



Comments of The Wildlife Society on the Proposed Rule: Regulation for Federal Financial Assistance

Submitted to the Office of Management and Budget, OMB-2026-0034

The Wildlife Society appreciates the opportunity to provide comments regarding the proposed revisions to the regulations governing federal financial assistance. We offer these comments on behalf of wildlife professionals whose work lies not in election cycles, fiscal years, or changing political priorities, but in the enduring relationships among land, water, wildlife and people and in the dynamic ecological processes that sustain them.

A forest does not recognize a four-year planning horizon. A migratory bird does not alter its course because administrative priorities have shifted. Threatened species do not pause their decline while agencies reconsider funding criteria. Maintaining the delicate balance of all life on earth requires knowledge, skill and patience. The proposed rule risks weakening our collective ability to steward the land across generations and threatens to undermine many of the scientific, professional and institutional foundations upon which conservation depends.

The Wildlife Society stands in firm opposition to the Office of Management and Budget's proposed regulation for federal financial assistance.

Conservation Requires Stability Beyond Political Cycles

Human activities are a major driver of ecosystem disruption worldwide.ⁱ The maintenance, restoration and enhancement of ecosystems that support fish, wildlife and human communities are among the longest and most important of human endeavors.ⁱⁱ The return of an endangered species, the recovery of a watershed, the rebuilding of a prairie or the reestablishment of a migratory corridor often requires decades of continuous effort.

The proposed emphasis on aligning federal assistance with evolving administrative priorities introduces uncertainty where continuity is most needed. Federal grants



should be administered pursuant to statutory intent and sound science, not through frameworks that may require substantial reinterpretation with each successive administration. Such instability complicates long-term conservation planning and threatens the effectiveness of ongoing restoration efforts. Many of these efforts are guided by State Wildlife Action Plans, species recovery plans and other long-term conservation strategies that are deliberately designed to operate across multiple administrations and funding cycles.ⁱⁱⁱ

The Wildlife Society has similarly emphasized the importance of regulatory stability and science-based implementation in its comments on recent rulemaking related to the National Environmental Policy Act^{iv} and Endangered Species Act.^v

Conservation succeeds when objectives persist long enough for nature to respond.

Relevant OMB Provisions: § 200.202 – Program planning and design

The proposed revisions would require federal programs to be designed with goals and objectives that align with administration priorities, creating the potential for substantial shifts in funding emphasis between administrations.

Science Must Remain the Compass

Wildlife management has advanced because society increasingly relies upon evidence rather than preference. Population estimates, habitat assessments, restoration metrics, disease surveillance and ecological monitoring provide the information upon which sound public policy depends.

The proposed rule appears to create additional opportunities for funding decisions to be evaluated according to broad policy priorities rather than solely according to statutory and technical merit. While elected officials properly establish policy direction, conservation programs function best when scientific evidence remains the principal guide for identifying ecological need. The Wildlife Society is concerned that funding decisions could become increasingly influenced by policy priorities rather than scientific merit alone, which would run counter to The Wildlife Society's position statement on The Use of Science in Policy and Management Decisions.^{vi}

The obscure mussel in a river, the bat in a cave, or the rare plant upon a windswept ridge possess no constituency except the scientists and managers who document



their spread or decline. Their conservation depends upon institutions willing to recognize ecological importance or threats even when political visibility is absent.

A land ethic, upon which organizations like The Wildlife Society are built, asks us to value species not because they are popular, but because they are members of the biotic community upon which all life depends.

Relevant OMB Provisions: § 200.205 – Federal agency merit review of proposals

The proposal would establish a pre-issuance review process under which discretionary awards must demonstrably advance presidential policy priorities and comply with additional administration-established criteria. This could negatively impact important work on species with less political visibility.

Peer-Reviewed Science Is a Public Trust

The Wildlife Society is concerned that changes which introduce uncertainty into federal assistance programs may have consequences extending beyond individual grants. Federal funding supports much of the research that ultimately becomes the peer-reviewed scientific literature upon which wildlife management decisions depend.

The conservation community relies upon a continual process of observation, investigation, publication and review. Wildlife professionals collect data in the field, analyze results, publish findings and subject those findings to scrutiny by their colleagues. Through this process, knowledge accumulates and management improves. Species recovery plans, harvest regulations, habitat restoration strategies, disease response protocols and climate adaptation efforts all benefit from the available body of peer-reviewed science.

