Center on Budget and Policy Priorities

1275 First Street NE, Suite 1200
Washington, DC 20002

Tel: 202-408-1080
Fax: 202-408-1056

info@cbpp.org
www.cbpp.org

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DOGE Interference in Federal Grantmaking Adds Burden, Uncertainty, and Risk

By Cristin Dorgelo[1] and Jacob Leibenluft[2]

Federal grantmaking processes are designed to be open, fair, reliable, and free of political influence, favoritism, or retaliation. The Trump Administration and its so-called Department of Government Efficiency (DOGE), led by Elon Musk, are interfering at every stage of these processes across all grantmaking agencies. As a result, federal grantmaking is becoming less efficient, more uncertain, more political, and more open to corruption. Grantees are experiencing slowdowns in the delivery of appropriated funds and may be illegally denied funding altogether.

Two recent developments illustrate the ongoing interference and risks to federal grantmaking:

- DOGE employees have taken control of Grants.gov, according to an April 11 Washington Post report.[3] Grants.gov is the central public clearinghouse for competitive opportunities for more than 1,000 programs across 26 agencies.[4] DOGE employees have reportedly barred civil servants from posting Notices of Funding Opportunities (NOFOs) to Grants.gov, instead adding a new requirement that NOFOs be reviewed and posted by DOGE.
- Through their so-called "Defend the Spend" initiative, DOGE is adding new layers to systems that handle payment-request collection, reviews, and approvals for routine grant payments, causing delays and adding burdensome new reporting requirements for grantees.[5] DOGE is now reviewing payments processed through the Payment Management Services (PMS) system.[6] In fiscal year 2024, PMS processed nearly 500,000 payments from more than 15 agencies totaling over $853 billion to thousands of organizations, representing 70 percent of federal grant disbursements.[7]

In addition, some agencies with embedded DOGE personnel are making concerning changes to grant review criteria, adding troubling new grant terms and conditions, attempting to claw back previously distributed grant funds, using threats of grant cancellations to coerce specific grantees, and otherwise disrupting grantmaking activities.[8]

This analysis summarizes the impact of federal grants across the country, describes the current risks to federal grantmaking, and details how DOGE and the Administration are interfering at each stage of the long-standing grantmaking process. (See Table 1.)

Federal Grants Provide Essential Support in Every State

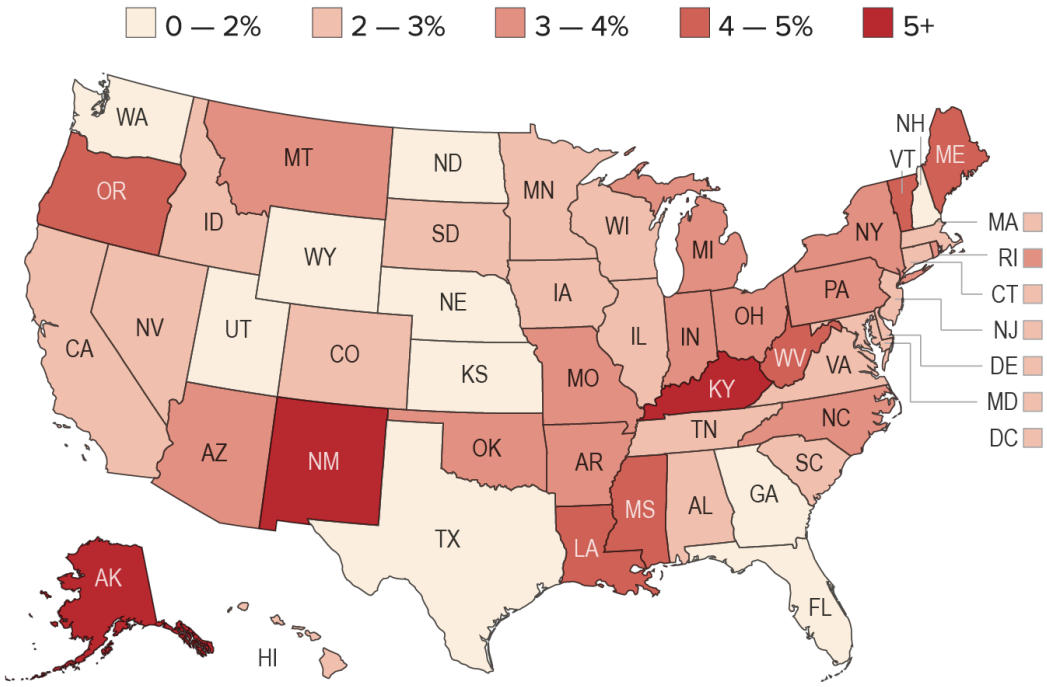
Federal grants are an essential source of support to state and local governments, nonprofits, and education and research institutions nationwide. (See Figure 1.) Over the last decade, federal agencies have obligated an average of approximately $900 billion annually through grant transactions, and sometimes much more, such as during the response to the COVID-19 pandemic.[9]

