



July 13, 2026

Office of Management and Budget

Re: Regulation for Federal Financial Assistance, Docket No. OMB-2026-0034

To Whom It May Concern:

The American Institute of Aeronautics and Astronautics (AIAA) appreciates the opportunity to provide comments on the proposed Regulation for Federal Financial Assistance.

AIAA is our country's oldest and largest aerospace technical society, representing over 33,000 individual members and more than a hundred corporate members across the civil, commercial, and national security sectors. Our membership spans aerospace engineers, researchers, astronauts, industry leaders, government experts, distinguished professors, undergraduate and graduate students.

Through our technical conferences, peer-reviewed journals, books, standards development, workforce initiatives, and educational programs, AIAA advances aerospace engineering and the development of new technologies that help America maintain leadership in air and space. AIAA serves as a neutral, nonpartisan convener dedicated to U.S. leadership in aerospace science, engineering, and technology.

AIAA shares the Administration's commitment to accountability, transparency, and responsible stewardship of taxpayer resources. Federal financial assistance for basic aerospace research enables the United States to develop new technologies, cultivate engineering talent, and build the industrial capabilities that underpin our national security and global competitiveness. We urge that the final rule be evaluated for its potential impact on the nation's aerospace and defense innovation ecosystem — strengthening new theoretical and experimental development rather than inadvertently constraining it.

Preserving Merit-Based Technical Excellence

Our Institute encourages the Office of Management and Budget (OMB) to ensure that the final rule preserves the collaboration and rigor that have long characterized the nation's aerospace research enterprise. America remains the global leader in aerospace innovation because of a highly integrated ecosystem that brings together industry, government agencies, research institutions, and technical societies. The final rule should strengthen that ecosystem — not impose barriers that limit participation, increase administrative burden, constrain technical collaboration, or diminish the public value of federally funded research.



AIAA recommends OMB preserve the primacy of technical merit in federal funding decisions. Additional agency review for consistency with law and national priorities should complement, rather than diminish, the central role of objective technical evaluation. We recognize the Administration's legitimate interest in aligning federal awards with statutory requirements and agency missions. However, America's leading aerospace research enterprises were built on competitive processes grounded in engineering rigor and technical merit. That foundation must be preserved.

AIAA's member organizations include federally funded research and development centers, laboratories, corporations, and universities who actively compete for research grants. Confidence in the objectivity and transparency of agency funding decisions is essential to sustaining innovation and U.S. technological leadership. The Institute urges OMB to affirm that merit review remains the foundation of discretionary research funding and that any additional review mechanisms are implemented in a manner that preserves transparency, consistency, and technical integrity.

Basic Research strengthens our Defense Industrial Base

The Department of War has identified the following Critical Technology Areas as essential to preserving the Nation's technological and military superiority including Applied Artificial Intelligence, Biomanufacturing, Contested Logistics Technologies, Quantum and Battlefield Information Dominance, Scaled Hypersonics, and Scaled Directed Energy. These areas provide a strategic framework for prioritizing federal research and development investments, accelerating technology transition, and strengthening collaboration across government, academia, nonprofit research organizations, and industry.

These six critical capability areas emerged after decades of federally supported research conducted at universities, government laboratories, nonprofit organizations, industry, and professional scientific societies. According to the National Center for Science and Engineering Statistics, the Department of War supported approximately \$10.2 billion in higher education research and development in Fiscal Year 2024, including roughly \$5.5 billion for basic engineering research. Federal funding also accounted for approximately 77 percent of university research expenditures in aerospace, aeronautical, and astronautical engineering. These investments are not merely academic: they build key technologies, workforce, and research capacity that strengthen America's defense industrial base and operational military advantage.

For example, the development of hypersonic technologies illustrates why preserving an effective federally funded research ecosystem is a national security imperative. In a 2024 report entitled *Hypersonic Weapons: DOD Could reduce Cost and Schedule Risks by Following Leading Practices*, the Government Accountability Office found that successful hypersonic development depends on sustained investment in research, engineering, testing infrastructure, and technology maturation before systems can transition into operational capability built by industry.



AIAA strongly supports efforts to protect sensitive U.S. technologies, address inappropriate foreign influence, and strengthen America's research security. These objectives are indispensable in today's strategic environment.