The proposed rule should therefore be evaluated not only according to its administrative effects, but also according to its potential effects on the production of scientific knowledge. When funding uncertainty disrupts research programs, limits collaboration or reduces the capacity of scientists to conduct long-term studies, the resulting loss is not merely institutional. It is a loss to the public's understanding of wildlife and ecosystems.

Conservation cannot proceed solely on conviction. It requires evidence. Peer review remains among the most reliable tools society has developed to separate what we hope is true from what experience demonstrates to be true. The proposal threatens to reduce opportunities for the scientific collaboration, publication and dissemination activities that support one of the most vital and irreplaceable components of American science: independent, expert peer review.^{vii}

Relevant OMB Provisions: § 200.461 – Publication and Printing Costs

The proposed rule would revise allowable-cost provisions and impose additional limitations on publication and related expenditures that often support scientific communication and dissemination.

Professional Societies Strengthen Conservation Capacity

The Wildlife Society and other professional scientific organizations serve an essential role in conservation. They create forums through which biologists, researchers, managers, educators and students exchange information, establish professional standards and translate scientific knowledge into practical management applications.

Healthy conservation institutions depend upon communities of practice. Individual scientists may gather data, but shared understanding emerges only when that knowledge is communicated, challenged, refined and applied. Professional societies provide the structure through which this exchange occurs.

Many federal assistance programs directly or indirectly support participation in professional societies through collaborative grants, cooperative agreements, research partnerships and workforce development activities. Policies that make participation in federally funded scientific collaborations more difficult may gradually weaken the professional networks that conservation depends upon.

A healthy scientific profession is itself a conservation asset.

Relevant OMB Provisions: § 200.454 – Memberships, Subscriptions, and Professional Activity Costs

Proposed revisions would place new limitations on costs associated with professional engagement activities, which could weaken engagement.

Scientific Meetings and Conferences Are Working Landscapes of Ideas

The Wildlife Society is particularly concerned about any regulatory framework that may discourage participation in scientific meetings, technical workshops and professional conferences.

To some observers, a conference may appear merely as a gathering of specialists with no specific outcome or immediate deliverables. To those who work in conservation, though, it is something more important. It is where a wildlife disease emerging in one region is recognized before it appears in another. It is where a graduate student's research informs a state management plan. It is where tribal biologists, state agencies, federal scientists, nongovernmental organizations and university researchers build the relationships that make future conservation partnerships possible.

Many of the most important advances in wildlife conservation begin not with formal regulations but with conversations among professionals seeking solutions to shared problems.

The value of these meetings cannot always be measured in immediate deliverables. Their contribution lies in the exchange of ideas, the development of partnerships, the mentoring of future professionals and the dissemination of new scientific findings.^{viii} Restrictions or uncertainties that reduce participation in these venues may produce effects that are diffuse and difficult to quantify, but no less consequential for conservation.

While we recognize that the proposed OMB rules do not prohibit professional conference attendance, The Wildlife Society notes that professional conferences, technical workshops and scientific meetings are often selected in response to evolving research findings that cannot be anticipated at the time of the award. If participation in scientific conferences becomes subject to additional approval requirements or heightened scrutiny through award terms and conditions, such constraints may limit the effective dissemination of scientific information and reduce opportunities for collaboration.

The Wildlife Society encourages OMB to maintain flexibility that allows recipients to attend the most relevant scientific and professional forums as conservation needs evolve throughout the award period.



Relevant OMB Provisions: § 200.432 – Conferences

The proposed revisions specifically identify conferences among the categories of expenditures subject to new restrictions and oversight that could reduce engagement at professional conference events.

Conservation Benefits When All Communities Can Participate

Just as healthy ecosystems derive resilience from biological diversity, conservation institutions derive strength from the inclusion of people with different viewpoints, experiences and forms of expertise. Policies that create uncertainty around these efforts risk narrowing the community of conservation practitioners at a time when wildlife management faces increasingly complex challenges.

The Wildlife Society, in our Position Statement on Workforce Diversity within the Wildlife Profession, recognizes that effective stewardship of the land depends upon the participation of people from many backgrounds, experiences and communities.^{ix} Fish, wildlife and ecosystems belong to no single profession, constituency or culture. Conservation has been strengthened by the contributions of tribal nations, rural communities, hunters and anglers, private landowners, academic researchers, public servants and citizens whose connection to the natural world arises from different histories and traditions.