FIGURE 1

Federal Grants Are an Important Part of State Economies

Percent of 2024 state GDP represented by fiscal year 2024 new grant awards from the Department of Health and Human Services (HHS)

This snapshot of the geographic distribution of new grant awards in fiscal year 2024 from the Department of Health and Human Services (HHS), the largest grantmaking federal agency, is one example of how federal grantmaking supports state economies more broadly.



Sources: Fiscal Year 2024 Department of Health and Human Services Grants by Location Sourced from the HHS Tracking Accountability in Government Grants System (TAGGS) Database (https://taggs.hhs.gov/ReportsLocation/GrantsbyLocationIndex); Preliminary Calendar Year 2024 Gross Domestic Product by State Sourced from Bureau of Economic Analysis (https://www.bea.gov/data/gdp/gdp-state); and Calendar Year 2024 State Population Estimates Sourced from the Census Bureau (https://www.census.gov/data/tables/time-series/demo/popest/2020s-state-total.html).

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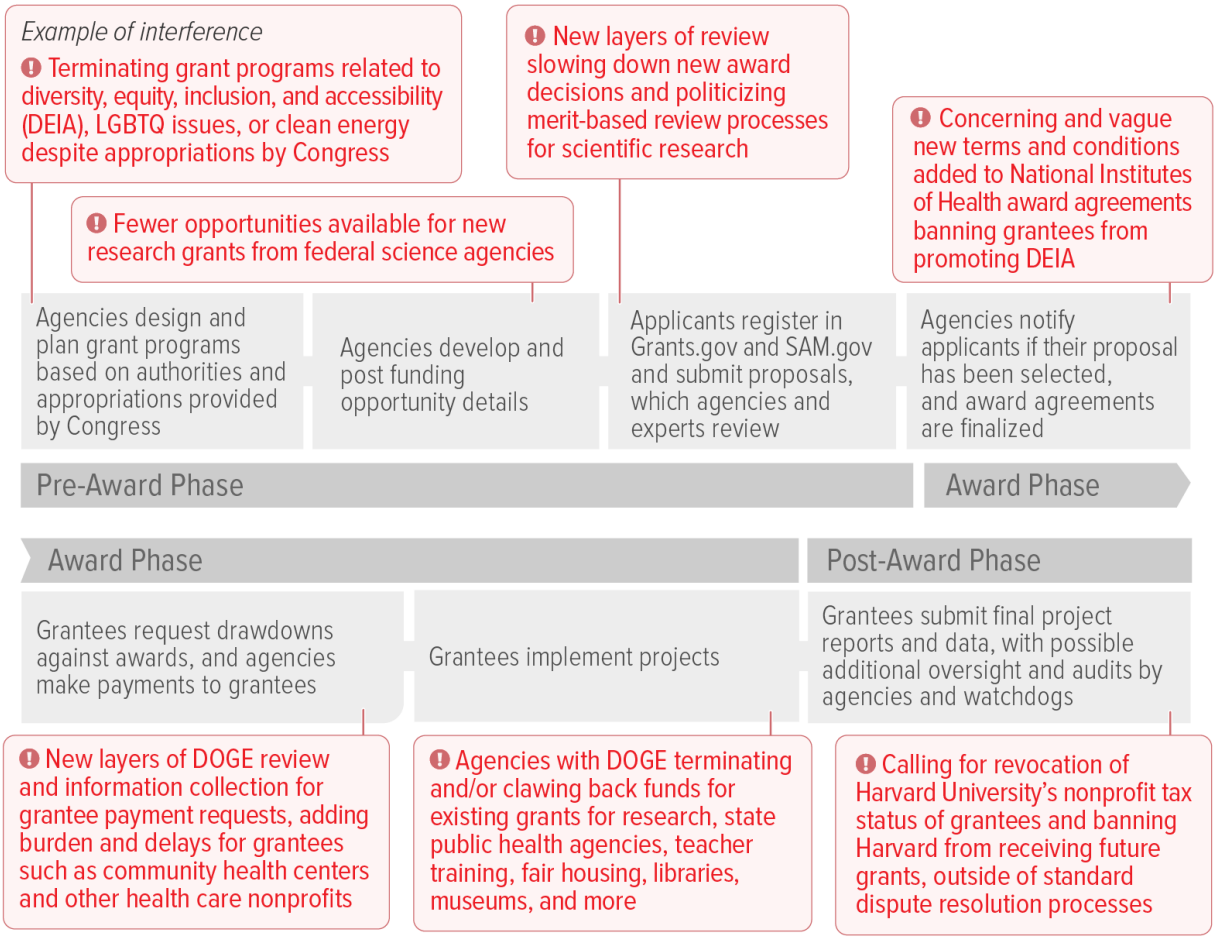
- Most of these grants — an average of more than $700 billion in transactions annually — go to state and local governments through **formula and block grants** for purposes such as law enforcement, education, and social services.[10]

