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July 6, 2026

Office of Management and Budget
Attention: Docket OMB-2026-0034
Re: Regulation for Federal Financial Assistance

I. Introduction and Interest in the Rule

The Academy of Aphasia appreciates the opportunity to comment on the proposed Regulation for Federal Financial Assistance (Docket OMB-2026-0034).

The Academy of Aphasia is an international interdisciplinary organization composed of leading researchers and clinicians dedicated to advancing the scientific study of aphasia and related neurogenic communication disorders. Our members include speech-language pathologists, neurologists, psychologists, neurolinguists, neuroscientists, rehabilitation scientists, and other experts. Many Academy members are US-based and conduct research supported by the National Institutes of Health (NIH) and other federal agencies.

The Academy has a direct interest in this proposed rule because federal financial assistance supports a substantial proportion of aphasia research in the United States. Changes to the administration, oversight, dissemination, or termination of federally funded awards will directly affect scientific discovery and the health and well-being of people living with aphasia.

II. Background and Relevant Provisions

The Academy comments specifically on those aspects of the proposed regulation that threaten:

1. Preservation of independent scientific merit review and evidence-based scientific priority-setting (§§ 200.205, 200.300)
2. Protection for the stability and continuity of ongoing research (§ 200.340)
3. Support for dissemination and scientific exchange (§§ 200.432, 200.454, 200.461)
4. Safeguarding collaborative and interdisciplinary aphasia research (§§ 200.205, 200.300, 200.432, 200.454)

Aphasia is an acquired language disorder that affects language and communication – including speaking, understanding, reading, and writing – most commonly following stroke or traumatic brain injury. More than two million Americans live with aphasia, and approximately 180,000 Americans acquire aphasia each year. Aphasia is a significant public health issue associated with reduced participation in employment, social activities, healthcare decision-making, and community life. Medical expenses, lost wages, and the cost of informal care for post-stroke aphasia alone are estimated to cost Americans \$15.8 billion annually over and above the stroke-related costs for individuals without aphasia.

III. Analysis of Potential Impacts by Proposed Revisions

A. Proposed §§ 200.205 and 200.300: Effects on Scientific Merit Review, Scientific Priority-Setting, and Research Administration

The Academy is concerned that revisions to §§ 200.205 and 200.300 that expand non-scientific review or discretionary oversight of funding decisions will diminish the central role of expert peer review in determining scientific merit and establishing evidence-based scientific priorities.

Aphasia research is highly specialized and interdisciplinary, incorporating neuroscience, rehabilitation science, linguistics, psychology, community-engaged research, and dissemination & implementation (D&I) science. The scientific merit of such proposals can only be appropriately evaluated by experts with relevant disciplinary expertise.

A reduction in reliance on independent expert review will disproportionately affect smaller scientific fields, including aphasia research, because these fields already compete for limited resources and require specialized expertise to evaluate innovation and significance. Such changes will slow development of new rehabilitation interventions and delay translation of scientific discoveries into clinical practice.

The Academy is additionally concerned that increased administrative requirements or ambiguous national policy requirements under §§ 200.205 and 200.300 will create unnecessary burdens for investigators conducting rehabilitation and implementation research. Research involving individuals with aphasia often requires innovative approaches to recruitment, informed consent, supported communication, and community engagement. Additional administrative complexity risks discouraging disability studies and engagement of the public in research.

Recommendation: OMB should ensure that scientific merit review remains grounded in independent expert peer review and that implementation of §§ 200.205 and 200.300 does not create unnecessary barriers to conducting rigorous, applicable research in disabilities.

B. Proposed § 200.340: Effects on the Stability and Continuity of Ongoing Research

The Academy is particularly concerned about revisions to § 200.340 expanding agency authority to terminate active awards.

Aphasia research commonly involves longitudinal studies, clinical trials, implementation studies, and community-based interventions that require years of participant follow-up. Unexpected termination of active awards would result in loss of irreplaceable longitudinal data, disruption of intervention studies, harm to participants who depend on continued follow-up, loss of trust among community partners, and waste of prior federal investment.

Individuals living with aphasia frequently participate in research over extended periods and invest substantial time and effort despite significant communication challenges. Premature termination of studies risks undermining participant trust and reducing future participation in research.

Recommendation: The Academy urges OMB to limit termination authority under § 200.340 to clearly defined circumstances involving documented noncompliance, research misconduct, fraud, or other established regulatory violations and to preserve due process protections for recipients.