Federal assistance programs have long helped broaden opportunities for education, training, professional development and participation in conservation science. These investments strengthen the profession by drawing upon the widest possible range of talent, experience and knowledge. A conservation community that welcomes diverse perspectives is better equipped to understand complex ecological challenges and to earn the public trust necessary for long-term stewardship.

Relevant OMB Provisions: § 200.205 – Federal agency merit review of proposals

The proposed rule would prohibit federal assistance from supporting certain diversity, equity and inclusion activities and would require political review of discretionary awards for compliance with those restrictions.



Tribal Conservation Partnerships Merit Particular Protection

Many fish and wildlife conservation objectives are achieved through co-management arrangements among tribes, states and federal agencies, making tribal participation essential to successful conservation outcomes.^x

Tribal nations manage significant habitats, protect culturally important species, contribute unique ecological knowledge and participate in cooperative wildlife management across jurisdictional boundaries. Effective partnerships depend upon trust, flexibility and reliable access to federal resources.

The proposed rule may create additional challenges for smaller tribal natural resource departments that already operate with limited administrative capacity. Furthermore, conservation priorities developed by tribal governments may not always align perfectly with shifting federal priorities. Wildlife conservation benefits when tribal self-determination and local stewardship remain central components of federal assistance programs.

Many of the continent's remaining strongholds for fish, wildlife and intact ecosystems exist because Indigenous peoples maintained relationships with land long before modern conservation institutions emerged. Federal policy should strengthen those relationships, not complicate them.

Relevant OMB Provisions: § 200.205 – Federal agency merit review of proposals

Expanded pre-award review and priority-alignment requirements may affect tribes that manage conservation programs under priorities established through tribal governance structures, treaty obligations and resource-management plans.

Investing in the Next Generation of Conservation Professionals

The long-term success of American wildlife conservation depends upon recruiting, training and retaining skilled professionals. Students and early-career biologists often gain their first opportunities to present research, receive mentorship and build professional networks through society meetings and scientific conferences.

Federal investments in conservation yield returns not only through immediate project outcomes but also through the development of future expertise. A young



scientist presenting research today may become tomorrow's state wildlife director, tribal wildlife manager, field supervisor or university researcher.

Conservation is ultimately a relay rather than a sprint. Each generation inherits knowledge from those who came before and bears responsibility for passing that knowledge forward.

Federal assistance policies should recognize that professional development, scientific exchange and workforce capacity are not ancillary benefits of conservation programs. They are among the mechanisms by which conservation endures across generations.

Relevant OMB Provisions: Overall effect of proposed rule and sections identified within these comments

Because many student and early-career training opportunities occur through federally supported research, workshops and professional meetings, changes affecting these activities may influence recruitment and retention within the conservation workforce.

Long-Term Monitoring Is the Foundation of Conservation

The nation relies upon long-term datasets collected over decades to understand population trends, habitat change, disease emergence, climate adaptation and ecosystem health. These monitoring programs frequently lack political visibility because their value lies not in immediate outcomes but in accumulated knowledge.

If funding becomes less predictable, monitoring programs are often among the first activities to suffer. Yet a broken dataset cannot simply be repaired. Missing years of information may permanently diminish scientific understanding. The consequences may not become apparent until years later, when managers discover they lack the information necessary to guide conservation decisions. We know what we know about wildlife because someone measured it repeatedly for a very long time.

Federal assistance programs should continue supporting that continuity without creating unnecessary risks of sudden suspension or termination.



Relevant OMB Provisions: § 200.340 – Termination and suspension

The proposal would expand federal authority to suspend or terminate awards that no longer effectuate agency priorities or the national interest.

The Burden of Administration Is Also a Conservation Cost

The Wildlife Society recognizes the need for adequate federal funding and agency staffing to ensure efficient conservation action^{xi} and is concerned that expanded administrative requirements may impose disproportionate burdens upon the agencies and organizations responsible for implementing conservation programs.

Across the nation, wildlife agencies, tribes, universities and conservation organizations already face staffing limitations. When additional hours are devoted to documentation, review, certification and compliance activities, those hours are no longer available for habitat management, wildlife surveys, restoration work or public engagement.

A biologist behind a desk is sometimes necessary. A biologist who can no longer reach the field is a conservation loss.

Administrative efficiency should therefore be evaluated not merely as a managerial concern, but as a conservation outcome.

Relevant OMB Provisions: § 200.205 – Federal agency merit review of proposals

Multiple stakeholder analyses conclude that the proposal would increase compliance, review, reporting and administrative obligations for grant recipients counter to the proposal's stated objective of reducing recipient burden.