- An average of approximately $130 billion annually flows through **competitive grants** that fund specific projects, such as research and infrastructure.[11]
- Nearly $50 billion goes to grantees on average each year through **cooperative agreements** with federal agencies to collaborate in such areas as public health emergency preparedness and support for farmers.[12]

FIGURE 2

Trump Administration and DOGE Are Interfering at Every Stage of Federal Grantmaking

Grantees are experiencing delays in grant payments and new award decisions, cancellations of existing grants, and fewer opportunities for new grants



Note: For additional types and examples of Trump Administration/DOGE interference at every stage of the grantmaking process, see CBPP, "DOGE Interference in Federal Grantmaking Adds Burden, Uncertainty, and Risk."

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Risks to Federal Grantmaking

Actions like DOGE reviewing Grants.gov funding notices or routine grant payments through the PMS system are alarming. At a minimum, they introduce unnecessary delays and uncertainty to the

grantmaking process. At worst, they offer an opportunity for unprecedented political interference. Delays stemming from DOGE review could also become illegal impoundments if they prevent congressionally appropriated funds from being spent by the statutory deadline for a given program.[13]

The interference is occurring in part through the insertion of DOGE employees into agency roles and systems that have typically been handled by, or even restricted to, well-trained and deeply experienced non-partisan agency officials versed in the relevant laws and regulations.[14] This is particularly disturbing because of concerning reports about the vetting, conduct, conflicts of interest, and lack of clear management and oversight of DOGE staff, raising questions about whether they are trustworthy and acting in the public interest.[15]

The Administration has moved to cancel existing grants over policy disagreements with certain grantees — even where those awards are unrelated to the area of disagreement — and is attempting to coerce those grantees by demanding compliance with new conditions on federal grant funding outside of applicable grant agreements.[16] In some cases, the Administration has altogether circumvented the processes for dispute resolution with specific grantees.

It is this type of political interference — of dubious statutory authority — that the federal grants system is designed to prevent. (See Figure 2.)

Grantmaking Is Getting Less Efficient and Reliable for Grantees

Grants processes do have significant opportunities for greater efficiency and effectiveness. During the Biden Administration, there were efforts to streamline federal financial assistance and reduce burdens on grantees, for example by streamlining the uniform guidance that governs grants, reducing the complexity of funding notices, and working with inspectors general to combat fraud and mitigate risk factors for improper payments.[17] More certainly could be done to improve federal grantmaking.

However, the actions by DOGE and the Trump Administration go in the opposite direction, creating new burdens on grantees and distracting them from delivering valuable services and outcomes for the public, without addressing actual waste, fraud, or abuse.

Viewed in combination, these actions add burden and a high degree of uncertainty to projects funded by federal grants. The resulting delays, award terminations, changing terms and conditions, and targeted demands related to grants are raising concerns about some grantee organizations' capacity to sustain their staffs and infrastructure.[18]

TABLE 1

Interference at Every Stage of the Federal Grants Lifecycle

This table follows the stages of the grantmaking lifecycle, from pre-award to post-award. It provides an explanation of each phase, describes the types of interference by the Trump Administration and DOGE, and offers specific examples.

