

Policy Update: OMB's Uniform Guidance Revision - What Associations and Societies Need to Know

Lewis-Burke Associates LLC – June 9, 2026

On May 29, 2026, the Office of Management and Budget (OMB) released a proposed Rule titled “Regulation for Federal Financial Assistance”, outlining significant revisions to federal requirements governing grants, cooperative agreements, and other forms of federal financial assistance. While these changes are primarily aimed at direct recipients of federal funding, the proposed Rule has major implications for associations, scientific societies, patient organizations, and other nonprofit research and higher education stakeholders, even if they are not direct recipients of federal financial assistance.

OMB is accepting comments on the proposal through **July 13th, 2026** and Lewis-Burke Associates strongly encourages all organizations to submit comments on the proposal through [Regulations.gov](https://www.regulations.gov) (see [Tips for Submitting Comments](#) section below).

We have highlighted several proposed changes to the Rule that may be of particular interest to nonprofit organizations beyond research institutions or direct federal award recipients, and we encourage organizations to consider addressing these issues in their comments. We have also highlighted several major provisions that, while not specific to associations or societies, could have broad impacts for science and research if adopted. This is not intended to be a comprehensive analysis, and Lewis-Burke encourages organizations to review the proposed Rule.

Issues of particular interest to associations:

- **Conference attendance pre-approval (§200.432):** Under the proposed Rule, federal funds would not be allowed for conference attendance unless such attendance is expressly approved by the federal agency **and** included in the terms and conditions of the federal award. This would require scientists to know, at the time of the award, which conferences they, and anyone supported by the grant, plan to attend over the entire multi-year project period of the award. This could significantly impact the ability of federally funded scientists, scholars, and students to attend society or association meetings, workshops, or conferences at which research results are shared and communicated and will likely disproportionately affect researchers at institutions that do not have the resources to support such attendance in the absence of federal funds.
- **Restrictions on lobbying or advocacy (§200.450):** OMB proposes to add new restrictions on recipients of federal funds related to participation in “issue advocacy or public messaging that promotes or opposes a particular social, political, or public policy position unrelated to the statutory objectives or performance requirements of the Federal award, including messaging designed to influence public attitudes.” Further restrictions apply to influencing State policymakers. Depending on how this is interpreted, it could impact organizational efforts to provide public information or education on areas where they have expertise.

- **Restrictions on journal subscriptions, memberships, and professional activities (§200.454):** The proposal would make journal subscriptions, organizational memberships, and professional activities unallowable costs unless they are deemed necessary to fulfill the requirements of the award, and only then with prior approval from the federal Agency. Membership in organizations whose primary purpose is issue advocacy or lobbying would be an unallowable cost. This represents a significant change from the current guidance, under which these costs are allowable.
- **Publication costs no longer allowed (§200.461):** Under the proposed Rule, no federal funding could be used to pay for the costs of publication, unless it is specifically required by statute or the Agency, as determined on a case-by-case basis. This would include “page charges, article processing charges (APCs), or similar fees such as open access fees for professional journal publications and other peer-reviewed publications.” The proposal notes that “A general requirement to make results publicly available must not be construed as authorizing publication costs.”
- **Evaluations of funding recipients based on their organizational affiliations and memberships (§200.206):** The proposed Rule would expand the list of considerations Agencies need to consider when assessing whether a recipient organization poses a risk as a funding recipient. New criteria include membership in or affiliation with organizations that “violate federal law, undermine public safety or national security, or advocate for the overthrow of the United States Government.” Additional criteria would examine whether the applicant has a history of “questionable practices,” such as plagiarism, discredited or non-replicable studies, or activities inconsistent with federal civil rights laws or religious liberty statutes.
- **Expanding event neutrality to private organizations (§200.219):** Public entities have long been required not to discriminate based on viewpoint, content, or subject matter of speech. The proposed Rule clarifies that federal funding recipients providing services for events, meetings, or other expressive activities may not deny or reduce services, impose additional fees or security costs, or apply policies that effectively suppress lawful speech on the basis of viewpoint or subject matter. The proposal would extend these requirements to non-public entities when the relevant activities fall within the scope of a federally funded award.

Broader research community concerns with the proposed Rule:

- **Major change in regulatory authority:** Currently, the framework for federal financial assistance (2 CFR Part 200) is classified as “guidance” and is the joint responsibility of OMB and 41 federal departments and agencies (who have co-issued this proposal). Under the proposed Rule, this would be revised to “regulation,” and OMB would have authority for future amendments to the new “Uniform Grants Regulation.”

- **New requirements for grant approval (§200.205):** OMB proposes to change the award-approval process so that all discretionary awards must be reviewed by “senior political appointees,” who would be required to apply specific criteria, including evaluating whether an award “demonstrably advance[s] the President’s policy priorities, [is] not used for discriminatory purposes, and do[es] not promote “anti-American values.” The proposal also states that, as part of this review and approval process, agencies should give preference to institutions with lower indirect cost rates, agencies should award grants to a “broad range of recipients”, and that they should prioritize institutions that demonstrate a “commitment to rigorous, reproducible scholarship over its historical reputation of perceived prestige.”
- **Increased ability to terminate awards (§200.340):** OMB proposes to make it far easier for awards to be terminated at any time for nearly any cause.
- **Prohibitions on DEI (§200.300; §200.218):** The proposed Rule would codify the actions of multiple Executive Orders and Trump Administration policies that prohibit federal funding of Diversity, Equity, Inclusion, and Accessibility (DEI/DEIA) or “gender ideology” programs, practices, or activities. This includes a prohibition on funding to support or promote “disparate-impact liability theories” based on sex, race, or age.
- **Barriers to international collaboration (§200.220):** OMB proposes to add a section to the Rule that creates a broad and ambiguous prohibition from using federal funds to support collaborations, agreements, programs, or other activities with “covered foreign countries” or “covered foreign entities”, defined essentially as any country designated as a foreign adversary, or particular concern, or subject to sanctions or restrictions related to defense, national security or intelligence activities and entities “owned or controlled” by such countries or which have been specifically designated as being of concern. This prohibition would apply regardless of whether the federal funding is used directly for program activities, research, technical assistance, travel, or indirect costs related to these collaborations.

Tips for submitting comments:

Given the potentially significant negative impact of this proposed Rule, Lewis-Burke strongly encourages organizations to submit comments by the **July 13, 2026** deadline. Please reach out to your Lewis-Burke point of contact if you would like assistance or guidance in preparing a response.

- Comments need to be submitted via Regulations.gov, accessed here (OMB-2026-0034): <https://www.regulations.gov/commenton/OMB-2026-0034-0001> - comments can be submitted directly into a text box or uploaded as a document or PDF.
- You do not need to comment on all provisions in the proposal; just on the provisions that are most relevant to your organization or perspective. **Specific examples demonstrating the impact of the proposed change are very important to include.**

- Guidance on providing effective comments:
https://www.regulations.gov/assets/files/Public-Comment-on-Federal-Regulations_Final.pdf