America's Wildlife Conservation Success Depends Upon Stable Institutions

The Wildlife Society is concerned that provisions of the proposed rule addressing award prioritization, pre-award review, administrative oversight, allowable costs, collaborative activities and award termination may collectively erode the continuity and cooperation upon which conservation depends.



Competitive wildlife conservation grants, cooperative agreements and research partnerships could experience substantial changes in award evaluation criteria, review procedures and funding priorities. Since many emerging conservation challenges are addressed through discretionary funding mechanisms, these changes may have significant consequences for scientific research, innovation and wildlife conservation partnerships.

Even where wildlife programs are not funded primarily through competitive grants like the Cooperative Fish and Wildlife Research Unit program, or where formula-based statutory apportionments such as Pittman–Robertson Wildlife Restoration funds may be less directly affected than discretionary assistance programs, indirect impacts will influence how efficiently available conservation funding can be deployed.

The Wildlife Society therefore urges OMB to ensure that the final rule preserves the scientific integrity, institutional stability and collaborative relationships that allow conservation to endure across sectors and across generations.

Relevant OMB Provisions: Overall effect of proposed rule and sections identified within these comments

The proposal would fundamentally revise government-wide regulations governing grants, cooperative agreements and other forms of federal financial assistance, including expanded oversight mechanisms, new merit-review requirements, enhanced termination authorities and revised cost principles. Such changes could result in major disruptions to institutions that rely on direct financial assistance from the federal government and inadvertently disadvantage collaborative projects that have historically produced meaningful contributions to the stewardship of fish, wildlife and their habitats.

Conclusion

Federal assistance programs represent a significant portion of the system through which the United States fulfills its conservation responsibilities. Their value lies not merely in distributing funds, but in sustaining the relationships, partnerships, scientific knowledge and institutional continuity upon which wildlife conservation depends.

The Wildlife Society therefore urges the Office of Management and Budget to revise the proposed rule to ensure that federal assistance remains:

- Stable across administrations;
- Grounded in scientific merit and statutory purpose;
- Accessible to tribes, states and conservation partners;
- Supportive of long-term ecological monitoring;
- Efficient to administer; and
- Consistent with the enduring needs of fish, wildlife and their habitats.

The health of the land depends not upon the priorities of a single season, but upon the steady accumulation of stewardship across generations.

As Aldo Leopold, a founding member of The Wildlife Society, observed: "To keep every cog and wheel is the first precaution of intelligent tinkering." The Wildlife Society respectfully encourages OMB to ensure that any revisions to federal financial assistance regulations preserve the scientific, institutional and collaborative foundations that make conservation possible.

References

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ⁱⁱ The Wildlife Society. Environmental Quality Through Resource Management. Available at: <https://wildlife.org/environmental-quality-through-resource-management/>

ⁱⁱⁱ The Wildlife Society. Incorporating Wildlife Needs in Land Management Plans. Available at: <https://wildlife.org/incorporating-wildlife-needs-in-land-management-plans/>

^{iv} The Wildlife Society. TWS Comments to CEQ on Recission of NEPA Implementing Regulations. Available at: <https://wildlife.org/tws-comments-to-ceq-on-rescission-of-nepa-implementing-regulations/>

^v The Wildlife Society. TWS Comments on ESA Regulatory Definition of Harm. Available at: <https://wildlife.org/tws-comments-on-esa-regulatory-definition-of-harm-2025/>

^{vi} The Wildlife Society. The Use of Science in Policy and Management Decisions. Available at: <https://wildlife.org/policy/position-statements/the-use-of-science-in-policy-and-management-decisions/>

^{vii} The Wildlife Society. Scientific Peer Review of Agency Decision Processes. Available at: <https://wildlife.org/scientific-peer-review-of-agency-decision-processes/>

^{viii} The Wildlife Society. Conservation Education. Available at: <https://wildlife.org/conservation-education/>

^{ix} The Wildlife Society. Workforce Diversity Within the Wildlife Profession. Available at: <https://wildlife.org/policy/position-statements/workforce-diversity-within-the-wildlife-profession/>

^x The Wildlife Society. The North American Model and the Future of Wildlife Conservation. Available at: <https://wildlife.org/the-north-american-model-and-the-future-of-wildlife-conservation/>

^{xi} The Wildlife Society. The U.S. Endangered Species Act. Available at: <https://wildlife.org/u-s-endangered-species-act-tws-issue-statement/>