



Mr. Russ Vought  
Director  
The Office of Management and Budget  
725 17th Street NW, Washington, DC 20503

Re: RIN 3133-AG07 / OMB-2026-0034, Regulation for Federal Financial Assistance

June 24, 2026

Dear Director Vought:

I write on behalf of the Clean Energy Business Network, the small business voice of the U.S. energy economy. Our nonprofit, nonpartisan network spans more than 8,700 business and community leaders across all 50 U.S. states, over 420 congressional districts, and nearly every energy technology: power generation, transportation fuels and systems, critical minerals recovery, storage, advanced nuclear, and beyond. Many of the companies in our network are energy innovators that have brought new technologies to market with support from federal investments by the U.S. Department of Energy and other agencies—particularly through the Small Business Innovation Research/Small Business Technology Transfer (SBIR/STTR) programs.

We appreciate the opportunity to respond to the Office of Management and Budget (OMB)'s proposed *Regulation for Federal Financial Assistance*, released on May 29, 2026. Given the complexity of the Proposed Rule and the significant impacts it would have across the entire U.S. economy, we are writing to request an extension of the current July 13, 2026 deadline for public comments.

The proposed rule would extensively rewrite the “Uniform Guidance” that has been in place since 2014 (updated in 2020 and 2024), amending 91 parts across 256 different sections of these existing rules. These changes would apply to virtually all federal grants and cooperative agreements, totaling approximately \$1.2 trillion per year,<sup>1</sup> roughly 15% of which (\$179 billion) goes to small entities.<sup>2</sup> Impacts would extend across federal funding recipients, subrecipients, and beneficiaries of every type—small businesses, corporations, academic institutions, nonprofits, state/local governments, the general public—and across every economic sector.

The proposed rule suggests it is a “significant” regulatory action under Executive Order 12866. However, we believe that annual compliance costs for current and future federal grantees and loan recipients would well exceed the \$100 million threshold to qualify as “economically significant,” as defined in EO 12866. The proposed rule would expand existing requirements or create requirements for verification and reporting across a range of issues: cost/price analysis, written justifications for payment, the use of E-Verify for employment authorization, Buy America provisions, reporting executive compensation for subrecipients, advance approval for conference attendance, and reviewing internal policies and procedures to ensure adherence to DEI prohibitions. Additionally, the uncertainty triggered by the expanded authority to terminate grants at any time, for any reason, could generate additional liabilities for recipients and subrecipients, requiring additional legal review of contracts and driving up the costs of goods and services procured in fulfillment of their awards. Given that the government issues hundreds of thousands of new federal financial awards per year,<sup>3</sup> these added compliance costs conservatively add up to over \$100 million. An “economically significant” designation would require OMB to perform a thorough economic quantification of the Proposed Rule's impacts.

We also disagree with OMB’s assertion that the proposed rule would not have a significant economic impact on a substantial number of small entities. Federal agencies made over 98,000 new grants and loans to small businesses and individuals in FY2024 alone,<sup>4</sup> and each of these would be covered by new reporting and administrative requirements and restrictions on allowable expenses. These impacts on small businesses require OMB to publish deeper analyses and consider less burdensome alternatives, in accordance with the Regulatory Flexibility Act. From CEBN’s experience supporting small businesses, many small entities do not have dedicated government affairs professionals and have relatively little experience commenting on federal rulemakings. It is critical to ensure that there is adequate time for a wide breadth of stakeholders to thoroughly assess the proposed rule and convey their reactions.

OMB has offered only a 45-day comment period for its proposed updates—shorter than the 60 days typically afforded for most rulemakings—and seeks to make the rule effective by October 1, 2026. Given that the Administrative Procedure Act requires a 30-day delay between finalization of a rulemaking and its effective date, this would put OMB’s target date for finalizing the rule at September 1. This rushed timeline would provide only a few days for reviewing and responding to public comments before reworking the final rule.

Both of the previous modifications to the Uniform Guidance (in 2020 and 2024) offered a 60-day public comment period, were finalized roughly 7 months later, and took effect 10-12 months after the proposed guidance was initially released.<sup>5</sup> This was the case even though they modified fewer parts of the existing rules, versus the 91 parts modified by the current proposed regulations. Given the enormous scope of this proposed rule, its economic significance, and the profound impacts it would have on so many stakeholders, we feel it warrants an even longer comment period than these previous revisions and request a minimum 60-day extension beyond the current deadline.

We intend to share further comments on the substance of the Proposed Rule at a later date. We appreciate your consideration of this request.

Sincerely,



Lynn Abramson  
President  
Clean Energy Business Network

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<sup>1</sup> <https://fiscal.treasury.gov/accounting/us-financial-report/financial-management>

<sup>2</sup> <https://www.regulations.gov/document/OMB-2026-0034-0006>

<sup>3</sup> <https://www.usaspending.gov/>

<sup>4</sup> <https://www.regulations.gov/document/OMB-2026-0034-0006>

<sup>5</sup> 2020 Update: OMB published proposed updates to the Guidance on 01/22/2020 with 60 days for public comment, finalized these updates on 08/13/2020, and set an effective date of 11/20/2023, except for two specific provisions which took effect immediately. See <https://www.federalregister.gov/documents/2020/01/22/2019-28524/guidance-for-grants-and-agreements> and <https://www.federalregister.gov/documents/2020/08/13/2020-17468/guidance-for-grants-and-agreements>. 2024 Update: OMB published proposed updates to the Guidance on 10/5/2023 with 60 days for public comment. The proposed updates were preceded by a Request for Information, issued 02/09/2023. OMB finalized these updates on 04/22/2024, with an effective date of 10/02/2024. See <https://www.federalregister.gov/documents/2023/02/09/2023-02158/omb-request-for-information-rfi>, <https://www.federalregister.gov/documents/2023/10/05/2023-21078/guidance-for-grants-and-agreements>, and <https://www.federalregister.gov/documents/2024/04/22/2024-07496/guidance-for-federal-financial-assistance>.