At the same time, federal research security policies should be precise and risk-based, distinguishing strategic competitors from trusted allies while preserving legitimate technical collaboration. The Department of War itself recognizes that technological superiority depends on collaboration across the defense innovation ecosystem — universities, federally funded research and development centers, nonprofit organizations, commercial industry, and trusted international allies and partners.

The U.S. aerospace enterprise depends on carefully managed collaboration across these communities. Ambiguity about foreign collaboration requirements, compliance obligations, or administrative approvals could discourage participation in federally funded research without producing corresponding security benefits. AIAA therefore encourages OMB to issue clear implementation guidance and narrowly tailored standards that protect national security while preserving legitimate technical cooperation with trusted partners.

Protecting the National Security Innovation Infrastructure

Nonprofit technical societies like AIAA are an important component of our Nation's research infrastructure. Federal research achieves its greatest taxpayer value not when projects are completed, but when discoveries are disseminated, validated, and transitioned into operational capability. America's professional technical societies drive this process by convening technical experts, publishing research, developing consensus standards, educating future engineers, and providing a neutral forum for collaboration among government, academia, and industry.

Technical conferences and meetings are integral to the federal research enterprise. For many federally funded projects, these activities are not ancillary to the award — they are the principal means by which findings are disseminated, subjected to peer review, validated by the broader research community, and transitioned into engineering practice. They connect federal agencies, universities, federally funded research and development centers, nonprofit organizations, and industry, accelerating new technology maturation, consensus standards, workforce development, and the movement of research into operational capability. The strength of America's aerospace enterprise has always depended on this rapid technical learning across institutional boundaries.

Accordingly, AIAA encourages OMB to clarify that reasonable costs associated with attending technical conferences, workshops, and professional meetings remain allowable where they directly support the objectives of a federal award. Such clarification would strengthen accountability while preserving a key mechanism through which federally funded research produces measurable public benefit.



Administrative Burden and Workforce Development

Federal research funding is an investment in the Nation's future workforce. Universities supported through federal research awards educate the next generation of engineers, scientists, and technical professionals who ultimately sustain the aerospace and defense industrial base.

AIAA is concerned that increased federal compliance obligations, expanded administrative requirements, and additional certification processes may disproportionately affect smaller research institutions, emerging aerospace programs, nonprofit organizations, and startup technology companies. These smaller organizations often contribute disproportionately to innovation while possessing comparatively limited administrative resources.

The final rule should therefore ensure that compliance requirements remain proportional to risk and do not unintentionally discourage participation in federally supported aerospace research. Energy diverted from basic research to unnecessary administrative compliance represents a lost opportunity for innovation, workforce development, and technology transition.

AIAA's Recommendations

1. Preserve scientific and technical merit review as the primary guidance for Federal agencies awarding research grants.
2. Implement research security requirements through targeted, risk-based measures that distinguish between strategic competitors and trusted allies.
3. Ensure that compliance obligations remain proportional to institutional risk and administrative capacity.
4. Recognize the role of professional technical societies as part of the Nation's research and innovation infrastructure.
5. Preserve federal government support to attend U.S. technical conferences, publish in peer-reviewed journals, engage in standards development, and conduct technical exchange activities that advance federally funded research objectives.
6. Provide clear implementation guidance that enables universities, nonprofit organizations, research institutions, and professional societies to comply with the rule while advancing the public interest served by investments in Federal research.

Conclusion

America's aerospace sector faces significant challenges in the years ahead, including strengthening our national competitiveness, developing the future workforce, accelerating innovation, modernizing the country's aviation infrastructure, and advancing technical discovery. Federal financial assistance programs play an important role in supporting these national objectives.



America's aerospace engineers encourage OMB to ensure that the final rule strengthens accountability and research security while preserving the vital ecosystem that enables technical excellence, workforce development, and our Nation's aerospace leadership. Doing so will help ensure that federal financial assistance continues to advance both responsible stewardship of taxpayer resources and the Nation's long-term security and technological competitiveness.

Thank you for considering our comments. AIAA would welcome the opportunity to engage further with OMB and participating agencies as this rulemaking proceeds.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Clay Mowry". The signature is fluid and cursive, with a long horizontal stroke at the end.

Clay Mowry
Chief Executive Officer
The American Institute of Aeronautics and Astronautics (AIAA)