Grant Lifecycle Stage	Type of Interference by Trump Administration/DOGE	Examples
Pre-Award Phase		
Grant program design and planning: Agencies develop and plan grant programs based on the authorities and appropriations provided by Congress. Appropriations and authorities for grant-making programs are set forth in law and informed by the President's budget requests. The public informs federal funding priorities and grant-making approaches through a variety of means, from voting for elected officials, to advocating to the legislative and executive branch, to participating in executive branch requests for information and public comment, to joining federal advisory committees.	• Terminating certain programs not aligned with administration priorities, despite appropriations by Congress. • Prohibiting development and implementation of grants programs and activities related to certain topics (DEI, LGBTQ, etc.). • Terminating advisory committees that offer impartial scientific guidance that provides an essential foundation for agency grantmaking programs, a basis for selection of grantees, and reviews of the effectiveness of prior grantmaking.	• Executive Order 14151 has led to termination of programs and activities related to diversity, equity, and accessibility. • Executive Order 14168 directs agencies to assess grant conditions and ensure grant funds do not promote "gender ideology." • The National Science Foundation (NSF) terminated 12 of its scientific advisory committees on April 15. Additional science agencies are also moving to terminate advisory committees and remove and replace committee members. • President Trump's budget request for fiscal year 2026 proposes eliminating or cutting agencies and programs that provide billions annually through grants such as for research, education, clean energy, and fair housing.
Opportunity posting: Agencies develop and publicly post NOFOs on Grants.gov. NOFOs provide the details of open grant or cooperative agreement funding competitions so organizations can assess their eligibility, relevant competencies, and interest in applying. NOFOs include the criteria that will be used for selecting projects for awards, as well as the terms and requirements to which selected grantees will need to agree. In addition to posting NOFOs for grants on Grants.gov, agencies also post brief financial assistance listings for each grant program on SAM.gov, which are detailed public descriptions of every federal program that provides financial assistance of any type (including grants and also loans, scholarships, insurance, and other types of assistance).	• Adding new political layers for review and revision of NOFOs supported by DOGE access to grants systems. • Posting fewer new NOFOs at some agencies. • Pulling down existing NOFOs to effectively terminate grant programs. • Reducing the quantity of available awards under certain NOFOs. • Adding new terms and conditions to NOFOs.	• DOGE reportedly has taken control of Grants.gov and is reviewing all NOFOs prior to posting on Grants.gov. Grants.gov hosts NOFOs for more than 1,000 programs across 26 agencies. • As of May 27, no NOFOs have been posted by the Department of Health and Human Services (HHS) operating divisions since March 19. • DOGE is reportedly reviewing all NOFOs from the National Institutes of Health (NIH), interfering in NIH's scientific independence and causing a backlog of unposted NIH NOFOs for research grants. The journal Science reported that "NIH only published three NOFOs between 20 January and 26 March, compared with 163 in 2023 and 147 in 2024 between the same dates" and that, as of March 26, NIH had "already pulled offline at least 97 existing NOFOs that related to health disparities, workforce diversity, and research with sexual and gender minorities."

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		• NSF cut available Graduate Research Fellowship Program awards by 50 percent, leading to about 1,000 fewer fellowships than usual and the lowest number in 15 years.
Application registration, proposal submission, and proposal review: Organizations interested in applying for a grant first register on SAM.gov and get a Unique Entity Identifier by providing their contact and business information. Then they register on Grants.gov to proceed with applying for a grant. Applicants then submit applications/proposals following the process identified in the NOFO. Federal civil servants review the applications/proposals and make award recommendations to civil servants in agency leadership based on the programmatic and financial reviews of the applications. Sometimes, external reviewers participate in the review process, such as through merit-based peer review for science and research programs at agencies like NSF and NIH. Informed by the recommendations of internal and external reviewers, final award decisions are then made by federal agency staff with fiduciary responsibility and legal authority to enter binding agreements on behalf of the agency.	• Delaying grant review panels for peer review processes. • Delaying grant decision-making, including due to increased layers of review facilitated by DOGE access to key grants systems. • Changing peer review processes in ways that at best narrow the number of experts involved in review of scientific proposals and at worst introduce political bias. • Recommending fewer grants for approval. • Blocking specific grantees from eligibility for new grants.	• With the participation of a DOGE team embedded at the agency, NSF has frozen new awards multiple times since late January and delayed all grant review panels. • NSF has added new layers of screening for proposals, politicizing its longstanding merit-based review process and delaying award decisions. It has also made significant updates to how it is implementing one of its two statutory criteria for review and selection of grants — the "Broader Impacts" criterion, through which proposal reviewers consider the likely societal impact of the research project. • NIH announced plans to eliminate institute-run peer review panels and instead centralize peer-review processes.
Award Phase		
Notification of award and signing of award agreements: Agency program managers notify applicants if they have or have not been selected for an award. Agencies and grantees then finalize and execute award agreements.	• Making fewer than usual grant awards at some agencies. • Adding new terms and conditions to new award agreements.	• There has reportedly been a 50 percent reduction (equivalent to more than $400 million) in new NSF research awards since Trump took office, compared to the same period in fiscal year 2024. In a normal year, only 20 to 30 percent of eligible NSF applications are successful, leaving many viable research projects unfunded. • On April 21, NIH provided notice of a new term and condition that will be added to all new, renewal, supplement, or continuation awards (grants, cooperative agreements, other transactions) requiring awardees to certify that they do not operate DEI programs and do not engage in "discriminatory prohibited boycotts" of companies doing business in Israel.

