly identify the policy objectives the government seeks to advance;
- Establish well-defined criteria for implementation and enforcement;
- Provide transparent processes for decision-making that is separate and independent from political considerations;
- Avoid vague standards that could be applied inconsistently;
- Include meaningful opportunities for stakeholder engagement; and

- Ensure that compliance expectations are practical, proportionate, and administrable.

By reinforcing scientific merit as the central criterion for federal research funding, OMB can strengthen the integrity, credibility, and public value of federally funded research while ensuring that grant programs continue to fulfill their statutory missions.

II. Federal Research Funding Should Continue to Support Innovative, Evidence-Based Nutrition Research

CRN encourages OMB to recognize that continued investment in innovative nutrition research is essential to fulfilling many federal public health objectives.

Nutrition science continues to evolve rapidly through advances in precision nutrition, biomarker development, personalized nutrition, microbiome science, and other emerging fields. These innovations hold significant promise for improving health outcomes, reducing healthcare costs, and preventing chronic disease.

Federal financial assistance should continue to support innovative, evidence-based approaches to improving nutrition and public health when supported by sound scientific methodology. Such research is particularly important because nutrition interventions often represent accessible, cost-effective approaches that complement other public health strategies.

CRN also encourages OMB to recognize that nutrition science relies on a range of complementary scientific methodologies. Depending upon the research question, high-quality evidence may derive from randomized controlled trials, prospective cohort studies, mechanistic research, observational data, systematic reviews, meta-analyses, biomarker studies, and appropriately designed real-world evidence. Funding decisions should continue to evaluate the totality of scientific evidence and support research methods that are feasible, ethical and appropriate to the specific scientific question under investigation.

III. Program Planning Should Recognize Nutrition Research as Central to Federal Public Health Missions

The proposed revisions to § 200.202 (Program Planning and Design) emphasize that federal financial assistance programs should be designed to advance the public purposes authorized by law. CRN encourages OMB to recognize that nutrition research—including research on dietary supplements—is an important component of many federal agencies' statutory public health missions. While the interest in, and implications of, nutrition

science stretch across multiple departments and agencies, the centrality of the answers it provides is constant.

Federal agencies such as the National Institutes of Health (NIH), the U.S. Department of Agriculture (USDA), the Centers for Disease Control and Prevention (CDC), and the Food and Drug Administration (FDA) all have statutory responsibilities that include advancing nutrition science, improving nutritional status, reducing chronic disease risk, and generating evidence that informs public health recommendations. High-quality research on dietary supplements and other nutrition interventions directly contributes to these objectives by expanding the evidence base on nutrient intake, safety, efficacy, and health outcomes.

Evidence-based nutrition and dietary supplement research are fully consistent with the statutory purposes of many federal research and public health programs. Program planning should continue to encourage scientifically rigorous investigations that address important nutrition-related public health questions and support innovation in areas such as healthy aging, maternal and infant nutrition, immune health, metabolic health, cognitive function, precision nutrition, and the prevention of nutrient inadequacies.

Recognizing nutrition science as an integral component of federal public health research will help ensure that agencies maintain balanced research portfolios capable of addressing the nation's evolving health challenges through a broad range of evidence-based interventions.

IV. Implementation of Merit-Based Policies Should Preserve Scientifically Necessary Population Research

CRN supports OMB's objective of ensuring that federal research funding is awarded based on scientific merit and advances authorized public purposes. As OMB finalizes these revisions, however, we encourage the agency to clarify that implementation of these policies should not discourage or inadvertently limit research that appropriately examines biological or population differences when such research is necessary to answer important scientific and public health questions.

Nutrition science increasingly recognizes that individuals and populations do not respond identically to dietary and nutritional interventions. Biological sex, life stage, genetic variation, ancestry, race, ethnicity, underlying health status, environmental exposures, and other scientifically relevant characteristics may influence nutrient metabolism, nutritional requirements, efficacy, and safety. Understanding these differences is essential to

developing evidence-based nutrition recommendations that improve health outcomes for all Americans.

For example, research focused on women's health has become an important national priority. The Department of Health and Human Services (HHS) has recently elevated women's health research through new initiatives, including its inaugural National Conference on Women's Health, recognizing longstanding gaps in scientific knowledge regarding women's health across the lifespan. Continued progress in this area depends on the ability of investigators to design studies that specifically examine nutrition, dietary supplements, and other interventions in women throughout their lifespan.

Similarly, advances in precision nutrition increasingly rely on understanding how different populations respond to nutritional interventions. Scientifically rigorous studies may appropriately examine differences in response among population groups to identify factors that influence nutrient requirements, efficacy, safety, or disease risk. Such research ultimately supports the development of more precise, evidence-based public health recommendations and contributes to improving health outcomes across diverse populations.

CRN encourages OMB to clarify that merit-based review should focus on whether the inclusion of population characteristics is scientifically justified by the research question and study design. When investigators propose to examine biological or demographic differences because doing so is necessary to generate valid, reproducible, and clinically meaningful evidence, those considerations should be recognized as strengthening—not detracting from—the scientific merit of a proposal.

Clarifying this principle would reinforce OMB's stated commitment to scientific excellence while ensuring that federal research programs continue to support high-quality investigations addressing important questions related to public health. Such an approach is fully consistent with a merit-based research enterprise that evaluates proposals according to scientific rigor, methodological appropriateness, and the potential to generate meaningful evidence for improving health.

V. Conclusion

CRN appreciates OMB's commitment to improving transparency, accountability, and stewardship in federal financial assistance programs. We encourage OMB to ensure that implementation of the proposed revisions continues to foster a merit-based scientific enterprise that supports innovative, evidence-based nutrition research.

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Federal investments in nutrition and dietary supplement science have contributed substantially to our understanding of health promotion, disease prevention, and the role of nutrition in improving health across the lifespan. Maintaining a grantmaking framework that rewards scientific excellence, recognizes nutrition research as a core component of federal public health missions, supports innovative research, and balances accountability with administrative efficiency will help ensure that taxpayer resources continue to generate high-quality scientific evidence that improves nutrition, advances public health, and delivers meaningful benefits to the American people.

Thank you for your consideration.

Sincerely,

A handwritten signature in blue ink, appearing to read "Andrea Wong".

Andrea Wong
Senior Vice President and Chief Science
Officer

A handwritten signature in blue ink, appearing to read "Steve Mister".

Steve Mister
President & CEO