

December 19, 2025

The Honorable Susan Collins Chair Committee on Appropriations U.S. Senate Washington, DC 20510

The Honorable Tom Cole Chairman Committee on Appropriations U.S. House of Representatives Washington, DC 20515 The Honorable Patty Murray Vice Chair Committee on Appropriations U.S. Senate Washington, DC 20510

The Honorable Rosa DeLauro Ranking Member Committee on Appropriations U.S. House of Representatives Washington, DC 20515

Dear Chair Collins, Vice Chair Murray, Chair Cole, and Ranking Member DeLauro:

On behalf of the Association of American Universities (AAU), a membership organization representing the nation's leading research universities, I write today to comment on the remaining nine appropriations bills currently under consideration in the United States House and Senate. AAU appreciates the committees' continued efforts to reach agreement on the outstanding FY26 bills. As negotiations continue, we ask that you ensure that the final measures prioritize robust investments in American science and education programs. We also urge you to retain policy provisions that promote the U.S. research enterprise and reject those that would impede American innovation and discovery.

Below, we outline provisions we support, and those we are concerned about, in the remaining FY26 appropriations bills.

Modifications to Indirect Cost Rates

AAU supports language included in several of the Senate and House appropriations bills that acknowledges the work of the Joint Associations Group (JAG) on Indirect Costs to develop a new model for determining indirect costs – the Financial Accountability in Research (FAIR) model – and which blocks federal agencies from otherwise implementing caps on facilities and administrative costs or altering current reimbursement methods.

As the appropriations bills move forward, we urge you to include language that codifies and implements the FAIR model across *all* federal research agencies. We also urge you to



maintain and strengthen language in several bills that would block attempts to arbitrarily cap indirect costs.

The FAIR model – developed by subject-matter experts from across the research community – provides an alternative indirect cost model that enhances transparency and accountability, provides greater visibility on the drivers of research costs, and ensures that research institutions are reasonably compensated for the essential costs required to perform research. Federal support for essential research costs is critical to promoting and protecting Americans' health, prosperity, and national security while maintaining our global leadership in innovation.

Labor-Health and Human Services-Education

AAU supports the FY26 Senate Labor-HHS-Ed funding levels for the **National Institutes of Health (NIH)**. The \$47.2 billion topline for the NIH proposed in the Senate bill allows the agency to continue funding critical biomedical research.

As the world's premier public funder of health research, the NIH plays an important role in our nation's international biomedical leadership. Robust annual growth in support of NIH research is vital not only to improving people's health but also to maintaining our competitiveness in the global economy. Investments in NIH research have led to critical advancements in cancer detection and treatment, diabetes treatment, and cardiovascular health. NIH research is also responsible for revolutionary developments in genomic medicine.

AAU greatly appreciates the House and the Senate for retaining the annual maximum **Pell Grant award of \$7,395** and for rejecting drastic cuts to the program proposed in the President's budget request. Robust funding is crucial for the program to continue its mission of making college accessible and affordable for low-income students.

AAU supports the funding levels for various programs within the **Department of Education** as proposed in the Senate FY26 bill. Specifically, we applaud the Senate for rejecting drastic cuts to programs such as the Federal Supplemental Educational Opportunity Grant (SEOG), Graduate Assistance in Areas of National Need (GAANN), international education programs, and the Institute of Education Sciences (IES).

Nearly all SEOG recipients are also Pell Grant recipients, and most SEOG recipients have a higher need on average than students who receive only Pell Grants. Additional financial assistance helps students access, afford, and achieve a postsecondary degree. The robust funding proposed in the Senate bill for the GAANN program will help ensure a strong pipeline of talented experts and educators who are able to meet the demands of an increasingly competitive economy.



International education programs play an integral role in developing the talent our nation needs to compete on the global stage; they also strengthen national security by creating deep expertise and cultural competency in world regions and languages of strategic interest to the United States. Graduates who have benefited from Title VI programs go on to successful careers in government, business, academia, and the military.

