

June 12, 2026

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

Re: OMB guidance governing federal grants and cooperative agreements
Regulation Codifying Policies on Federal Financial Assistance, Revisions to 2 CFR
91 Fed. Reg. 32198 (May 29, 2026)
Extension of Comment Period to August 27, 2026

Dear Director Vought:

The undersigned associations, science societies, and other groups (will be revised based on signatories) come to you jointly to ask for a 45-day extension to the comment period for the proposed rule by the Office of Management and Budget to revise Title 2 of the Code of Federal Regulations, published on May 29, 2026. Presently, comments are due July 13, 2026 and we ask that on or before June 30, 2026 a Federal Register Notice is published extending the comment period to August 27, 2026.

The scope and impact of OMB's proposed rule is vast. The proposed rule amends 91 parts of Title 2 of the Code of Federal Regulations across 456 different sections of the regulations, adding 52 new subsections and fully restating 375 sections. The rule will impact the entirety of government grant-making across the United States. OMB itself says the revisions suggested would relate to over \$179 billion of funds to small entities. In addition to these entities, NSF reports that [\\$64 billion](#) was spent in FY2024 at universities on R&D, much of it through grants and cooperative agreements. NIH allocated approximately [\\$36.9 billion](#) in extramural funding that same fiscal year. These are just examples of the small but important components of the approximately [\\$1.2 trillion](#) that the federal government spends via grants and cooperative agreements.¹ A 45-day comment period is insufficient to allow completion of the multi-disciplinary analysis needed to provide useful feedback to OMB.

A 90-day period is warranted because this rule is complex and wide-ranging *and* never appeared on the Unified Agenda as a regulatory action being undertaken by OMB. The fact that no one in the regulated community was aware OMB was pursuing notice and comment rulemaking is evidenced in the fact that not one EO 12866 meeting was requested during the period this rule was under review at OMB's Office of Information and Regulatory Affairs.

¹ Parts of the proposed rule do not apply to the full \$1.2 trillion in federal grant spending because there are exceptions for awards such as block grants, awards based on a statutory formula, and disaster-recovery grants, among other types of assistance.

Joint letter from xxx multi-sector organizations
Request for 90-day comment period (45-day extension)
June 12, 2026

Submission of substantive comments is fundamental to the rulemaking process under the Administrative Procedure Act, which at its core is about enhancing public engagement in rulemaking for the purpose of ensuring agencies receive the most comprehensive information possible to solve problems for the American people.² A fulsome and rational consideration of and response to data and evidence presented in public comments enables agencies to benefit when “situated knowledge” is shared as part of rulemaking efforts; in other words, public officials benefit from having access to knowledge that is widely dispersed among stakeholders.³ “In particular, agencies need information from the industries they regulate, other experts, and citizens with situated knowledge of the field in order to understand the problems they seek to address, the potential regulatory solutions, their attendant costs, and the likelihood of achieving satisfactory compliance.”⁴

Many of us actively take steps as organizations or through our members to ensure the United States has the capacity to engage in ongoing and vital efforts to make progress in critical sectors as well as emerging fields. Many of us have worked with successive administrations and Congress on issues essential to the nation’s housing, energy, transportation, infrastructure, research and development, and healthcare systems, among others, that are regularly subject to federal grantmaking and cooperative agreements. Despite differences in approach, sector, and membership, each signatory has found it core to our mission to enhance the American innovation enterprise.

Executive Order 12866 states that agencies should “afford the public a meaningful opportunity to comment on any proposed regulation.” OMB envisions the proposed revisions of Title 2 of the Code of Federal Regulations will be a far-reaching reimagining of all forms of federal financial assistance. For a rule with these intended sweeping and comprehensive effects, a period of at least 90 days is needed in order for the comment period to be meaningful.

We value the opportunity to participate in the rulemaking and policy implementation process on the issues framed in the proposed rule, about which we care deeply, and appreciate your consideration of our request.

Respectfully,

² 84 Fed. Reg. 2139 at 2146-2148 (February 6, 2019).

³ M. Sant’Ambrogio and G. Staszewski, Michigan State University, [Public Engagement with Agency Rulemaking](#) (Administrative Conference of the United States, November 19, 2018) at p. 3.

⁴ Id. at p. 10.