



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: | | |
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| 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 Regulatory Impact Analysis 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](#), Ropes & Gray’s [analysis](#), and 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 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](#)