



American Association on Health & Disability

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AAHD - *Dedicated to better health for people with disabilities through health promotion and wellness*

July 13, 2026

The Honorable Russell Vought
Director, Office of Management and Budget
725 17th Street NW
Washington, DC 20503

**Re: Comments in Response to Proposed Revisions to Guidance for
Federal Financial Assistance (OMB-2026-0034)**

Dear Mr. Vought:

The American Association on Health and Disability and the Lakeshore Foundation appreciate the opportunity to provide comments on the Office of Management and Budget's (OMB) proposed rule amending the Uniform Guidance for Federal Financial Assistance (2 C. F. R. Part 200). Set forth below are our concerns we have regarding these proposed rules and we would encourage OMB to not adopt them.

The American Association on Health and Disability (AAHD) (www.aahd.us) is a national non-profit organization of public health professionals, both practitioners and academics, with a primary concern for persons with disabilities. The AAHD mission is to advance health promotion and wellness initiatives for persons with disabilities. AAHD is specifically dedicated to integrating public health and disability into the overall public health agenda.

The proposed OMB rule on the regulation of federal financial assistance would impact our organization, our research partners, and the critical field of disability and health research. Our concerns are itemized as follows:

Limitations on authorized use of Federal award funds – The National Institute on Minority Health and Health Disparities (NIMHD) under NIH recognized people with disabilities as a health disparities population in 2023. This hard-won designation came from researchers and advocates calling for federal and state public health support that could meet community health needs facing individuals with disabilities. “Diversity, equity, inclusion, and accessibility” (DEIA) policies, principles, and practices are the foundation of work done in the disability community. The basic principle within the DEIA framework is that the health needs of all communities must be understood, so that they can be properly addressed. Research has already shown that people with disabilities are facing health disparities due to avoidable economic, social, and environmental disadvantages. Researchers must be able to name these challenges accurately in

order to propose interventions that address them with the efficient and thoughtful use of our public funds.

Federal antidiscrimination laws require the federal government to affirmatively address disparities facing the disability community. These laws include the Rehabilitation Act of 1973, the Americans with Disabilities Act (ADA), the Individuals with Disabilities Education Act and the Workforce Innovation and Opportunity Act. The programs envisioned in these laws require an ongoing, sustained commitment to DEIA and therefore becomes a critical part of funding determinations. The heart of the DEIA framework is a public priority for research and policy. With the limitation that is being envisioned by these proposed rules, disability organizations who receive federal funding authorized by the above statutes will be in the untenable position of trying to do what is required by these laws which would be in contrast to the prohibition against doing DEIA work. OMB should reconsider this prohibition as it is in direct contradiction to the long line of nondiscrimination statutes protecting people with disabilities.

Aligning Federal Programs with Administration Priorities. One of the major concerns we have for the proposed rules is their attempt to require federal agencies to design and administer programs in ways that “align with administration policies and priorities.” Under the proposal, agencies would be encouraged to evaluate awards based not only on statutory requirements established by Congress but also on whether projects advance current presidential priorities and the “national interest.” This shifts federal grantmaking away from congressionally authorized objectives and toward political priorities that may change with each administration. This exceeds Congress’s constitutional power to authorize spending and could lead to instability in federally funded programs.

From a disability rights perspective, this approach creates significant uncertainty for programs serving people with disabilities. Many disability-focused initiatives such as independent living services, supported employment programs, accessible transportation projects, inclusive education efforts, and community-based supports, depend on predictable federal funding and long-term planning. If funding decisions become increasingly tied to an administration’s evolving policy preferences rather than the statutory purposes established by Congress, disability organizations may face greater difficulty sustaining programs that require multi-year investments and stable partnerships.

The proposal is particularly concerning because disability policy has historically been grounded in civil rights protections that transcend partisan administrations. Laws such as the Americans with Disabilities Act (ADA), the Rehabilitation Act, and the Individuals with Disabilities Education Act (IDEA) were enacted to guarantee equal participation and access regardless of shifting political priorities. By embedding administrative priorities into grant selection and oversight processes, the proposed rule risks creating a framework in which programs serving marginalized populations, including people with disabilities, are evaluated through a political lens rather than a lens which focuses on the original congressional intent with these programs.

Ultimately, the proposed rule reflects a broader shift from a model of federal assistance rooted in statutory obligations and civil rights protections toward one that grants greater weight to executive policy preferences. This move creates vagueness in these grant opportunities that will make it difficult for grant applicants to adequately assess what they should propose if the

statute requires one thing but “administration priorities” require something else. This shift raises concerns about stability, accountability, and equal opportunity. Federal disability programs should be guided by the rights and needs of disabled Americans, not by priorities that may fluctuate from one administration to the next. Preserving that distinction is essential to ensuring that disability policy remains grounded in equity, inclusion, and the long-term commitments embodied in federal civil rights law. As such, we oppose the proposal and encourage OMB to maintain the current practice of making funding decisions based on peer review and the authorizing legislation for the program being considered.

Publication and Conference Costs. We disagree with the idea that “Publication costs are not inherently necessary to carry out the core programmatic objectives of most Federal awards.” Public access is a requirement of federally funded research, as outlined in the 2022 Office of Science and Technology Policy memorandum to ensure free, immediate, and equitable access to federally funded research. While the rule change allows publication costs on a case-by-case basis, it should be allowable for all awards to cover open access fees in order to meet the OSTP requirement. This contradiction must be resolved before this rule is finalized. Without dedicated funds to put toward open access fees, the cost would be prohibitive to most researchers. The cost to publish open access in AAHD’s *Disability and Health Journal* amounts to a total of \$4,750 plus taxes, for example. Open access funding ensures that the American public can benefit from the research that we’ve made possible with our tax dollars.

Similarly, conducting conference presentations is another critical part of the research process. Engaging colleagues at relevant conferences to present the research and receive meaningful feedback is a critical part of the entire research process. These discussions can also lead to refinement in future research projects so the research field as a whole is able to better identify problems and solutions to the issues that face all of us. Research is not meant to simply live on its own, but it is meant to be disseminated and engaged to foster an environment where the field can be advanced. The proposed rules would create a significant barrier to this process and for that reason, we encourage OMB to not proceed with this limitation.

In conclusion, we would urge OMB to not adopt the proposed rules. We believe these rules will lead to an undermining of federal research in agencies such as NIH and NIDILRR – both agencies which provide significant funding to disability research. AAHD is a member of the Disability and Rehabilitation Research Coalition (DRRC) and we joined their comments on these rules as well and echo what they said, “[T]his proposed rule would fundamentally alter longstanding principles that have governed federal research funding for decades. Collectively, the proposed changes included in this proposed rule threaten to undermine the stability, independence, and effectiveness of the federal research enterprise ...”. Thank you for the opportunity to comment. If you have any questions, please contact Karl Cooper at kcooper@aahd.us.

Sincerely,



Karl D. Cooper, Esq.

Executive Director

American Association on Health and Disability