



2026–27 BOARD OF DIRECTORS

Cherae M. Farmer-Dixon, D.D.S., M.S.P.H.
Chair of the Board

Herminio L. Perez, D.M.D., M.B.A., Ed.D.
Chair-elect of the Board

Todd V. Ester, D.D.S., M.A.
Immediate Past Chair of the Board

Mert N. Aksu, D.D.S., J.D.,
M.H.S.A., Cert DPH
Board Director for Deans

Justin Bower, M.B.A.
Board Director for the Corporate Council

Erin Gross, D.D.S., M.S., Ph.D.
Board Director for Faculties

Marion Manski, M.S., RDH
Board Director for Allied
Dental Program Directors

Thikriat Al-Jewair, D.D.S.,
M.B.A., M.Sc., M.S., FRCD(C)
Board Director for
Advanced Education Programs

Matthew Mara, D.M.D., Ed.D.
Board Director for Sections

Alexis Distefano
Board Director for Students,
Residents and Fellows

Karen P. West, D.M.D., M.P.H.
President and CEO

The mission of ADEA is to develop an inclusive, future-ready oral health workforce prepared to improve the health of all people and communities through leadership, education and collaboration.

555 12th Street, NW, Suite 450
Washington, DC 20004
Phone: 202.289.7201
Fax: 202.289.7204
adea.org

Comments of the American Dental Education Association (ADEA)

On the Office of Management and Budget's Proposed Rule, *Regulation for Federal Financial Assistance*

Strengthening Accountability While Preserving the Federal Partnership That Advances Scientific Excellence, Health Professions Education and Patient Care

The American Dental Education Association (ADEA) appreciates the opportunity to comment on the Office of Management and Budget's (OMB) proposed rule, *Regulation for Federal Financial Assistance*. ADEA supports responsible stewardship of taxpayers' resources and recognizes the importance of accountability, transparency and effective administration of federal financial assistance. The Association believes these objectives are best achieved through policies that preserve independent, scientific judgment, provide regulatory certainty for recipients and promote effective grant management.

ADEA respectfully urges OMB to withdraw the proposed rule because several proposed revisions to the Uniform Guidance would reduce regulatory certainty and increase administrative complexity in ways that could weaken the longstanding federal partnership with academic health institutions and the broader health professions education community that supports scientific excellence, health professions education, workforce development, and patient care. Should OMB elect to proceed, the Association strongly recommends substantial revisions to the proposed rule to preserve independent, scientific peer review, clarify agencies' authority over discretionary awards, maintain stable and predictable federal partnerships, reduce unnecessary administrative burden while preserving strong oversight and maximizing the public's return on federal investment.

Introduction

ADEA is *The Voice of Dental Education*®, representing U.S. and Canadian dental schools, allied dental education programs, advanced dental education programs, academic dental institutions, faculty, students, residents, researchers and oral health professionals committed to advancing the nation's oral and overall health through excellence in education, research, advocacy and patient care.

ADEA's Member Institutions are integral to the nation's academic health infrastructure. Through longstanding partnerships with agencies, including the National Institutes of Health, the National Institute of Dental and Craniofacial Research, the Health Resources and Services Administration, the Centers for Disease Control and Prevention and others, these

institutions educate future oral health professionals, conduct biomedical and clinical research, strengthen the oral health workforce and provide essential care to millions of patients. Federal financial assistance administered under the *Uniform Guidance* is fundamental to these integrated missions, supporting research, education, community partnerships and the translation of scientific discoveries into improved patient care.

ADEA supports strong oversight of federal financial assistance and believes accountability is essential to maintaining the public's trust. At the same time, accountability is best achieved through policies that reinforce—not weaken—the independent, merit-based processes and well-established framework for administering federal financial assistance. ADEA is concerned that several proposed revisions could diminish the role of independent scientific peer review, reduce regulatory certainty, and increase administrative complexity without corresponding improvements in accountability, thereby weakening the framework that has long supported scientific discovery, health professions education, workforce development, and patient care.

The comments that follow address the proposed revisions of greatest significance to academic dentistry and recommend revisions that would preserve independent, scientific peer review, maintain regulatory certainty and strengthen accountability while preserving the longstanding federal partnership that serves students, researchers, educators, patients and the public.

I. Preserving Independent, Scientific Peer Review Is Essential to Scientific Excellence and the Public's Trust

ADEA is concerned that several provisions of the proposed rule would permit broader consideration of policy priorities and other factors in discretionary funding decisions in ways that could diminish the longstanding role of independent, merit-based scientific peer review. While federal agencies appropriately establish research priorities and funding objectives, scientific judgments regarding the comparative merit of individual research proposals should continue to rest principally with qualified, subject-matter experts who apply objective, evidence-based review criteria. Agencies' priorities and independent, scientific peer review should complement—not compete.

Independent, scientific peer review has long been the cornerstone of the federal research enterprise and the principal mechanism through which scientific excellence, accountability and the public's confidence are achieved. By relying on transparent, scientifically rigorous evaluation, federal agencies have helped ensure that taxpayers' resources are invested in research with the greatest potential to advance knowledge, improve health and serve the public's interest.

