

Comments of the Society for American Archaeology, the Archaeological Institute of America, and the Archaeology Division of the American Anthropological Association on the Proposed Rule by the Office of Management and Budget Concerning Regulation for Federal Financial Assistance

July 13, 2026

Mr. Andrew Reisig
Office of Management and Budget
725 17th Street, NW
Washington, DC 20503

RIN: 1090-AB34
OMB-2026-0034-0001

Dear Mr. Reisig,

The Society for American Archaeology, the Archaeological Institute of America, and the American Anthropological Association's Archaeology Division write to strongly object to the proposed rule titled "**Regulation for Federal Financial Assistance**" published May 29, 2026 in the Federal Register. If enacted this rule will result in political control of the issuance of federal grants, cooperative agreements and other forms of assistance. While the SAA and its members strongly support the transparency and accountability of lawful grant-making by federal agencies called for in the proposed rule, if implemented we believe that the end result will be the opposite of what the authors of the document claim in their justifications for writing the draft.

The SAA is an international organization that, since its founding in 1934, has been dedicated to research about and interpretation and protection of the archaeological heritage of the Americas. With more than 6,000 members, the SAA represents professional and avocational archaeologists, archaeology students in colleges and universities, and archaeologists working at tribal agencies, museums, government agencies, and the private sector. The SAA has members throughout the United States, as well as in many nations around the world.

The Archaeological Institute of America (AIA) is a private, non-profit charitable corporation founded in 1879 and chartered by an act of Congress in 1906.^[1] The AIA is the oldest and largest organization in the United States that is devoted to the world of archaeology. It has over one hundred local societies located throughout the United States and a membership of approximately 150,000 professional archaeologists, corresponding members, students, and lay enthusiasts united by a shared passion for the past, for archaeology and for its role in furthering human knowledge.

The Archaeology Division (AD) of the American Anthropological Association (AAA) was founded in 1983 to advance the study of archaeology as an aspect of anthropology, to enable

dialogues and debates about ideas in archaeology, and to encourage the publication and communication of archaeological knowledge to anthropologists and to the public. The AAA, founded in 1902, is the world's largest organization of anthropologists, with thousands of members throughout the US and around the world. The AAA is dedicated to advancing human understanding and applying this knowledge to the world's most pressing problems.

Specific Comments:

Of greatest concern are the portions of the proposed rule that seek to place a measure of decision-making authority on federal grants under political appointees. The provisions that most directly give political appointees authority over grant approvals are concentrated in proposed revisions to 2 CFR § 200.205 (Federal agency merit review of proposals).

*§ 200.205(b) – Pre-Issuance Review – this language requires agency heads to “designate one or more senior appointees” to conduct a pre-issuance review of “all discretionary awards.” The provision makes Presidential appointees (requiring Senate confirmation or not) and noncareer members of the Senior Executive Service part of every discretionary grant approval process, directly undermining the primacy of the peer-review process in determining the scientific value of proposed research.

*§ 200.205(b)(1) – states that discretionary awards must, where applicable, “demonstrably advance the President's policy priorities.” This places an explicit political litmus test of presidential policy alignment for grant approval, placing scientific concerns behind political ones.

*§ 200.205(c) – Procedure for Pre-issuance Review – states that senior appointees “must not ministerially ratify or routinely defer to the recommendations of others but must instead use their independent judgment.” The effect will be to close out the input of independent, objective peer review assessment of grant proposals and place de facto final decision-making authority with political appointees. There is nothing in the proposed rule to prevent such decision-making from being arbitrary and capricious.

*§ 200.205(d) – Use of Peer Review – states that peer-review recommendations “remain advisory” and may not be treated as binding by senior appointees. This section further reduces peer review of grant proposals from the primary decision mechanism to what is at best an advisory role, even though there are several federal statutes that at least require federal agencies to take the best available data into account when making determinations. One such example is the **Information Quality Act of 2000**, which required OMB to issue government-wide guidelines directing federal agencies to ensure the quality, objectivity, utility, and integrity of information they disseminate.

None of these proposed changes to § 200.205 are acceptable and should be withdrawn. Further, the proposed rule should be amended to make it clear that it only applies to discretionary awards and does not pertain to Congressionally Directed Spending. Any grants authorized and

appropriated by Congress must be issued in a timely and transparent fashion.

General Comments:

Archaeological research in the United States—and the research of American archaeologists working overseas—depends heavily on competitive federal grants from agencies such as the National Science Foundation, National Park Service, National Endowment for the Humanities, Bureau of Land Management, U.S. Forest Service, and other federal entities. These grants support research that advances scientific knowledge, preserves irreplaceable cultural heritage, trains future researchers, and informs federal land management and historic preservation decisions. Similar reliance on federal assistance exists across numerous scientific disciplines, including environmental science, ecology, geology, anthropology, and climate research.

