



Public Comment on Proposed Rule: Regulation for Federal Financial Assistance

Docket: OMB-2026-0034

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Executive Summary

The Seismological Society of America (SSA) is the world's leading professional society devoted to earthquake science and its applications. The proposed revisions to 2 CFR Part 200 would undermine the ability of SSA and other scientific societies to advance research that is critical to public safety, economic stability and national security.

Federal investments in earthquake science do not end when a grant is awarded. Those federal investments produce public value through a scientific system that catalyzes research collaboration, facilitates peer review and publication of findings, trains the next generation of scientists and natural hazards professionals, and translates discoveries into applications that save lives and dollars.

SSA provides the infrastructure — including peer review of manuscripts and wide exchange of scientific information — that maximizes the public value of federally funded research. Federal grants fund research, and professional societies play numerous roles to ensure that this research is useful to the public. The proposed revisions would devastate this critical pathway. Under these changes, SSA would lose up to one-quarter of its income, significantly eroding its ability to engage in the critical roles noted above.

We urge OMB to withdraw this rule in its entirety.

Since its origins following the devastating 1906 San Francisco earthquake, SSA's mission has served as the primary forum through which seismologists, earthquake engineers, emergency managers, federal scientists and private-sector practitioners exchange knowledge, establish professional standards and advance the understanding of earthquake hazards that builds a safer world. The following proposed revisions threaten the peer review and collaborative research that support our mission:

Section 200.205—Federal Agency Review of Merit of Proposals

Peer review is the cornerstone of science, and it has been the engine of innovation and economic advancement in the United States for decades. Peer-reviewed research by our members has led to engineering standards that advance and maintain U.S. leadership in making our buildings safe during earthquakes, the computational infrastructure behind earthquake early warning, international monitoring of nuclear weapons testing and major events that affect U.S. interests such as the June 2026 earthquakes in Venezuela, and time-critical alerts for U.S. communities facing multiple hazards including tsunamis or volcanic eruptions.

Empowering senior appointees at federal agencies, regardless of scientific expertise, to evaluate grant proposals based on principles such as “advancing the President’s policy priorities” or “anti-American values” replaces independent scientific evaluation and decades of evidence generated through rigorous research.

The draft references “Gold Standard Science” without definition. This may refer to an Executive Order calling for science that is “subject to unbiased peer review, and without conflicts of interest.” The proposed rule, however, undercuts peer review as the transparent, reproducible mechanism for evaluating research for public benefit.

Section 200.340—Termination and Suspension

Seismological research requires stable, predictable, multi-year funding for the deployment and maintenance of seismometers, ocean buoys, fiber optic sensors and data management tools that are necessary to understand and prepare for natural hazards.

Student and early-career SSA members also depend on consistent funding provided by federal grants as they train to become a highly skilled workforce that serves the U.S. energy, geospatial and engineering industries, national labs, federal and state emergency response agencies, and universities, among other sectors of the economy. According to data from the U.S. Census Bureau and U.S. Bureau of Labor Statistics’ Current Population Survey, there are 340,000 working geoscientists in the U.S., and geoscience jobs are projected to grow 3.7% between 2024 and 2034.

Through this section’s proposed revisions that allow grants to be terminated for discretionary reasons at any time, scientific merit and cost-benefit considerations become secondary to discretionary administrative considerations. Among other changes that would create a chaotic funding environment, an award can be terminated “including when the award no longer advances [Federal] agency priorities or the national interest ...”

Termination under these undefined standards has expansive safety and economic consequences. It risks the public’s prior investment in peer-reviewed projects such as earthquake early warning systems. It disrupts commitments made to states and local communities, including the work of national volcano observatories, to monitor natural hazards.

It also forces young researchers to exit (or never enter) the scientific workforce because support for their training is unreliable.

Their loss from the science community will come at great cost to U.S. global competitiveness and innovation.

Section 200.220—Prohibition of Using Federal Funds for Covered Foreign Collaborations

On March 28, 2025, a magnitude 7.7 earthquake in Myanmar killed thousands of people and caused severe damage to buildings and roads. The rupturing fault is remarkably similar to the San Andreas fault, which runs through the state of California, and seismologists are learning lessons from the Myanmar earthquake that may someday save lives in the U.S.

The June 2026 magnitude 7.2 and 7.5 Venezuelan earthquakes are already providing valuable opportunities for scientific investigation of complex fault ruptures, the effects of local geologic conditions on ground shaking intensity, and impacts on residential and business infrastructure that will be essential to assessing future U.S. earthquake hazard.

Like seismic waves themselves, seismology necessarily transcends national borders. Without access to international seismic networks and collaborations, U.S. researchers lose their ability to monitor hazards and to effectively protect U.S. citizens, and to serve as global leaders in earthquake hazards and science.