Rejecting the elimination of IES is imperative so that we do not lose the high-quality research that leads to teaching and learning innovations that offer tremendous returns for our society. We urge you to include the highest possible amount for the IES topline and to include funding amounts for individual IES authorities and programs in the bill's text. We appreciate the maintenance of the current funding level of \$793.1 million for the IES topline and of the funding levels for individual IES programs in the Senate bill. We were pleased to see the commitment to current funding levels for many of the IES budget line items in the House bill.

AAU appreciates that both House and Senate proposals allocate funds to the Institute of Museum and Library Services (IMLS) despite the substantial cuts proposed in the President's budget. IMLS is a significant source of funding and support for our nation's libraries. AAU strongly supports IMLS receiving funding in the amount of \$291.8 million, as included in both the House and Senate bills, to ensure continued support for the development and preservation of library collections archives, and museums as well as opportunities for research, learning, and civic engagement.

Provisions AAU Supports

AAU encourages you to retain <u>Section 224</u> of the Senate LHHS bill prohibiting modification of NIH indirect cost rates. This provision ensures that research institutions can continue partnering with the government to generate the vital breakthroughs essential to biomedical research.

AAU encourages you to retain <u>Section 239</u> of the Senate LHHS bill, which limits NIH's FY26 use of a multi-year funding mechanism to FY24 levels. NIH's FY25 increase in multi-year funding reduced the likelihood that new research ideas would be funded, potentially delaying future cures and therapies. Medical progress slows down when fewer new ideas are being pursued and funded. Across the agency, NIH awarded thousands of fewer grants in FY25 compared to FY24. The widespread use of multi-year funding also decreased the likelihood that early-career scientists and smaller labs would receive funding.

AAU encourages you to retain <u>Section 314</u> of the Senate LHHS bill, which requires the Department of Education to maintain staffing levels sufficient for fulfilling its statutory responsibilities. The significant reduction in ED staff has diminished the agency's capacity



to provide expert technical assistance to grantees and institutions regarding their grants, data collection, or discrete policy questions. Ensuring that ED can fulfill its statutory requirements will ensure that all institutional needs, and therefore student needs, are met in a timely manner.

Provisions AAU Opposes

AAU encourages you to reject <u>Section 312</u> of the Senate LHHS bill, which rescinds unspent funds from the Institute of Education Sciences. IES plays a vital role in advancing the field of education by conducting rigorous research and collecting education statistics.

This year, ED introduced the Admissions and Consumer Transparency Supplement (ACTS), a new data collection requirement that postsecondary institutions must meet. Institutions deserve an IES that provides helpful information as they work to comply with the additional data request. Moreover, IES serves as a starting point for scholars of education beginning their research on urgent education topics. If IES funds are rescinded, the customer service experience for institutions, scholars, and practitioners will continue to deteriorate even more than it has following the significant reduction in subject matter experts at the agency.

Commerce-Justice-Science

AAU supports the proposed funding level of \$9 billion for the **National Science Foundation (NSF)** in the Senate FY26 CJS bill.

The deep cuts to the NSF proposed in the President's budget request would cause our nation to fall behind our adversaries in advancing scientific and technological discoveries. The NSF is critical in ensuring that our innovation ecosystem is prepared to meet the key emerging technology needs of our national defense.

We also support language included in the Senate report guaranteeing level funding for the NSF's Social, Behavioral, and Economic Sciences (SBE) Directorate, which provides important funding to advance research in key areas such as human behavior and cognition, economics, ethical guidelines for artificial intelligence, and surveys that gauge the impact of federal investments on our nation's scientific research enterprise.

AAU supports the funding levels proposed for **NASA** in the Senate FY26 CJS bill. NASA plays a key role in advancing our understanding of space and Earth and inspiring future innovators.

Provisions AAU Supports



AAU encourages you to retain <u>Section 542</u> of the Senate CJS bill, which would prohibit modification of NASA and NSF indirect cost rates. This is critical to ensuring that research institutions can continue partnering with these key scientific agencies to conduct innovative research and generate vital breakthroughs.

