

This guide provides some helpful tips on how to structure and draft your comment for the [government portal](#). It is a summary of existing resources created by individual researchers, as well as scholarly and scientific institutions (see *References*). You can also check the [Commenter's Checklist](#) provided by the US Government website: Regulations.gov.

### **Commenting Guide**

- Anyone is free to comment, whether or not you are a US citizen, and comments can be anonymous. Be sure to identify whether you are commenting on behalf of your institution or in your own individual capacity.
- Make your comments unique, personal and fact-based – do not copy/paste because comments that appear to be duplicates will not be counted.
- The comments must be in English. The length of the comment does not matter – quality over quantity! Note: There is a 5,000-character limit for the comment box, but if you want to write more, you can attach a document).
- Please provide the section of the regulation that each comment is referencing by starting each comment with the relevant section number in brackets. *For example; if the comment is on [2 CFR 200.414](#), include the following before the comment [200.414].*
- If you are submitting a comment as an organisation, consider submitting with member signatures attached to demonstrate scale of opposition.
- If possible, identify a conflict between the proposed rule and existing US Law.
- Try to quantify the harm – for example, calculate the dollar value of (multi-year) grants that may be exposed to termination risks from the new rule.
- You can consider structuring your comment around the following:
  - How would you be harmed by the change? (If possible, use numbers to demonstrate the harm.)
  - How certain is it that harm will take place?
  - Did you make important life decisions based on the current rule?
  - What scientific capabilities would be lost if international collaborations were terminated?
  - What additional administrative burdens would this rule add in terms of time or money?
  - Clearly state what you want OMB to do. This can be as simple as: “I urge OMB to withdraw these specific provisions: §200.340, §200.202, §200.205.” or “I urge OMB not to finalise this rule.”

## **Webinar on How to Submit a Comment**

#DefendResearch is hosting weekly Action Hours on **30 June and 7 July at 8am PT/11am ET/5pm CET/3pm GMT** to help people submit comments about the latest OMB proposed rule. We encourage you to attend if you have specific questions on the process of submitting an effective comment.

**Register here:** <https://forms.gle/PPLuo4UAWXQRacf46>)

## **References**

1. [#DefendResearch](#)
2. Elizabeth Ginexi, [This new OMB Rule Is Bigger Than Science. Much Bigger.](#)
3. Elizabeth Ginexi, [What We Need to do NEXT: OMB's Proposed Federal Financial Assistance Rule \(OMB-2026-0034\)](#)
4. Stand Up for Science, [The SUFS Guide to Writing Public Comments](#)
5. National Employment Law Project, [Defend Against Deregulation: A How-to Guide on Writing and Submitting Federal Comments](#)
6. Shagufta Ahmed (OMB), Shannon Joyce (OMB), Adam Looney (The Brookings Institution), [How to effectively comment on regulations](#)
7. Solve ME/CFS Initiative (Solve M.E.), [How to Submit a Public Comment on the Proposed Federal Grant Rule](#)