



June 4, 2026

Andrew Reisig  
Joel Savary  
OMB Office of Federal Financial Management

RE: Request to Extend Comment Period — Proposed Revisions to Uniform Guidance [OMB-2026-0034](#)

Dear Mr. Reisig and Mr. Savary:

On behalf of the 69 U.S. research universities that are members of the Association of American Universities (AAU), I write to request that the Office of Management and Budget (OMB) extend the current 45-day comment period for the proposed revisions to the regulation governing federal financial assistance—commonly referred to as the “Uniform Guidance”—as published in the Federal Register [Document 2026-10817; 91 FR 32198](#)) on May 29, 2026.

Given the breadth, complexity, and far-reaching implications of these proposed revisions, we respectfully request that OMB provide a minimum 90-day comment period. The proposed changes represent a substantial overhaul of the policies that guide how federal agencies administer federal investments and how research institutions conduct federally funded work. As such, stakeholders require sufficient time to carefully review, assess, and provide meaningful input on provisions that could significantly affect the U.S. research enterprise.

The proposal includes more than 120 revisions to current guidance, many of which would materially alter long-standing, foundational principles underpinning federally supported research. Among other areas, the proposed changes appear to expand agency authority related to award termination and suspension, impose a new prohibition that could limit international research collaboration, and significantly revise existing procurement standards. Of particular concern, provisions contained in the guidance could undermine key elements of the U.S. research ecosystem, including the use of merit-based scientific review and the longstanding commitment to scientific openness and broad dissemination of research results.


Taken together, the changes in the guidance have the potential to reshape the framework within which universities, federal agencies, and other stakeholders conduct and support America’s scientific research. Accordingly, it is critical that OMB provide adequate opportunity for thorough, thoughtful, and informed comments from the full range of affected stakeholders. A 45-day period is insufficient to support the level of analysis and engagement warranted by a proposal of this scope and significance.

Providing additional time will enable the research and higher education communities, along with the many other stakeholders that have an interest in the revised guidance, to conduct the careful review necessary to identify both the intended and unintended consequences of the proposed revisions. This, in turn, will better equip OMB with high-quality feedback to inform the development of final guidance that strengthens accountability while preserving the principles that have helped make the United States a global leader in science, innovation, and higher education.

We strongly urge OMB to extend the comment period to at least 90 days. AAU will continue to review the proposed rule and will provide detailed comments on how this could impact America's research enterprise.

Thank you for your consideration of this request.

Sincerely,



Barbara R. Snyder  
President