



July 13, 2026

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

Re: Regulation for Federal Financial Assistance
91 Fed. Reg. 32198 (May 29, 2026)

Dear Director Vought:

The undersigned national law enforcement organizations appreciate the opportunity to comment on the Office of Management and Budget's (OMB) proposed *Regulation for Federal Financial Assistance*.

Collectively, our organizations represent state and local law enforcement agencies, prosecutors, and public safety professionals responsible for protecting communities across the country. Our members work in partnership with federal agencies to prevent and investigate crime, prosecute cases, strengthen homeland security, support intelligence and information sharing, and respond to emerging public safety threats. Federal financial assistance is intended to support - not supplant - state, local, Tribal, and territorial investments in public safety. Federal grant programs support personnel, technology, training, multijurisdictional partnerships, emergency preparedness, victim services, and other operational capabilities that strengthen these efforts.

We appreciate OMB's commitment to strengthening accountability, transparency, and stewardship of federal taxpayer resources. Effective grant administration requires both strong oversight and a predictable, practical framework that enables state and local agencies to responsibly implement federal investments. As OMB considers next steps in this rulemaking, we respectfully offer the following recommendations regarding the provisions most likely to affect the administration of federal public safety grants.

Preserve Predictability in Federal Grant Administration

Public safety agencies make significant operational, financial, and staffing decisions based on approved federal awards. Agencies hire personnel, enter into contracts, purchase equipment and technology, establish multijurisdictional partnerships, and commit state and local resources in support of federally supported initiatives. These investments are often implemented over multiple years and require a stable, predictable grant administration framework.

Federal agencies already exercise substantial discretion when establishing program priorities, issuing Notices of Funding Opportunity, evaluating applications, and selecting recipients. That competitive process provides the appropriate opportunity to ensure awards align with congressional intent, program objectives, and Administration priorities. Once an award has been made, introducing authority to terminate a project based on subsequent changes in federal priorities would reduce predictability, complicate long-term planning, and undermine the stability necessary for recipients to successfully implement approved projects.

Retaining the existing post-award termination framework would preserve strong federal oversight while providing recipients with the certainty necessary to responsibly administer federal awards and carry out the public safety objectives for which those awards were made.

Recommendation: Retain the existing framework governing post-award termination and continue limiting termination to established circumstances such as noncompliance, failure to perform, mutual agreement, or other recognized legal authorities.

Preserve the Federal-State-Local Partnership

Federal public safety grant programs have historically succeeded because they balance congressional intent, federal priorities, program objectives, and locally identified public safety needs. State, local, tribal, and territorial agencies are often the first to identify emerging threats affecting their communities and possess the operational expertise necessary to develop effective responses. We encourage OMB to preserve this longstanding partnership as it finalizes the proposed rule.

Competitive grant programs should continue to be administered through transparent, objective, and merit-based processes. Expanded applicant screening, risk assessments, and award reviews should remain tied to statutory requirements, program objectives, and clearly defined evaluation criteria. Maintaining consistent, predictable award processes will strengthen confidence in the integrity of federal grant programs while ensuring recipients remain responsive to both national priorities and locally identified operational needs.

Recommendation: Preserve the longstanding partnership between federal priorities and locally identified public safety needs, maintain transparent and merit-based award processes, and ensure applicant screening and risk assessments remain objective, clearly defined, and consistently applied.

Maintain Practical Grant Administration While Preserving Accountability

The undersigned organizations support strong stewardship of federal taxpayer resources and recognize the importance of appropriate oversight, financial accountability, and responsible grant

administration. At the same time, oversight should remain practical and proportionate to the operational realities of administering federal public safety grants.

Collectively, the proposed changes affecting pass-through entities, fixed-amount subawards, documentation requirements, procurement, allowable costs, equipment purchases, applicant oversight, and grant administration could substantially increase the administrative responsibilities associated with implementing federal awards. While each proposed change may appear modest in isolation, together they would require recipients to devote additional personnel and resources to compliance activities rather than implementing federally supported public safety initiatives.

Many public safety agencies administer multiple federal awards with limited administrative staff. Additional documentation, procurement reviews, reimbursement requirements, equipment approvals, monitoring activities, and audit preparation all require time and resources that would otherwise support program implementation. These impacts are particularly significant for smaller agencies and pass-through entities, where grant administration often falls on a limited number of employees.