Energy-Water

AAU supports a funding level of \$8.6 billion for the **Department of Energy Office of Science**. This level of funding would be consistent with the House mark and the use of \$250 million in prior year balances in the Senate mark.

The Office of Science is the largest funder of basic physical sciences in the world, advancing the frontiers of discovery through Nobel-worthy science and laying the groundwork for U.S. competitiveness in emerging technology. This modest increase from the FY25 funding level ensures our nation maintains its growth and position as the world's innovation leader.

AAU supports the proposed Senate funding level for **ARPA-E** of \$414 million. ARPA-E is a key source for transformational energy research on AAU campuses, especially in areas such as advanced batteries, power electronics, fission and fusion, and advanced materials. ARPA-E advances high-risk research and development (R&D) projects that are not yet ready for venture capital investment.

Since its founding, the agency has awarded over \$4 billion to more than 1,600 projects across nearly every state. These efforts have resulted in the creation of dozens of companies, hundreds of patents and technology licenses, more than \$14 billion in private follow-on investment, and \$22 billion in mergers, acquisitions, and initial public offerings.

AAU supports the proposed Senate funding level for **National Nuclear Security Administration Academic Programs** of \$115 million. We greatly appreciate the Senate for rejecting cuts to the program and proposing flat funding from FY25. NNSA Academic Programs are a small but vital component that allows the agency to fulfill its stewardship and modernization mission. The programs allow the agency to engage with the extramural STEM research community on AAU campuses through grants, internships, fellowships, academic centers, and other programming. This partnership allows NNSA to access world-class scientific expertise in areas such as predictive science, radiochemistry, and computation while creating career pathways for the next generation of a highly trained nuclear security workforce.

Provisions AAU Supports



AAU encourages you to retain <u>Section 301</u> and <u>Section 316</u>, which would protect research grants and funds from unwarranted cancellation or reallocation without congressional oversight.

AAU encourages you to retain <u>Section 315</u>, which would prohibit modification of DOE indirect cost rates. This is critical to ensuring that research institutions can continue partnering with the government to conduct innovative research and generate vital breakthroughs.

Defense

AAU commends the House and the Senate for providing robust funding for **Department of Defense Science and Technology (S&T) programs**. DOD basic research is foundational to future national security capabilities, including transformational breakthroughs with advanced application potential.

We urge you to adopt the House-proposed funding level for 6.1 basic research (\$2.48 billion) and the Senate-proposed funding levels for 6.2 applied research (\$6.5 billion) and 6.3 advanced technology development (\$10.2 billion). During this era of intensified threats to national security, it is imperative that the United States intensifies its commitment to defense research, development, and workforce training.

Provisions AAU Supports

AAU encourages you to retain <u>Section 8123</u> of the Senate Defense appropriations bill, which would prohibit modification of DOD indirect cost rates. This provision is critical to ensuring research institutions can continue partnering with the government to conduct innovative research and generate vital breakthroughs.

Interior-Environment

AAU greatly appreciates the House and the Senate for rejecting drastic cuts to the **National Endowment for the Humanities (NEH)** and the **National Endowment for the Arts (NEA)** as proposed in the President's budget request.

The NEH is the only federal agency that funds the entire range of academic fields in the humanities, including history, English, the study of language, and civics. For a nominal cost per American, NEH grants provide nationwide support of the humanities, which are fundamental to building an informed, well-rounded citizenry capable of addressing complex issues and participating in a modern democracy and a global economy.



For a similarly nominal cost, NEA provides grant opportunities, including Creative Forces: NEA Military Healing Arts Network, so that Americans in every state and district can reap the personal, cultural, economic, and educational benefits of engagement with the arts. AAU strongly supports the funding level of \$207 million for the NEH and NEA as proposed by the Senate.

Thank you for considering our views. As deliberations continue, I look forward to continuing to engage with you on the research and higher education funding priorities important to AAU and our member universities.

Sincerely,

Barbara R. Snyder, President

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