

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 organizations across science, research, policy, and education 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.

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

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.

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

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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,

ACA: The Structural Science Society
Academic Pediatric Association
Academy for Radiology & Biomedical Imaging Research
Academy of Managed Care Pharmacy
Academy of Physicians in Clinical Research
AcademyHealth
Acoustical Society of America
ACRE
Acterra: Action for a Healthy Planet
ADAP Advocacy Association
Afterschool Alliance
Alliance for Academic Internal Medicine (AAIM)
Alliance for Aging Research

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.

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Alliance for Data Science and AI
Alliance for Learning Innovation (ALI)
Alliance of Nurses for Healthy Environments
Alliance to Cure Cavernous Malformation
ALS Association
American Academy of Allergy, Asthma & Immunology
American Academy of Emergency Medicine
American Academy of Hospice and Palliative Medicine
American Academy of Neurology
American Academy of Nursing
American Academy of Pediatrics
American Alliance of Museums
American Anthropological Association
American Association for Anatomy
American Association for Cancer Research
American Association for Dental, Oral, and Craniofacial Research
American Association for Public Opinion Research
American Association for State and Local History
American Association for the Advancement of Science
American Association of Colleges of Nursing
American Association of Colleges of Pharmacy (AAPC)
American Association of Geographers
American Association of Immunologists
American Association of Nurse Practitioners
American Association of Physicists in Medicine
American Association of Physics Teachers
American Astronomical Society
American Brain Coalition
American Chemical Society
American College of Obstetricians & Gynecologists
American College of Physicians
American College of Radiology
American Educational Research Association
American Federation for Aging Research
American Gastroenterological Association
American Geophysical Union (AGU)
American Geriatrics Society
American Heart Association
American Industrial Hygiene Association
American Institute for Medical and Biological Engineering (AIMBE)
American Institute of Biological Sciences
American Institute of Ultrasound in Medicine (AIUM)
American Mathematical Society

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American Meteorological Society
American Musicological Society
American Nurses Association
American Occupational Therapy Association
American Oil Chemists' Society (AOCS)
American Ornithological Society
American Pediatric Society (APS)
American Pharmacists Association
American Physical Society
American Physiological Society
American Phytopathological Society
American Political Science Association
American Psychological Association
American Public Gardens Association
American Society for Biochemistry and Molecular Biology
American Society for Bone and Mineral Research
American Society for Cell Biology
American Society for Clinical Investigation
American Society for Clinical Pharmacology & Therapeutics
American Society for Gravitational and Space Research
American Society for Nutrition
American Society for Pathobiology
American Society for Pharmacology and Experimental Therapeutics (ASPET)
American Society of Agronomy
American Society of Biomechanics
American Society of Civil Engineers
American Society of Health-System Pharmacists
American Society of Hematology
American Society of Nephrology
American Society of Plant Biologists
American Society of Tropical Medicine and Hygiene (ASTMH)
American Speech-Language-Hearing Association (ASHA)
American Statistical Association
American Studies Association
American Thoracic Society
American Vacuum Society (AVS)
Americans for Medical Progress
Animal Behavior Society
Arkansas Immunization Action Coalition (Immunize Arkansas)
Arthritis Foundation
ASCP - Age Friendly Pharmacists and Pharmacies
Asian American Scholar Forum
ASM

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ASM International
Association for Academic Pathology (AAPath)
Association for Psychological Science
Association for Research in Vision and Ophthalmology (ARVO)
Association for Slavic, East European, and Eurasian Studies
Association for the Sciences of Limnology and Oceanography
Association for Women in Science
Association of American Cancer Institutes
Association of Art Museum Directors
Association of Biomolecular Resource Facilities (ABRF)
Association of Children's Museums
Association of Environmental Engineering and Science Professors
Association of Family Medicine Residency Directors
Association of Maternal & Child Health Programs
Association of Medical School Pediatric Department Chairs
Association of Population Centers
Association of Public Health Nurses
Association of Research Libraries
Association of Science and Technology Centers
Association of Science Museum Directors
Association of University Presses
Autoimmune Association
Big Cities Health Coalition
Biocom
Biophysical Society
Botanical Society of America
California Botanical Society
California Institute for Regenerative Medicine
California River Watch.
California State University
Campaign for Tobacco-Free Kids
Campus Research Computing Consortium
Cancer Nation
Caregiver Action Network
Center for Open Science
Center on Budget and Policy Priorities
Cereals & Grains Association
Children's Cancer Cause
Children's Hospital Association
Clean Energy Business Network
Climate Psychiatry Alliance
Coalition for Academic Scientific Computation
Coastal and Estuarine Research Federation

