

AMERICAN MEDICAL ASSOCIATION RESIDENT AND FELLOW SECTION

Late Resolution: 1
(I-26)

Introduced by: Dayna Isaacs, MD, MPH, Leanna Knight, MD, Ashley Glass, DO, MA, Frank Zhou, MD

Subject: Protecting the Integrity of Public Participation in Federal Health Policymaking

Referred to: Reference Committee (Assigned by HOD)

Whereas, transparent, accountable, and apolitical public comment processes are essential to meaningful public participation and democratic governance¹; and

Whereas, public comment processes provide physicians, patients, researchers, medical organizations, community leaders, and other stakeholders a critical opportunity to contribute evidence, expertise, and lived experience to the development of federal health policy¹; and

Whereas, federal policies governing health care, biomedical research, public health, medical education, and the physician workforce can profoundly affect patient outcomes, scientific progress, access to care, and physician practice²; and

Whereas, legitimate and lawful reasons may exist to redact protected information, withhold impermissible content, or consolidate duplicate comments, including to protect privacy and confidentiality as well as address threats, spam, unlawful content, or copyright restrictions³; and

Whereas, in August 2026, 42 public comments concerning a proposed Office of Management and Budget (OMB) overhaul of federal grantmaking were reported to have been removed from public display on Regulations.gov after initially being posted, without a publicly stated explanation for their removal, raising questions regarding transparency, accountability, and the integrity of the federal public comment process⁴⁻⁵; and

Whereas, at least 10 of the removed comments reportedly referenced that the daughter of OMB Director Russell Vought, who has cystic fibrosis, had benefited from Trikafta, a therapy whose development was supported in part by federally funded biomedical research⁴; and

Whereas, our AMA has existing policy addressing political interference in scientific peer review (D-460.956) but lacks policy establishing standards for transparency, preservation, and auditability of public comments in federal health-related policymaking; therefore be it

RESOLVED, that our American Medical Association (AMA) support transparent, viewpoint-neutral standards for publication, redaction, withholding, and removal of public comments in federal health policymaking; and be it further

RESOLVED, that our AMA advocate that federal agencies publicly document the basis for removing, withholding, or redacting public comments and preserve an auditable record of such actions, consistent with applicable privacy, safety, and legal protections; and be it further

RESOLVED, that this resolution be immediately forwarded to the AMA House of Delegates at the 2026 Interim Meeting.

Fiscal Note: Moderate

References

1. Stinson, N. (2025, November 18). *What are public comment periods, and why should you know about them?* Legal Defense Fund. <https://www.naacpldf.org/what-are-public-comment-periods-and-why-should-you-know-about-them/>
2. HHS. What Is a Rule? U.S. Department of Health and Human Services. <https://www.hhs.gov/regulations/what-is-a-rule/index.html>
3. U.S. Department of Education. Federal Register Notice, document 2025-18640. <https://public-inspection.federalregister.gov/2025-18640.pdf>
4. Oza A. Comments on OMB research rule mysteriously removed from federal website. STAT. Published August 25, 2026. Accessed September 9, 2026. <https://www.statnews.com/2026/08/25/russell-vought-omb-funding-comments-daughter-benefited-nih-research/>
5. U.S. Government Accountability Office. Federal Rulemaking: Information on Selected Agencies' Management of Public Comments. GAO-20-383R. Published April 16, 2020. Accessed September 9, 2026.

RELEVANT AMA POLICY

OMB Proposed Rule: Regulation for Federal Financial Assistance D-460.956

1. Our American Medical Association expresses its strong support for the scientific peer review process, academic journal independence and the immense value of merit-based scientific investments unimpeded by political interference.
2. Our AMA will submit comments during the public comment period expressing our strong concerns with the proposed rule titled "Regulation for Federal Financial Assistance" (91 Federal Register 32198) issued on May 29, 2026.
3. Our AMA will consider taking legal action to challenge implementation of the proposed Office of Management and Budget (OMB) rule titled "Regulation for Federal Financial Assistance" (91 Federal Register 32198) issued on May 29, 2026.

[Res. 254, A-26]

Supporting the Health of Our Democracy H-65.936

1. Our American Medical Association supports policies that ensure safe and equitable access to voting and opposes the institutional barriers to the process of voter registration.
2. Our AMA encourages physicians and medical trainees to vote, eliminate barriers to their participation in the electoral process, and support their and other healthcare workers' engagement in all voter registration efforts in healthcare settings, including emergency absentee ballot procedures for qualifying patients, visitors, and healthcare workers.
3. Our AMA supports the use of independent, nonpartisan commissions to draw districts for both federal and state elections.

[Res. 019, A-24]