

Frequently Asked Questions about Submitting Comments on the OMB Proposed Rule

Following are answers to questions Research!America has been asked about commenting on the Office of Management and Budget's (OMB) [proposed Regulation for Federal Financial Assistance](#), along with some useful resources about the proposed rule itself.

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General Questions about Commenting

Who can submit a comment?

Absolutely anyone may submit a comment. That includes *you*!

Do I need to be an expert/scientist to submit a comment?

No. This rule is quite broad and impacts nearly anyone that receives federal grants or contracts. Anyone with insight into how this rule may have impact can comment with specific examples.

Should I comment if my organization is already submitting comments?

Yes, but be sure you are aware of your organization's public statement policies. Organizational comments often provide technical expertise or reflect institutional priorities, while individual comments can offer personal experiences and perspectives that help decision-makers understand how policies affect real people.

If you submit a comment as an individual, make it clear that you are expressing your own views and not speaking on behalf of your organization. If you plan to mention your employer or affiliated organization in your comment, check with the organization first to ensure you are following any applicable policies or guidance. Unless you have explicit permission, do not use organizational letterhead or state or imply that your comments represent the organization's official position.

Can multiple individuals from the same institution submit comments?

Yes, multiple individuals from the same institution can submit comments. Just make sure you are replying in your personal capacity and avoid submitting the exact same language as others. Only unique responses will be considered.

Can I submit multiple comments?

Yes, but if each comment isn't unique, OMB will treat all your comments as one submission.

How much time does it take to submit a comment?

While the time to draft a comment may vary from person to person or organization to organization, the submission form to submit comments is very brief; it is only three questions long.

Are comments public?

Yes. Comments submitted through Regulations.gov become part of the public record.

Can comments be submitted anonymously?

Yes, anonymous comments can be submitted, but they will still be included in the public record. Consider removing identifying information from comments and attachments if anonymity is important.

Can I include my employer, institution, or affiliation?

It is important to check with your employer to understand their policies on ensuring you are representing yourself as an individual citizen, not as a representative of the organization for which you work. While individuals can identify their employer, university, or organization without the comment being attributed to the organization, it is essential that you clearly state that you are commenting in your *personal* capacity. If you are speaking only for yourself, state that clearly.

Can I submit comments on behalf of my organization?

Do not submit comments on behalf of your organization unless you have authorization to represent the organization.

How to Write a Comment

What arguments should I consider when writing a comment?

Consider consequences of the proposed rule that will impact you, your family, your business, your community, or the people you serve. Also consider reviewing OMB's [Regulatory Impact Analysis of Proposed Revisions to 2 CFR](#) for OMB's expected impact

of each section of the rule. This can be valuable for identifying consequences that OMB may not have considered.

Do I need to comment on the entire proposal?

No. You can focus on a single provision, a handful of provisions, or all the provisions. Your comment is important regardless of its scope.

Can I support some parts of the proposal and disagree with others?

Yes. Comments do not need to be entirely supportive or entirely opposed.

Should I cite specific sections of the proposed rule?

Yes, be as specific as possible. Referencing the relevant section number (e.g., 200.340) will help ensure reviewers understand which provision you are discussing.

What makes a comment most effective?

An effective comment explains how the proposed rule could affect you, your organization, your community, or the issues you care about. Focus on the practical consequences of the proposal rather than your views about why it was proposed.

The strongest comments are specific. Explain which parts of the rule you support or oppose and why. Describe the effects of the proposal using facts, examples, data, or personal experience whenever possible.

Comments are especially helpful when they identify consequences that may not be obvious, point to information or analysis that is missing, or suggest additional data that would help clarify the proposal's impact.

Should I only explain concerns, or can I suggest alternatives?

You can suggest alternative approaches, revised language, implementation strategies, or other solutions.

What tone should I use?

Our advice is to maintain a professional and respectful tone, even when expressing strong disagreement. Again, it is important to focus on the practical consequences of the proposal rather than your views about why it was proposed.

Can I use a template?

Templates can be useful starting points, but commenters should personalize any template language. Public comments that are substantially identical are often grouped together and may be treated as a single submission during the review process. Using

your own words and sharing your unique perspective helps ensure your comment contributes distinct information to the administrative record.

What if someone has already made the same point I want to make?

Still submit a comment! Reinforcing a concern by adding your own unique story, perspective, experiences, or examples will reinforce the importance of this concern.

Submitting a Comment

Where do I submit a comment?

Visit [Regulations.gov](https://www.regulations.gov) and search for docket OMB-2026-0034. You can bypass this step and go directly to the portal [here](#).

I see that there is an option to type my comment directly into a text box or attach additional documents. Where should I put my comment?

It is important to complete the text box, but since it is limited to 5,000 characters, consider putting an executive summary in the text box and then attach supporting documents that provide additional details.

Can I submit supporting documents or attachments?

Yes. Commenters may upload up to 20 attachments such as PDFs or word documents. The size limit of the documents is 10MB.

Can comments be short?

Yes. A comment can be long or short. The most valuable comments are those that are original, focused on a specific issue, and include your own observations, examples, questions, or recommendations.

I've already submitted a comment but had a great idea about a different part of the regulation. Can I submit multiple comments?

Yes. You can submit multiple comments, particularly if you are addressing different provisions of the proposed rule or offering new information, examples, or perspectives. Rather than repeating the same points, focus each submission on a distinct issue and provide unique, substantive input that contributes to the administrative record.

Can I submit both an extension request and a substantive comment?

Yes. Stakeholders can submit a request related to the comment period and submit separate comments on the proposed rule. Note that numerous requests for an extension

on the comment period for the proposed rule have been submitted to OMB, and the agency has thus far denied those requests.

Should I wait until the last day to submit?

No. The volume of comments is an important indicator to the Administration and Congress whether this proposed rule should be reconsidered. Take the time you need to feel comfortable with your comments, then submit!

Tracking the Comments Process

Can I read comments submitted by others?

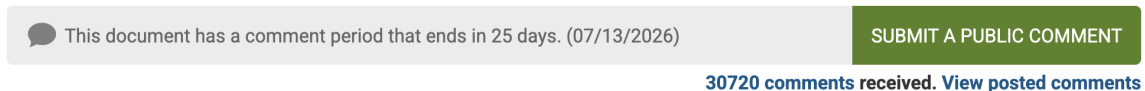
Yes. Regulations.gov allows users to view posted comments:

<https://www.regulations.gov/document/OMB-2026-0034-0001/comment>

How many comments have been submitted?

[Regulations.gov](https://www.regulations.gov) provides information on comments received and comments posted.

For example, here is a screenshot of the number of comments as of June 18, 2026 at 1 p.m. ET:



After Submitting Your Comment

What happens after the comment period closes?

OMB will review submitted comments and may revise the proposal before issuing a final rule.

Are there opportunities to engage after the comment period closes?

Stakeholders can seek meetings with OMB during the rulemaking process. Under [Executive Order 12866](#), any interested party may request a meeting with the Office of Information and Regulatory Affairs (OIRA) to discuss issues with a rule under review. You can request a meeting [here](#).

Additional Resources

- [HHS Regulations Toolkit](#)

- [Regulations.gov FAQs](#)
- [OMB Proposed Rule Text](#)
- [Regulation for Federal Financial Assistance Docket](#)
- [Where to Submit Comments](#)
- [View Other Comment Submissions](#)
- [Research!America Rule Summary](#)