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College for Creative Studies
Computing Research Association
Concord Consortium
Conference of Boston Teaching Hospitals
Council of Medical Specialty Societies
Crohn's & Colitis Foundation
Crop Science Society of America
CSM Advising LLC
CT Public Health Association
Cure Alzheimer's Fund
Cure HHT
Cushman Foundation for Foraminiferal Research, Inc.
Dana-Farber Cancer Institute
debra of America
Defend Public Health
DefendResearch
Digital Promise Global
Ecological Society of America
EdTrust
Education Reform Now
Emory University
Endocrine Society
Entomological Society of America
EveryLife Foundation for Rare Diseases
Evidence Advocacy Center
Federation of American Scientists
Federation of American Societies for Experimental Biology (FASEB)
Federation of Associations in Behavioral and Brain Sciences (FABBS)
Fight Colorectal Cancer
Fox Chase Cancer Center -- Temple Health
Friedreich's Ataxia Research Alliance (FARA)
Genetics Society of America
Geological Society of America
George Washington University Cancer Center
German Studies Association
Gerontological Society of America
Global Health Technologies Coalition (GHTC)
GreenLatinos
HealthHIV
Heart Failure Society of America
Helminthological Society of Washington
HIV Medicine Association
Huntsman Cancer Institute

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IEEE-USA
Illinois Public Health Association
Immune Deficiency Foundation
Infectious Diseases Society of America
INFORMS
Institute for Progress
International Society for Stem Cell Research
International Zebrafish Society (IZFS)
Internet2
Iowa Public Health Association
Lasker Foundation
Latino Caucus for Public Health (APHA)
Lewy Body Dementia Association
Lupus and Allied Diseases Association, Inc.
Massachusetts Public Health Alliance
Materials Research Society
Mathematical Association of America
MaxRevenue
ME/CFS San Diego
MEAction Maryland
MEAction North Carolina
MEAction, California
Minerals, Metals & Materials Society
Minnesota Public Health Association
Montana Climate and Health
NAPCRG
National Alliance for Caregiving
National Association for Biomedical Research (NABR)
National Association of City Transportation Officials
National Association of School Nurses
National Ataxia Foundation
National Consumers League
National Council of Teachers of Mathematics (NCTM)
National Council on Public History
National Education Association
National Foundation for Infectious Diseases
National Health Council
National Hispanic Health Foundation
National Humanities Alliance
National Low Income Housing Coalition
National Medical Association
National Organization for Dental Immunizers
National Postdoctoral Association

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National School Boards Association
National Women's Law Center
National Women's Studies Association
Natural Resources Defense Council
Natural Science Collections Alliance
NDRI
Nebraska Cures
New America's Future of Work & Innovation Economy Program
NJME/CFS Association
North American Vascular Biology Organization
Oceanography Society
Optica, Advancing Optics and Photonics Worldwide
Organization of Biological Field Stations
Partnership for Public Service
Pediatric Nurse Practitioner House Calls
Pediatric Policy Council
Physicians for Social Responsibility
Planetary Society
Plug In America
Population Association of America
Post-Acute and Long-Term Care Medical Association
Prevent Blindness
Psychonomic Society
Pulmonary Fibrosis Foundation
reDesignED
Research!America
RetireSafe
Salem Oaks Consulting
San Diego Natural History Museum
San José State University
Sanford Burnham Prebys Medical Discovery Institute
Seismological Society of America
SERP Institute
Shock Society
Sigma Xi, The Scientific Research Honor Society
Social Science Research Council
Society for Advancement of Chicanos/Hispanics and Native American in Science
Society for Applied Anthropology
Society For Biomaterials
Society for Birth Defects Research and Prevention
Society for Developmental Biology
Society for Experimental Biology and Medicine
Society for Glycobiology

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Society for Healthcare Epidemiology of America
Society for Industrial and Applied Mathematics
Society for Industrial Microbiology and Biotechnology
Society for Laboratory Automation and Screening
Society for Leukocyte Biology
Society for Maternal-Fetal Medicine
Society for Neuroscience
Society for Pediatric Radiology
Society for Pediatric Research (SPR)
Society for Personality and Social Psychology
Society for Range Management
Society for Research in Child Development (SRCD)
Society for the Psychological Study of Social Issues
Society for the Study of Amphibians and Reptiles
Society for the Study of Evolution
Society for Women's Health Research
Society of Behavioral Medicine
Society of Environmental Toxicology and Chemistry of North America (SETAC North America)
Society of Herbarium Curators
Society of Nuclear Medicine and Molecular Imaging
Society of Systematic Biologists
Society of Teachers of Family Medicine
Software & Information Industry Association
Soil Science Society of America
Solve M.E.
SPARC
Speculative Technologies
Spina Bifida Association
St. Jude Children's Research Hospital
Stand Up for Science
STEM Education Coalition
Study Group
T2M Advisors
TERC, Inc.
Texas Behavioral Science and Policy Institute
Third Way
TSC Alliance
UCLA
Union of Concerned Scientists
University of Colorado
University of Colorado Boulder
University of Colorado Anschutz
University of Kentucky Markey Cancer Center

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University of Oregon
University of Rochester
Up for Growth Action
Vision Zero Network
West Sonoma County Alliance
Wildlife Society
Wistar Institute
Women's Health Institute
Woodley Park Institute