

ASAE Comment Guide: Proposed OMB Rule on Federal Financial Assistance (2 CFR Part 200)

Comment deadline: July 13, 2026

Introduction:

On May 29, 2026, the White House Office of Management and Budget (OMB), joined by more than 40 federal grantmaking agencies, published a Notice of Proposed Rulemaking to revise the "Uniform Guidance" (2 CFR Part 200), the government-wide rules that govern federal grants, cooperative agreements, and other federal awards (91 FR 32198).

Several of the proposed changes would directly affect associations and the members, institutions and professionals they serve. Broadly, the proposal would do two things of concern to the association community. First, it would restrict the **cost principles** that determine what grantees may charge to a federal award, limiting or eliminating the ability to charge association membership dues, periodical subscriptions, conference attendance and journal publication fees.

Second, it would change the way **awards are administered**, adding new review, monitoring, and termination provisions that affect associations that receive or pass through federal funds.

OMB is accepting public comments on the proposal, and comments are due no later than **July 13, 2026**.

Public comments are one of the most effective tools available to shape the final rule. Concrete, real-world information about how these changes would affect your organization, specific numbers, percentages and short examples, is the single most persuasive input a commenter can provide. We encourage organizations to take a measured, solutions-oriented posture in their own comments.

What follows is a comment guide designed to equip members with the information needed to file their own public comments. It summarizes each proposed change of concern in plain language and offers a set of prompts you can use to personalize your own comments with the impact these proposed rules will have on your organization. You do not need to address every provision.

How to Submit a Comment

- **Where to file:** Comments must be submitted electronically at www.regulations.gov to **docket OMB-2026-0034**. Reference the rule "OMB-2026-0034, Regulation for Federal Financial Assistance" in the comments you file.
- **Comment deadline:** Comments are due on or before **July 13, 2026**.
- **Cite specific provisions:** Begin each comment with the relevant section number in brackets (for example, [200.454]), as OMB requests in the proposed rule.

- **Personalize comments:** Comments that reflect your organization's specific experience, programs, and data carry more weight. Use the prompts in this guide as a starting point, then add your own facts and examples.
- **Offer constructive alternatives:** Where possible, offer constructive alternatives that would prevent harm to your organization but may speak to the agency's stated goals for the proposals.
- **Note reliance interests:** OMB has specifically invited comment on "reliance interests", or the commitments organizations made in reliance on the current rules. Wherever a provision would change a longstanding rule, document concretely what your organization invested, hired, planned, or obligated in reliance on it, and what unwinding it would cost.
- **Public comments are published publicly:** Anything you submit will be posted publicly. Do not include confidential business information or personal details you would not want made public.

Proposed Changes and Comment Guidance

The sections below describe each proposed change of concern, in OMB's terms, followed by guidance you can use to develop your own comments.

Part 1: Cost Principles Affecting Association Revenue

1. Membership dues: § 200.454(a)

OMB's proposed change: Dues would be chargeable to a federal award only if "necessary to fulfill the award requirements" and approved in advance, in writing, by the federal agency.

Comment Guidance:

- Describe how memberships in your organization help achieve the goals of federally funded work, for example, through access to standards, training, credentialing and the dissemination of results.
- Explain how memberships are low cost relative to the value they provide to award performance.
- Describe whether the proposed approval process would likely lead your members to opting to not charge membership dues to their grants and any administrative burden that may be directed to your organization if members were to attempt to navigate approval processes.

2. Periodical subscriptions: § 200.454(b)

OMB's proposed change: Subscriptions to business, professional, academic and technical periodicals would become unallowable, with no approval pathway.

Comment Guidance:

- Describe how access to professional, academic and technical periodicals is a basic input to competent performance of federally funded work.
- Identify which subscriptions or publications your organization or members produce, and the consequence of grantees' losing the ability to charge them to awards.
- If applicable, describe the practical difficulty of removing subscriptions from library budgets and indirect cost pools.

3. Conference attendance: § 200.432(b)

OMB's proposed change: Conference attendance would be chargeable only if expressly approved by the agency and written into the award's terms and conditions.

Comment Guidance:

- Explain that the current rule already requires conference attendance to be necessary and reasonable for award performance.
- Describe timing and logistical problems: award terms are fixed before conference schedules exist, so event-by-event written approval would force continuous award amendments (if amendments are approved at all). Include practical examples and logistical concerns from your own conference structure, such as registration deadlines, early-bird pricing and speaker recruitment.
- Describe how conferences serve federally funded work, (i.e., they are where federally funded results are disseminated and where the technical workforce is trained).
- If you can offer one, suggest a workable alternative, for example, approving a conference or travel budget category (or a dollar threshold) at the time of award rather than requiring event-by-event approval.

4. "Issue advocacy" costs and membership exclusion: §§ 200.450(c)(1)(iv), 200.454(d)

OMB's proposed change: Costs of "issue advocacy or public messaging" on social, political or policy positions unrelated to an award's performance requirements would become unallowable, and membership in any organization whose "primary purpose" is lobbying or "issue advocacy" would become an unallowable cost.

Comment Guidance:

- Note that the terms "issue advocacy" and "public messaging" are undefined and difficult to administer in practice.

- Describe how routine association communications could be mischaracterized by auditors as "issue advocacy" or "public messaging," and how that could put members' dues at risk across the board.
- Estimate the administrative burden of the organization-wide cost tracking and segregation that unallowable-cost rules would trigger (staff time, accounting system changes).
- If you can offer one, suggest a workable alternative, for example, defining the terms by reference to existing Internal Revenue Code lobbying concepts and allowing grantees to rely on an organization's public filings (such as the Form 990) as a safe harbor.

5. Journal publication charges: § 200.461 (with § 200.421)

OMB's proposed change: Page charges, article processing charges and open-access fees would become unallowable unless required by statute or approved case-by-case.

