June 17, 2026

Honorable Russell T. Vought, Director
Office of Management and Budget
725 17th Street, NW
Washington, DC 20503

Joel Savary & Andrew Reisig
OMB Office of Federal Financial Management
725 17th Street, NW
Washington, DC 20503

Re: 45-Day Extension Request for Response to Federal Register Notice, OMB-2026-0034, Regulation of Federal Financial Assistance

Dear Director Vought, Mr. Reisig and Mr. Savary:

The undersigned organizations – representing counties, cities, towns, villages, state legislatures, regional planning and development organizations, metropolitan planning organizations, and public finance officials across the United States – respectfully request a 45-day extension of the public comment period for the proposed revisions to Title 2 of the Code of Federal Regulations (2 CFR), Subtitle A (Federal Register Notice 2026-10817, 91 FR 32198). The current comment period closes on July 13, 2026. This 45-day window is insufficient to meaningfully analyze and respond to a rulemaking of this scope and consequence.

The proposed rule spans 108 pages of the Federal Register (FR 32197 through 32304) and represents a government-wide rewrite of 2 CFR Part 200 — the regulation governing every federal grant, cooperative agreement, and pass-through award. It was issued as a joint rulemaking by OMB together with every federal grantmaking agency, and conditions an estimated $1 trillion or more in annual federal grant outlays affecting states, tens of thousands of local governments, and a broad range of nonprofit and community subrecipient organizations nationwide. The rule's substantive changes include new policy requirements, modifications to the grant termination framework, integration of federal grants administration with the Treasury Do Not Pay (DNP) system at § 200.305, and — most significantly — the reclassification of 2 CFR Subtitle A from guidance to binding regulation.

State and local governments are not only recipients of federal grants — we are the primary implementing layer through which federally appropriated funds reach communities for public safety, public health, transportation, housing, workforce development, child welfare, and emergency management. The proposed rule's changes will affect state and local government program design and service delivery in substantial ways that require careful operational review before the comment period closes.

Adequate time for stakeholder engagement is essential to ensure that comments submitted reflect the on-the-ground realities of implementing federal programs at the local level. A 45-day extension would enable state and local governments, and our subrecipient partners, to provide OMB with the substantive input that a rulemaking of this magnitude warrants.

While we recognize the proposed rule's October 1, 2026 implementation target, the substantive scope of the proposed changes requires additional time for stakeholder engagement before the rule is finalized. Granting a 45-day extension remains consistent with that implementation timeline and would yield a more complete administrative record.

For these reasons, we urge OMB to grant at least a 45-day extension of the comment period. A more complete record will serve the interests of both the public and the agency and help ensure that policy changes of this magnitude are informed by a full understanding of their practical consequences.

Respectfully,

Clarence E. Anthony
CEO and Executive Director
National League of Cities

Tim Storey
Executive Director
National Conference of State Legislatures

Matthew D. Chase
Executive Director/CEO
National Association of Counties

David Atkins
Executive Director/CEO
The Council of State Governments

Tom Cochran
CEO and Executive Director
United States Conference of Mayors

Julia D. Novak
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International City/County Management Association

Chris Morrill
Executive Director/CEO
Government Finance Officers Association

Joe McKinney
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National Association of Development
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Bill Keyrouze
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Association of Metropolitan Planning
Organizations

Erich Zimmermann
Executive Director
National Association of Regional Councils