The proposed revisions appear likely to increase administrative complexity and compliance burdens for both applicants and recipients. Universities, museums, Tribal organizations, nonprofit research institutions, and state agencies already devote substantial resources to complying with federal grant requirements. Additional administrative obligations, increased documentation requirements, or greater uncertainty regarding compliance standards would divert limited personnel and financial resources away from research activities and toward administrative functions.

These burdens would disproportionately affect smaller institutions, including Tribal Historic Preservation Offices, local governments, museums, and nonprofit organizations that often operate with limited administrative staff. Many archaeological projects are conducted by institutions that lack dedicated grants management offices and instead rely upon principal investigators to fulfill both scientific and administrative responsibilities. Increasing compliance costs without corresponding increases in funding will inevitably reduce the amount of research that can be conducted.

In that vein, archaeological research is particularly vulnerable to delays because many projects are seasonal and depend on narrow fieldwork windows, permitting schedules, weather conditions, and coordination with federal land managers and Tribal governments. Additional administrative requirements or uncertainty surrounding grant implementation could delay project initiation, resulting in missed field seasons that cannot simply be rescheduled. Such delays increase project costs, reduce research productivity, and can jeopardize long-term collaborative relationships with local communities and Tribal partners.

The proposed revisions also risk discouraging researchers from seeking federal funding altogether. Federal grants are already highly competitive, requiring substantial investments of time and institutional resources to prepare applications and administer awards. This would diminish the return on federal investments in science and cultural heritage.

The consequences would extend well beyond individual research projects. Archaeological investigations supported by federal grants generate public benefits that include preservation of cultural resources, improved understanding of Indigenous and American history, educational opportunities for students, public outreach, stewardship of museum collections, and collection of data that support industry's compliance with federal historic preservation laws. These projects also contribute to local economies through employment, travel, field operations, laboratory analysis, and partnerships with community organizations. Reducing the effectiveness of federal grant programs would therefore have ripple effects well beyond the research community.

Impact Upon Future Archaeologists:

The proposed rule may also reduce opportunities for early-career researchers and students. Graduate students, postdoctoral researchers, and undergraduate trainees frequently receive their first research experience through federally funded projects. Administrative burdens that reduce the number or scope of funded projects will directly affect workforce development in archaeology and related scientific fields. At a time when many disciplines face shortages of trained professionals, policies that make research funding more difficult to administer risk weakening the nation's future scientific capacity. The NSF's recent cancellation of its Doctoral Dissertation Research Improvement (DDRI) grants in archaeology is but one example of how implementation of the proposed rule could decimate not only research but the ability of archaeologists to complete their academic careers.

Impact on International Archaeological Research:

Federal archaeological research grants also extend to projects carried out abroad. Given America's long and extensive history of involvement in every corner of the globe, the international archaeological record is just as valuable in understanding the US as the domestic record. US archaeologists working abroad under federal grants not only preserve, protect and interpret foreign and US archaeological materials overseas, but also build valuable cultural connections, spread scientific knowledge and create goodwill between the US and other nations. This cannot happen if such research funding is blocked by political concerns.

Conclusions:

Scientific research depends on stability and predictability. Frequent or substantial changes to government-wide grant requirements require institutions to revise policies, retrain personnel, update financial systems, and modify internal controls. These transition costs are significant and are rarely reimbursed through research grants. Before implementing broad changes to federal financial assistance policies, OMB should carefully evaluate whether the anticipated administrative benefits outweigh the substantial costs imposed on research institutions and grant recipients.

If OMB determines that revisions to the Uniform Guidance are necessary, the agency should adopt an approach that minimizes disruption to scientific research. At a minimum, OMB should

provide clear implementation guidance, allow sufficient transition periods, preserve flexibility for research grants where appropriate, and carefully consider the cumulative administrative burden placed on recipients. OMB should also engage extensively with universities, museums, scientific societies, Tribal organizations, and nonprofit research institutions to better understand how proposed changes would affect federally supported research.

The United States has long benefited from a federal research enterprise that supports innovation, scientific discovery, cultural preservation, and evidence-based policymaking. Archaeological research is a critical component of that enterprise, providing knowledge that cannot be recovered once archaeological resources are lost or destroyed. Policies governing federal financial assistance should strengthen, rather than impede, the ability of researchers to conduct high-quality scientific work.

For these reasons, our organizations urge OMB to withdraw or substantially revise the proposed rule to ensure that any updates to federal financial assistance requirements do not unintentionally undermine archaeological research and other scientific disciplines that depend on federal grants.

Sincerely,

The Society for American Archaeology

The Archaeological Institute of America

The Archaeology Division (AD) of the American Anthropological Association