For academic dental institutions, independent, scientific peer review provides the stable foundation upon which institutions recruit faculty, educate future clinician-scientists,

develop research programs and make long-term investments in research infrastructure. The public's confidence in federally supported research depends not only on responsible stewardship of taxpayers' resources, but also on confidence that research funding decisions are guided principally by scientific merit rather than evolving policy considerations.

Accordingly, ADEA encourages OMB to reaffirm that independent, scientific merit-based review remains the principal basis for discretionary research funding decisions and that any additional agency review appropriately complements—rather than supplants—the peer-review process. Preserving this longstanding framework is fully consistent with responsible stewardship of taxpayers' resources and essential to maintaining the public's confidence in the federal research enterprise while maximizing the public's return on federal investment.

II. Preserving Stable Federal Partnerships Requires Regulatory Certainty

ADEA is concerned that several provisions of the proposed rule would expand agencies' discretion to suspend or terminate discretionary awards based on agencies' evolving priorities or changing determinations regarding the national interest, also while providing recipients with limited procedural protections. Although federal agencies must retain appropriate authority to address fraud, waste, abuse, material noncompliance and poor performance, the proposed revisions could create unnecessary uncertainty for recipients operating in compliance with applicable award requirements.

For academic health institutions and the broader health professions education community, regulatory certainty is an essential component of responsible stewardship. Academic dental institutions make significant long-term investments in research infrastructure, faculty recruitment, graduate education, residency training, clinical facilities and community partnerships based on competitively awarded federal funding. Uncertainty regarding the continuity of federal awards may discourage these investments, disrupt education and research, weaken community partnerships and ultimately, reduce the public's return on federal investment.

ADEA recognizes that agencies must retain flexibility to protect taxpayers' resources. However, existing provisions of the Uniform Guidance already provide substantial authority to address noncompliance, financial mismanagement, fraud, waste, abuse and performance deficiencies. The final rule should preserve those authorities while providing clearer standards governing the suspension or termination of discretionary awards and appropriate procedural protections for recipients.

Regulatory certainty strengthens accountability—it does not diminish it. Accordingly, ADEA encourages OMB to revise the proposed rule to maintain the stable and predictable regulatory framework that has long supported scientific discovery, health professions education, workforce development and patient care.

III. Effective Grant Management Should Strengthen Accountability Without Unnecessarily Increasing Administrative Burden

Comments of the American Dental Education Association (ADEA) on the Office of Management and Budget's Proposed Rule, *Regulation for Federal Financial Assistance*

Page 4

ADEA is concerned that several proposed revisions would expand administrative requirements and compliance expectations without a corresponding improvement in accountability or program integrity. While effective oversight is essential to protecting taxpayers' resources, new administrative obligations should be carefully tailored to the risks they are intended to address and should not divert institutional resources from the educational, research and clinical activities that federal financial assistance is intended to support.

Academic health institutions already operate within comprehensive financial management, compliance, audit and oversight frameworks that provide multiple layers of accountability for federal awards. The proposed rule should build upon these existing safeguards rather than impose duplicative or unnecessarily burdensome requirements that reduce institutional capacity for education, research and patient care.

ADEA is also concerned that aspects of the proposed rule affecting the management and dissemination of federally supported research could unintentionally discourage scientific collaboration and timely communication of research findings. The public's return on federal investment depends not only on supporting high-quality research, but also on ensuring that discoveries are disseminated through peer-reviewed publications, scientific collaboration and translation into education, clinical practice and improved patient care.

Accordingly, ADEA encourages OMB to revise the proposed rule to ensure that new administrative requirements are risk-based, avoid duplicating existing oversight mechanisms and preserve reasonable flexibility for research dissemination and scientific collaboration. Doing so will strengthen accountability while maximizing the public's return on federal investment.

Conclusion

ADEA appreciates the opportunity to comment on OMB's proposed revisions to the *Uniform Guidance* and recognizes OMB's important role in promoting responsible stewardship of taxpayers' resources. The Association supports strong accountability, transparent administration and effective oversight of federal financial assistance. Those objectives, however, are best achieved through policies that preserve independent scientific judgment, provide regulatory certainty and ensure that administrative requirements are appropriately tailored to risk.

ADEA is concerned that several proposed revisions would broaden agencies' discretion in discretionary funding decisions, expand agencies' authority to suspend or terminate awards without sufficient regulatory certainty for recipients and increase administrative requirements without a corresponding improvement in accountability. Collectively, these changes could weaken the longstanding federal partnership that has advanced scientific discovery, health professions education, workforce development and patient care.

Comments of the American Dental Education Association (ADEA) on the Office of Management and Budget's Proposed Rule, *Regulation for Federal Financial Assistance*

Page 5

Accordingly, ADEA respectfully urges OMB to withdraw the proposed rule. Should OMB elect to proceed, the Association strongly encourages OMB to substantially revise the proposal to preserve independent scientific peer review, clarify the standards governing agencies' discretion over discretionary awards, maintain appropriate procedural protections for recipients and ensure that new administrative requirements strengthen accountability without unnecessarily burdening institutions.

The *Uniform Guidance* has long supported a federal partnership that promotes scientific excellence, responsible stewardship and meaningful benefit to the public. The final rule should preserve—and strengthen—that partnership by ensuring that accountability, innovation and scientific integrity remain mutually reinforcing objectives.

Respectfully submitted,

American Dental Education Association