The proposed revisions in this section make it more difficult for SSA members to engage fully in international partnerships that support their work. SSA members are especially concerned about the increase in administrative burden caused by these changes, which contradict the rule’s stated goal of reducing “red tape.”

For instance, the prohibition applied “regardless of whether Federal funds are used for direct programmatic activities, research, technical assistance, travel or indirect costs allocable to such collaborations” is especially broad. The increased compliance, oversight obligations and reporting required under this prohibition will slow scientific progress and is likely to prevent American researchers from accessing and contributing to key global data and analyses, with detriment to U.S. interests and leadership in science, technology and innovation.

SSA provides an infrastructure for members to form scientific collaborations, obtain peer review for their research and disseminate their work to inform the public about important findings related to seismic hazard. Implementation of the following proposed revisions severely restricts the financial stability that allows SSA to deliver these services:

Section 200.461—Publication and Printing Costs

Publication of federally funded research is essential to scientific progress, innovative discovery and public accountability. Research findings only become useful to the broader scientific community, decision-makers at all levels and the public when they are subject to peer review, disseminated, archived and made available for future use in perpetuity.

SSA publishes three peer-reviewed journals in service of these goals: the *Bulletin of the Seismological Society of America* (BSSA), *Seismological Research Letters* (SRL), and *The Seismic Record* (TSR). Together these internationally recognized journals serve as the archival record (since 1911) for much of the world’s earthquake science research and provide the trusted mechanism through which federal investments are shared with those responsible for protecting communities from earthquakes.

The proposed revisions in this section to make “publication costs unallowable unless such costs are expressly required by statute or approved in advance by the Federal agency on a case-by-case basis” are a significant change to current federal grant policy.

In effect, these changes overturn previous guidance that allowed SSA members to pay costs such as article processing charges (APCs) and other publishing costs out of their federal awards, which they did often to comply with federal public access requests and ensure maximum usefulness of results from federally supported research.

The revisions also note that “a general requirement to make results publicly available must not be construed as authorizing publication costs,” despite repeated guidance from the Executive Branch that federally funded research must be published under access rules that allow the public to view such funded research in a timely and free manner.

If federal grants, which currently support publication fees, are no longer available to pay these costs, scientific societies like SSA will no longer be able to afford the significant expenses associated with peer review and publishing. For SSA journals, federally-funded authors account for \$600,000 annually — nearly 25% of SSA’s publication revenue.

Scientific societies including SSA are a vital link in the system that communicates research results to U.S. taxpayers and translates research into practical benefits for society. Under the proposed changes in this section, SSA will face severe restrictions on its ability to facilitate the dissemination of peer-reviewed research that is vital to U.S. public safety, economic stability and national security.

Section 200.432—Conferences

Scientific conferences are important forums where research findings begin their transfer into practice and where students and early career professionals establish critical contacts. At SSA’s Annual Meeting and topical conferences, attendees exchange new theories and technologies, engage with private sector partners, review and vet findings, receive technical training, and form vital professional networks, including with state and federal emergency managers who rely on trusted expert contacts during crises.

For decades, scientific conference attendance has been a standard allowable cost under federal grants. The proposed revisions could disrupt attendance by substituting undefined agency considerations for scientific judgment, with restrictions such as “...recipients are not authorized to attend conferences using Federal funds that do not serve to advance program outcomes”



The proposed revisions on allowable conference costs in this section will prevent many of our members, especially students and early-career scientists, from participating in these essential and formative professional events. In a 2026 member survey, SSA found that 48% of attendees at SSA's 2024-2025 meetings depended on federal funding to attend.

Section 200.454—Memberships, Subscriptions, and Professional Activity Costs

Nineteen percent of SSA members rely on federal grant money to pay SSA membership dues, which support their professional training, travel support, private sector connections, and journal access, in service of our mission of advancing earthquake science and seismology worldwide. The proposed restrictions on allowable costs in this section would undermine this mission, at a cost to professional readiness and U.S. scientific leadership.

Conclusion

Federally funded seismic science protects Americans and the places they live and work. That science must be based on peer-reviewed grants, reliable funding structures, sustained national and international collaboration, and timely publication of results.

There are no comparable private funders for seismic research related to earthquakes, volcanoes, tsunamis, and related hazards. SSA members depend on federal dollars to advance and share their research. U.S. citizens and businesses depend on the federal government to allocate those dollars under policies that promote the best science for the greatest public good.

The proposed revisions would substantially weaken the infrastructure connecting scientists with their professional societies to advance, validate, disseminate, and translate taxpayer support into safety, national security and a strong economic future.

SSA respectfully requests that OMB withdraw the proposed rule in its entirety.