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Payments to grantees: Agencies make payments to grantees based on award agreement terms. Commonly, funds are set aside for awarded grants, and grantees request drawdowns on a periodic or as needed basis to cover direct and indirect project expenses. Agreement terms might provide for initial or as-needed advance payments, milestone-based payments tied to project stages, incremental advance payments according to a set schedule, or reimbursements for past incurred expenses. Seventy percent of federal grants payments are processed through the Payment Management Services (PMS) system, a government-wide shared service run by the HHS Program Support Center. In 2024, PMS processed nearly 500,000 payments from more than 15 agencies totaling over $853 billion to nearly 2,500 organizations. Agency program officers receive, approve, and submit payment requests to a payment system like PMS, which transmits approved payments to either the Federal Reserve Bank or the U.S. Treasury for deposit into the grantee's bank account, and records payment transactions and corresponding disbursements to the appropriate accounts.	• Centralizing information collection by DOGE regarding routine payments on top of existing grants-payment systems. • Increasing layers of review by DOGE and agencies for new payments under existing grant agreements. • Not making routine payments. • Attempting to claw back funds already distributed and/or spent by grantees.	• Agencies implemented a temporary freeze on all financial aid disbursements to facilitate review of grants for compliance with executive orders, directed by OMB (since rescinded). • Executive Order 14154 paused disbursement of funds appropriated through the Inflation Reduction Act of 2022 (P.L. 117-169) or the Bipartisan Infrastructure Law (P.L. 117-58). In response to this executive order, agencies have, for example, frozen funds to more than 22 tribal nations and attempted to claw back more than $20 billion in already distributed funds for clean energy and climate projects. • DOGE staff reportedly have administrator access and modifications to the government-wide PMS system run by HHS. This includes new information collection from grantees and layers of review of payments, causing delays and adding burden for grantees. • According to court filings, multiple DOGE representatives have access to the HHS Healthcare Integrated General Ledger Accounting System (HIGLAS), which is used by the Centers for Medicare and Medicaid Services to make and track Medicare payments to states. At least one DOGE representative reportedly may not have received proper security training for access to this system. • A DOGE staffer reportedly attempted to de-obligate grant funds in FEMA's grant management and payments systems. Department of Homeland Security (DHS) leaders fired FEMA's CFO and other career staff for making allowable grant payments of appropriated program funds, following pressure from Elon Musk and DOGE. DHS also clawed back the funds in question from New York City's bank accounts. These actions are in addition to the Administration's efforts to claw back awarded but unobligated FEMA grants to state preparedness agencies dating back to 2020 via the Building Resilient Infrastructure and Communities (BRIC) program. • The Department of Education (ED) has cancelled extensions previously provided to states to spend billions in funding from the Elementary and Secondary School Emergency Relief (ESSER) grant program. Not making promised reimbursements to states and

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		districts that have already expended funds for facility improvements and student programming may lead to layoffs at schools. improvements and student programming may lead to layoffs at schools. • The Department of Agriculture has paused payments for food banks through the Emergency Food Assistance Program, after terminating two other programs supporting food bank collaborations with local farmers. • There has reportedly been a 42 percent reduction (nearly $1 billion) in Head Start grant payments to preschools from January 1 to April 15, 2025, compared to the same period in 2024.

Project implementation and reporting: Grantees implement projects. Typically, grantees have a high degree of certainty that the terms and conditions of their grant agreements will be honored by the federal government. This is usually a phase for grants in which the grantee is active and the federal government is less active, other than reviewing progress reports and providing standard oversight, as discussed further below. (In the case of cooperative agreements, the agency that is a party to the cooperative agreement remains active in project implementation, to the extent specified in the cooperative agreement.)
 	
