



## Guide to Commenting on the OMB Proposed Rule “Regulation for Federal Financial Assistance”

This guide will walk you through how to write and submit a comment on the proposed OMB rule, “[Regulation for Federal Financial Assistance](#).” For additional information on this proposed rule, see our [Frequently Asked Questions Resource](#) or our [OMB Proposed Rule Resources page](#).

### Before You Begin

When drafting your comment, you may want to consider:		
How would the proposed rule affect your work?	How would the proposed rule impact scientific collaboration?	Would the proposed rule increase your administrative burden?
	Are there alternative approaches OMB should consider?	Is there any perspective missing from the <a href="#">Regulatory Impact Analysis</a> of this proposed rule?
Are there unintended consequences of the proposed rule?	Would the proposed rule affect patients, communities, or national priorities?	When you read the proposed rule, what questions does it raise for you?

### Preparing and Submitting Your Comment

1. **Review the [proposed rule](#).** Focus on the sections most relevant to your work, institution, research, patients, community, or areas of expertise.
2. **Identify the issue or issues you want to address.** You may comment on the proposed rule as a whole or focus on specific provisions. When commenting on specific parts of the proposed rule, cite the relevant section number. Referencing the specific section (e.g. § 200.340) you are discussing helps OMB understand exactly what part of the proposal your comment addresses. For an overview of the proposal, see Research!America’s [summary](#) and Ropes & Gray’s [analysis](#), which lists specific provisions that may be of interest.

3. **Visit the comment portal [here](#).** The docket page contains the proposed rule, supporting materials, submission instructions, and comments submitted by others.
4. **Identify your status.** When submitting, you will be asked to select whether you are submitting anonymously, as an individual, or as an organization. Clearly state if you are commenting within your personal capacity. *Only comment on behalf of your institution if you have express permission to do so.*
5. **Draft your comment.** If you are commenting on the implications of a specific section of the proposed rule rather than its overall impact, reference the specific section(s) of the proposal you are discussing. If you use a template or sample language, personalize your submission with your own experiences, examples, concerns, and recommendations. Agencies can consolidate their response to similar comments; adding your own experiences and perspectives can help your comment stand out as a unique contribution to the public record.
6. **Upload your comment.** In the [Federal Register's comment portal](#), there is an option to type your comment directly into the text box, but this has a 5,000-character limit. If you are uploading an attachment (you can submit up to 20), which is not constrained by character or word limits, use the required text box for a high-level summary or simply write "see attached."
7. **Review before submitting.** Confirm that your comment reflects your intended message and does not contain information you do not wish to make public.
8. **Submit your comment.** Yay, you did it!

## Need a Helping Hand?

**Feeling a bit overwhelmed by the idea of writing a comment?** Remember that your input can be short or long, and that if you have any questions, we're here to help! Email Trent Carlson at [tcarlson@researchamerica.org](mailto:tcarlson@researchamerica.org) for technical or moral support!

### Resources

[Research!America's  
Summary](#)

[Ropes & Gray's  
Analysis](#)

[National Council of  
Nonprofit's Summary](#)

[American Physical  
Society's Submission Tool](#)