Comment Guidance:

- Explain that the government funds research so that the results will be used, and, if applicable to your organization, describe how publication charges support that purpose.
- If you can, supply data on the page charges, article processing charges and open-access fees your organization or journal program handles. The Regulatory Impact Analysis specifically requests this data.
- Describe the impact on research budgets and on nonprofit society publishers if these costs become unallowable.

Part 2: Award Administration Provisions Affecting Associations as Recipients

6. Political pre-issuance review of awards: § 200.205(b)

OMB's proposed change: Senior political appointees would review every discretionary award against criteria including whether it "demonstrably advance[s] the president's policy priorities" and avoids "anti-American values;" peer review would become advisory only.

Comment Guidance:

- Describe how undefined criteria, such as whether an award "demonstrably advances the President's policy priorities" or avoids "anti-American values," make awards unpredictable.
- Explain whether this unpredictability would deter your organization from applying for awards.

7. Applicant "risk" factors: § 200.206(b)(2)(vii)–(viii)

OMB's proposed change: Agencies may weigh an applicant's "history of questionable practices" (including activities deemed "inconsistent with" civil rights or religious liberty laws, based on publicly available information) and the applicant's "memberships and affiliations."

Comment Guidance:

- Explain how penalizing never-adjudicated conduct would lead to inconsistent or arbitrary decisions about what counts as a "questionable practice."

8. National policy funding conditions (DEI and related): § 200.300(b)

OMB's proposed change: Awards may not be used to "fund, promote, encourage, subsidize or facilitate" specified categories, including DEI practices that violate anti-discrimination law; unlawful DEI is defined to include activities where "intentional proxies for race" would be used as a selection criterion for program participation; violations are treated as material breaches.

Comment Guidance:

- Explain that, as drafted, the provisions give compliance officers and auditors no workable standard, and describe how treating a violation as a material breach would chill lawful activity well beyond what the law requires.

9. Event services viewpoint-neutrality mandate: § 200.219

OMB's proposed change: Recipients, including private organizations, for federally funded activities, could not "discriminate" by viewpoint in providing event services, with liability for policies having the "purpose or effect" of suppressing expression and for "unreasonable" fees or security costs.

Comment Guidance:

- Describe your organization's role as a convening organization and the ordinary event-management decisions you make, security, pricing, speaker and exhibitor selection and code-of-conduct enforcement.
- Explain how injecting an undefined federal speech-regulation standard into those decisions would affect your events.
- Describe the problem with "effect"-based liability, how neutral policies could be condemned based on outcomes that organizers do not control.

10. Subrecipient "reputational" monitoring: § 200.332(i) (with §§ 200.331(c), 200.332(h))

OMB's proposed change: Pass-through entities would have to "ensure" that sub-recipients take no actions that "could significantly damage the reputation" of the pass-through entity, the agency or the federal government, on pain of termination; and transfers to affiliates and related entities would have to be classified and reported as sub-awards or contracts.

Comment Guidance:

- Explain how the duty to "ensure" sub-recipients take no reputation-damaging action is standard-less and cannot be operationalized through any internal control.
- If you pass federal funds to chapters or affiliates, describe what monitoring of their general activities this would require, and the burden involved.

11. Fixed amount subawards: § 200.333

OMB's proposed change: Fixed-amount subawards would be prohibited entirely.

Comment Guidance:

- If applicable, describe how your organization uses fixed-amount subawards, (i.e., As a tool for funding chapters and mini-grants on small, well-defined projects.)
- Explain how fixed-amount instruments help minimize administrative burden.
- Describe the impact of prohibiting them entirely.

12. At-will termination and suspension: §§ 200.340–200.343

OMB's proposed change: Every discretionary award would have to permit termination whenever the agency deems it in the government's interest (including by class of awards), with only brief explanations, no hearing rights, 90-day stop-work authority and wind-down cost recovery left to agency discretion.

Comment Guidance:

- Describe the commitments your organization makes in reliance on awards, hiring staff and signing venue and vendor contracts.
- Note costs associated with award suspension and secondary procurement contracts and how this policy might change the structure of contracts. The RIA specifically seeks comment on this.
- Explain how at-will termination, without cost protection, would affect your willingness to make those commitments.
- If applicable, describe any termination or stop-work you have experienced and what it cost you.

Template Comment Letter

The template below is a starting point. Personalize it with your organization's name, your own experience and the specific provisions most relevant to your work.

[Your Full Name]

[Title, Organization]

[City, State]

[Email]

Re: OMB-2026-0034, Regulation for Federal Financial Assistance

To Whom It May Concern,

Thank you for the opportunity to comment on the proposed revisions to the Uniform Guidance for Federal Financial Assistance, 2 CFR Part 200 (OMB-2026-0034; 91 FR 32198).

About my organization. My name is [Your Name], and I am [Title] at [Organization]. [Add one or two sentences describing what your organization does, the members or communities it serves, and how it uses or interacts with federal awards.]

How the proposal would affect us. [Describe whether your organization has applied for, received or passed through federal awards and how the proposed changes would affect your organization, your members and the communities you serve. Use concrete numbers and examples where you can, revenue at risk, staff time, attendance or specific programs.]

Specific provisions of concern. [Choose one or more provisions from this guide that affect you most. For each, identify the provision and section number, explain how it would affect your work, why you oppose it as drafted and, where you can, what alternative approach would prevent harm to your organization but provide constructive feedback to the stated intent of OMB's proposal. The Comment Guidance prompts above can help you develop these points.]

Conclusion. [Summarize your position and any specific request, for example, that OMB retain the current rule, revise the provision or adopt a workable alternative.] Thank you for considering these comments.

Sincerely,

[Your Name]

[Title, Organization]