



QUINCY INSTITUTE
FOR RESPONSIBLE
STATECRAFT

Russell Vought
Director, US Office of Management and Budget
The White House

Re: Docket Number OMB–2026–0034, “Guidance governing federal grants and cooperative agreements”, Sections [200.220] [200.432]

Dear Director Vought:

The Quincy Institute (QI) is a foreign policy think tank founded in 2019 and dedicated to the principle of a more restrained, diplomacy-focused, and cooperative foreign policy.¹

As such, we have engaged in research and advocacy around issues of global scientific cooperation and specifically the potential gains from scientific cooperation between the U.S. and China. Our recent research has documented China’s move to the forefront of global scientific innovation over the 21st century, and the potential gains to long-term U.S. national scientific and innovative capacity that would be created through a rational system of maintaining scientific connections to China in areas that do not pose a significant threat to U.S. national security.² A recent editorial in *Science* magazine by Quincy-affiliated scholars argued for clear guidelines for research security in order to avoid security threats while still preserving potential gains from U.S.-China scientific collaboration.³

We are deeply concerned that Section 200.220 of this proposed regulation contains overly broad and vague restrictions on funding for international scientific collaboration that will force a near-complete decoupling between the U.S. and Chinese scientific communities. By creating a government-wide baseline prohibition on funding any scientific collaboration whatsoever between U.S. scientists and any entity “owned or controlled by” the Chinese government, any entity “acting on behalf of” China, or any entity “affiliated with” the Chinese military, Section 200.220 would cut off funding for contact between American academia and a huge swathe of Chinese academic and scientific organizations. These categories of affiliation are typically defined extremely broadly by U.S. analysts and would include effectively all leading Chinese research universities and academic institutions.

¹ See www.quincyinst.org

² See Caroline S. Wagner, “[China’s Historic Rise to the Top of the Scientific Ladder](#)”, Quincy Institute Policy Note #16, October 24, 2025; Denis Simon and Caroline Wagner, “[U.S.–China Scientific Collaboration at a Crossroads: Navigating Strategic Engagement in the Era of Scientific Nationalism](#)”, Quincy Institute Paper #18, November 4, 2025.

³ Caroline S. Wagner and Denis F. Simon, “[Research security policy needs clear guidelines](#)”, *Science* Magazine, Volume 391 Issue 6791, p. 1187, March 19, 2025.

While this blanket prohibition could technically be overruled by an agency head through an express determination that the specific research collaboration does not pose a risk to U.S. national security and is in the U.S. interest, such determinations are likely to be extremely difficult to obtain for both practical and political reasons. Realistically, U.S. scientists will take the blanket ban on Federal funding for U.S.-Chinese scientific collaboration as a strong signal that they should never seek or plan for such collaboration.

The justifications given in the proposal for imposing the broad prohibition in Section 200.220 are extremely inadequate. The proposed regulation cites the Wolf Amendment, a statutory prohibition on collaboration between the National Aeronautics and Space Administration (NASA) and China or Chinese companies. But a statutory prohibition on cooperation between one U.S. government technical agency and Chinese entities hardly requires a far broader regulatory prohibition on U.S. government funding for U.S.-China scientific collaboration for any scientific research whatsoever.

The proposal also cites a generalized concern with U.S. national security interests as a justification for the prohibition. Yet the proposal does not provide any detailed justification for the claim that a blanket ban on support for U.S.-China scientific cooperation would serve U.S. national interests. Such a ban would have several effects that would tend to undermine U.S. interests, including national security interests:

- 1) The ban would end scientific cooperation in areas that are not crucial to national security but serve U.S. national interests more generally, such as health research, clean energy research, and certain types of basic scientific research. As China is now becoming a global research and innovation leader across a wide range of areas, this would undermine U.S. scientific advances in these areas.
- 2) The ban would reduce the visibility the U.S. and U.S. scientists have into Chinese scientific innovation, leading to less understanding of Chinese scientific and technical capacities. This would have a harmful impact on national security in the long run.
- 3) The ban could cause leading scientists to choose to make their careers in other countries besides the United States where international scientific collaboration was easier, possibly including China. Recent moves by scientists to leave the U.S. for China are already showing a “reverse brain drain” effect which will almost certainly be accelerated by this proposal.⁴ Again, this is likely to do long-run harm to U.S. national security interests.

Most generally, the proposal appears to seek to segregate the U.S. scientific community from the Chinese scientific community in a way that deeply misunderstands the fundamentally international and collaborative nature of modern science. The seminal work of the leading social

⁴ See e.g. South China Morning Post, “[10 scientists and experts who have left the US and UK for China so far in 2026](#)”, July 10, 2026.

scientist Caroline Wagner has demonstrated that impact and innovation in modern science is profoundly dependent on participation in global scientific networks and collaboration with scientists in other countries, especially countries which are part of the connected “core” of global scientific innovation.⁵ There is no question that China is now a leading part of this global scientific core. An effort to place overly broad security restrictions on scientific collaboration is therefore a trap which will backfire by harming American scientific capacity in the long run.⁶

In light of these concerns, we propose that Section 200.220 be withdrawn from the current proposal. Should OMB or other Federal government agencies wish to re-examine funding for U.S.-China scientific collaboration, we suggest that the proposed approach of a blanket ban on all funding be replaced by a much clearer and more precisely targeted approach that restricts funding for specified areas of high national security concern while continuing to permit funding for areas that are likely to serve long-run U.S. national interests in maximizing U.S. scientific and innovation capacity. The Quincy Institute has laid out guidance for such an approach, which we call “smart openness”, in several recent pieces of research, which we encourage OMB to consider.⁷

In addition to Section 200.220, we are also concerned that Section 200.432 of the proposal would cut off funding for attendance at international scientific conferences without express Federal government approval. This is another move that will reduce the visibility the U.S. has into Chinese scientific innovation, cut off U.S. scientists from the international scientific community, and discourage scientists from making their career in U.S. institutions. We also urge that this section be reconsidered and either removed or significantly limited in its scope.

Thank you for your consideration of these comments. Should you have questions or wish further information on our views, you may contact Marcus Stanley, QI’s Director of Studies, at marcus@quincyinst.org or 202-674-9885.

Sincerely,

Quincy Institute for Responsible Statecraft

⁵ Wagner, Caroline, [The Collaborative Era in Science: Governing the Network](#), Palgrave Macmillan, 2018; Wagner CS, Whetsell T, Baas J and Jonkers K (2018) “[Openness and Impact of Leading Scientific Countries](#).” *Front. Res. Metr. Anal.* 3:10. doi: 10.3389/frma.2018.00010

⁶ Tommy Shih and Caroline S. Wagner, “[The Trap of Securitizing Science](#)”, *Issues in Science and Technology*, Vol. XLI, No. 1, Fall 2024.

⁷ For specific recommendations on classifying “red”, “yellow”, and “green” areas for scientific collaboration, see Caroline S. Wagner and Denis Simon, “[Community Guidelines for Smart Openness In US Research Collaboration](#)”, Quincy Brief #96, April 13, 2026. For a broader overview see Denis Simon and Caroline Wagner, “[U.S.–China Scientific Collaboration at a Crossroads: Navigating Strategic Engagement in the Era of Scientific Nationalism](#)”, Quincy Institute Paper #18, November 4, 2025.