We also encourage OMB to consider the operational implications of proposed changes affecting conferences, publications, memberships, subscriptions, and Training and Technical Assistance (TTA). These activities are integral to many DOJ and DHS grant programs, supporting professional development, the dissemination of best practices, multijurisdictional coordination, and the successful implementation of federally funded initiatives.

Finally, we encourage OMB to ensure that recipient responsibilities are supported by clear, objective, and administrable standards. Requirements that rely on subjective terms or undefined expectations may create uncertainty, increase compliance costs, and result in inconsistent implementation across awarding agencies. Providing objective standards will help recipients understand their responsibilities while promoting consistent and effective grant administration.

Recommendation: Maintain administrative flexibility while ensuring strong accountability; preserve practical procurement and grant administration requirements; clarify recipient and pass-through responsibilities; retain sufficient flexibility for TTA activities; and ensure documentation, allowable cost, and oversight requirements remain appropriately tailored to programmatic and financial risk.

Continue Stakeholder Engagement Before Finalizing the Rule

The proposed rule represents the most significant revision to the federal grants framework in more than a decade. Given the scope of the proposed changes and their potential operational impact, we urge OMB not to finalize the proposed rule in its current form. Instead, OMB should continue engaging with state, local, Tribal, and territorial recipients, federal awarding agencies, and other stakeholders to ensure the final regulation reflects the operational realities of administering federal public safety grants.

Collectively, the proposed revisions would substantially affect the administration of federal financial assistance across thousands of recipient organizations. For public safety agencies,

effective grant administration is not simply an administrative function - it directly supports law enforcement, emergency management, homeland security, corrections, victim services, and other critical public safety capabilities. Additional consultation with the organizations responsible for administering these programs on a daily basis will help identify unintended consequences, clarify operational impacts, and ensure the final framework strengthens accountability while remaining practical, consistent, and administrable.

Consistent implementation across federal awarding agencies will also be essential. Public safety agencies routinely administer grants from multiple federal departments and components. Consistent guidance, uniform interpretation, and coordinated implementation will reduce unnecessary administrative burden, allowing recipients to focus their limited resources on delivering federally supported public safety programs rather than navigating inconsistent compliance requirements.

Recommendation: Continue consulting with state, local, Tribal, and territorial recipients, federal awarding agencies, and other stakeholders, and revise the proposed rule to address operational concerns before issuing a final regulation. Following publication of a revised final rule, provide sufficient implementation time, comprehensive guidance, technical assistance, and coordinated government-wide implementation to support successful adoption.

Conclusion

The federal-state-local partnership has long been one of the greatest strengths of the nation's public safety grant system. Federal financial assistance enables state, local, Tribal, and territorial agencies to build and sustain the personnel, technology, training, forensic science capabilities, victim services, emergency preparedness, and other operational capabilities necessary to protect their communities. Preserving the effectiveness of these programs requires a grants framework that strengthens accountability while remaining practical, flexible, and responsive to the operational realities of administering federal public safety grants.

The undersigned organizations support OMB's goal of improving the government-wide grants framework. However, given the breadth and significance of the proposed revisions, we respectfully urge OMB to continue engaging with state, local, Tribal, and territorial recipients, federal awarding agencies, and other stakeholders and to substantially revise the proposed rule before issuing a final regulation. Doing so will help address operational concerns, reduce unintended consequences, and ensure the final rule strengthens accountability while supporting the effective delivery of federally funded public safety programs.

Thank you for considering these comments. We appreciate the opportunity to participate in this important rulemaking and look forward to continuing to work with OMB to develop a final grants framework that supports both strong stewardship of federal taxpayer resources and the public safety agencies that administer these critical federal investments.

Sincerely,

Association of State Criminal Investigative Agencies (ASCIA)
Major Cities Chiefs Association (MCCA)

Major County Sheriffs of America (MCSA)
National Alliance of State Drug Enforcement Agencies (NASDEA)
National District Attorneys Association (NDAA)
National Fusion Center Association (NFCA)
National Narcotic Officers' Associations' Coalition (NNOAC)
National Sheriffs' Association (NSA)