Grantees satisfy administrative, financial, and programmatic data and reporting requirements. Grantees and program managers at grantmaking agencies interact with many federal grant systems during project implementation to track and satisfy these requirements. For example, grantees submit required reports, primarily through SAM.gov, including subaward reports. Grantmaking agencies submit data about awards and subawards to USAspending.gov.
	• Reviewing, terminating, and/or modifying existing grants assessed to be out of alignment with Administration priorities.
	• Terminating grants to reduce overall spending.
	• Terminating grants to punish grantee organizations over political or policy disagreements, even if the grant topic is unrelated to the topic of disagreement.
	• Placing new terms, conditions, and requirements on existing grantees, either through renegotiation of existing agreements or outside of awards agreements.
		• Executive Order 14222 directs agencies to work with DOGE to review existing grants and then terminate grants or modify grant agreement terms to reduce spending or reallocate spending to advance Administration priorities.
		• Multiple agencies with DOGE have cancelled existing awards in response to executive orders and as part of agency and program dismantling, in including:
		  ○ more than 1,000 existing awards at HHS, including many NIH research awards, as well as more than $12 billion in cancelled grants to state public health agencies;
		  ○ more than $360 million in existing research and other grants at the Department of Defense;
		  ○ ED grants, including cancellation of more than 140 teacher-training grants and as well as cancellation of $1 billion in previously awarded grants for schools to hire mental health staff;
		  ○ most existing grants from the U.S. Agency for International Development;
		  ○ HUD grants, including to organizations that help enforce fair housing laws;
		  ○ Environmental Protection Agency (EPA) grants, including awards supporting environmental justice and research awards studying local air pollution and toxic chemicals;

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		○ Department of Justice (DOJ) grants, including more than 350 grants for more than $800 million in funding for projects such as helping people with disabilities navigate the justice system or addressing elder abuse; ○ Department of Transportation (DOT) research grants, including more than $50 million in grants to universities to study equity and access issues in transportation systems; ○ at least dozens of terminated awards to libraries and museums through the Institute for Museum and Library Services (IMLS); ○ over 1,400 awards for arts and cultural groups from the National Endowment for the Humanities (NEH), as well as dozens of additional arts and culture grants from the National Endowment for the Arts (NEA); and ○ more than 1,400 NSF research grants. ● Existing awards from multiple agencies to multiple specific universities have been targeted for cancellation, including terminated grants for projects unrelated to areas of political or policy disagreement. ● Cuts of allowable indirect costs to 15 percent for research awards have been made by NIH, the Department of Energy (DOE), and NSF, including for existing awards, threatening the ability of universities and other research institutions to sustain necessary staff and infrastructure. ● The Department of Commerce (DOC) is planning to open CHIPS grant agreements for renegotiation of terms and conditions.
Post-Award Phase		
Project closeout, oversight, and auditing: Grantees submit final project reports as required by their grant agreements. Grantees submit any federally funded data and publications to designated open repositories like the NIH PubMed and NSF's Public Access Repository. Entities that spend $1 million or more in federal grants funds annually submit single or program-specific audits to the Federal Audit Clearinghouse. Agencies, Inspectors General, or GAO	● Calling for revocation of nonprofit tax status of grantees based on past areas of work. ● Making changes to audit and performance review processes.	● The Administration has made threats to revoke Harvard University's nonprofit tax status and has notified the university that it is banned from receiving federal grants in the future. ● DOGE reportedly attempted to embed a team at the Vera Institute of Justice, a 501(c)(3) nonprofit organization.

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may conduct or require additional audits based on their authorities.	• Requesting documents and records from grantees beyond those required by grant agreements. • Attempting to embed a DOGE team into a nonprofit organization for review and audit purposes. • "Blacklisting" specific grantees by banning them from receiving for future grants	• Women and Black and Hispanic people have been fired from NIH review boards through which peers look at performance of principal investigators across multiple awards. • Limited standard oversight appears to be occurring given ousted inspectors general and other watchdogs.

[1] Cristin Dorgelo served as Senior Advisor for Management in the Office of Management and Budget during the Biden Administration. Previously, she served as the Chief of Staff and as Assistant Director for Grand Challenges in the Office of Science and Technology Policy during the Obama Administration.

[2] Jacob Leibenluft most recently served as Executive Associate Director of the Office of Management and Budget during the Biden Administration. Prior to that, he served in senior roles at the Department of the Treasury under Secretary Janet Yellen and at the National Economic Council in the Obama White House.

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