C. Proposed §§ 200.432, 200.454, and 200.461: Effects on Dissemination, Scientific Exchange, and Professional Activities

The Academy is concerned that revisions affecting conference-related costs (§ 200.432), professional society activities (§ 200.454), and publication costs (§ 200.461) will impede dissemination of federally funded research findings.

Aphasia rehabilitation research depends upon rapid dissemination of findings to clinicians, researchers, individuals living with aphasia, caregivers, and community organizations. Scientific conferences, peer-reviewed publications, and professional society activities are essential mechanisms for disseminating evidence-based practices, training early-career investigators, and accelerating implementation of research findings.

Restrictions on these activities will lead to:

- Delayed implementation of evidence-based interventions;
- Reduced access to emerging scientific knowledge among clinicians and community providers;
- Slower translation of federally funded discoveries into routine clinical practice; and
- Reduced return on federal investment in rehabilitation research.

These consequences will be particularly significant in aphasia, for which evidence-based interventions continue to evolve and where known implementation gaps already exist.

Recommendation: OMB should explicitly preserve reasonable costs associated with scientific conferences, publication, open-access dissemination, and professional society participation as allowable and essential components of federally funded research.

D. Proposed §§ 200.205, 200.300, 200.432, and 200.454: Effects on Collaborative and Interdisciplinary Research

Aphasia research relies heavily on collaboration across institutions and countries because individual research centers often cannot recruit sufficiently large and diverse participant samples independently.

Multisite and international collaborations have enabled advances in treatment efficacy, outcome measurement, neuroimaging, telehealth, implementation science, and community participation research. Policies that discourage or complicate collaborative activities will threaten scientific rigor, impede replication, and reduce the generalizability of research findings.

For individuals living with aphasia, slower scientific progress ultimately means delayed access to improved rehabilitation approaches and community participation interventions.

Recommendation: OMB should ensure that implementation of these provisions does not unnecessarily restrict interinstitutional or international scientific collaboration that is essential for advancing rehabilitation science.

E. Cross-Cutting Effects on Wellness and Community Participation for People with Aphasia

Research supported through federal financial assistance has substantially improved the long-term health and wellness of people with aphasia.

Federally funded studies have contributed to:

- Development of effective communication interventions and strategies for people with aphasia;
- Training of US-based clinicians and researchers specializing in aphasia;
- Expansion of telehealth service delivery;
- Better understanding of recovery trajectories;
- Improved caregiver support programs;
- Creation of community-based aphasia groups and services; and
- Increased opportunities for participation in educational, vocational, cultural, and civic activities.

People with aphasia experience elevated rates of social isolation, depression, and reduced quality of life. Continued federal support for rigorous, collaborative, and translational research is therefore essential not only for scientific advancement but also for improving health, participation, and overall well-being.

IV. Recommendations

The Academy respectfully recommends that OMB:

1. Preserve independent expert peer review as the primary basis for evaluating scientific merit and establishing research priorities.
2. Ensure that implementation of §§ 200.205 and 200.300 does not create unnecessary barriers to disability research.
3. Limit termination authority under § 200.340 to clearly defined circumstances and preserve due process protections.
4. Preserve allowable costs associated with conferences, publications, and professional society activities.
5. Ensure that implementation of the final rule does not unnecessarily restrict interinstitutional or international scientific collaboration.
6. Consider the cumulative effects of the proposed revisions on rehabilitation research and on people with disabilities, including people living with aphasia.

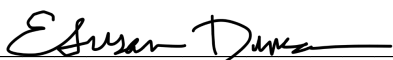
V. Conclusion

The Academy of Aphasia strongly supports responsible stewardship of federal funds. However, the Academy is concerned that certain provisions of the proposed regulation will unintentionally impede scientific collaboration, slow dissemination of research findings, and reduce progress in aphasia rehabilitation research.

Because people living with aphasia depend upon continued scientific advances to improve communication, participation, and wellness, the Academy respectfully urges OMB to revise the proposed rule in accordance with the recommendations outlined above.

Thank you for considering these comments. The Academy of Aphasia would welcome the opportunity to provide additional information regarding the implications of this proposed rule for communication disorders and rehabilitation research.

Respectfully submitted,



E. Susan Duncan, PhD, CCC-SLP
Chair, Board of Governors
Academy of Aphasia



H. Branch Coslett, MD
Secretary
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