

June 11, 2026

Andrew Reisig  
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OMB Office of Federal Financial Management  
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**RE: Request for 45-Day Extension of Comment Period — Federal Register Notice, OMB-2026-0034, Regulation for Federal Financial Assistance**

Dear Mr. Reisig and Mr. Savary,

The American Institute of Biological Sciences (AIBS) writes to request a 45-day extension of the comment period for the proposed rule by the Office of Management and Budget (OMB) to revise Title 2 of the Code of Federal Regulations, Federal Register Notice OMB-2026-0034 (91 FR 32198), published May 29, 2026. Comments are currently due July 13, 2026. We ask that OMB extend the deadline to August 27, 2026 or later.

AIBS is a scientific association dedicated to promoting informed decision-making that advances biological research and education for the benefit of science and society. AIBS works to ensure that the public, legislators, funders, and the community of biologists have access to information that can guide informed decision-making. Our members include professional societies, research institutions, museums, botanic gardens, and universities, whose work depends on federal grant funding.

This proposed rule represents one of the most transformative revisions to the Uniform Guidance—the framework governing Federal financial assistance—since its establishment. It amends 91 parts of Title 2 of the CFR across 456 sections, adding 52 new subsections and fully restating 375 sections. The changes span a wide range of substantive areas—including award termination and suspension authority, pre-issuance review of grant applications, publication costs, foreign collaboration restrictions, procurement standards, and subrecipient oversight—and would affect the entirety of federal grant-making, including tens of billions of dollars annually in National Science Foundation and National Institutes of Health funding that supports scientific research at universities and research institutions across the country.

Forty-five days is insufficient time for the careful, multi-disciplinary analysis this complex and wide-ranging proposed rule demands. Compounding this, the rulemaking never appeared on the Unified Agenda and no EO 12866 meetings were requested while this rule was under review at OMB's Office of Information and Regulatory Affairs, meaning affected stakeholders had no advance notice that OMB

was pursuing rulemaking of this scope. Beyond the procedural concern, OMB's own Regulatory Impact Analysis acknowledges that it was unable to quantify the expected costs or benefits of the proposed rule and explicitly requests public comment to provide the cost burden estimates, operational data, and implementation information needed to evaluate the proposal. Because OMB is expressly relying on public input to complete the evidentiary record, the adequacy of that record depends directly on stakeholders having sufficient time to conduct meaningful analysis and respond substantively.

An extension would allow affected stakeholders to provide the kind of empirical, evidence-based input that the notice-and-comment process is designed to generate—and that OMB has itself identified as necessary. We respectfully request that OMB grant a 45-day extension. A 90-day comment period for changes of this scale and consequence would be entirely consistent with past practice and appropriate given the reasons laid out above.

Thank you for considering this request.

Sincerely,



Scott Glisson  
Chief Executive Officer