

June 15, 2026

Russell Vought
Director
Office of Management and Budget
Executive Office of the President
Attention: OMB-2026-0034
725 17th Street, NW
Washington, DC 20503

RE: Extension of Comment Period; Regulation for Federal Financial Assistance

Dear Director Vought:

The American Geriatrics Society (AGS) appreciates the opportunity to participate in the rulemaking and implementation process for the Regulation for Federal Financial Assistance proposed by the Office of Management and Budget (OMB). AGS believes the current 45-day comment period is insufficient and does not allow commenters the time needed to review, analyze, and provide meaningful comments on OMB's proposed substantive changes to federal grantmaking. We strongly urge OMB to extend the comment period by 45 days for a total 90-day comment period.

AGS is a not-for-profit society devoted to improving the health, independence, and quality of life of all older adults. Our 6,000+ members include geriatricians, geriatrics nurse practitioners, social workers, family practitioners, physician associates, pharmacists, and internists who are pioneers in serious illness care for older individuals, with a focus on championing interprofessional teams, eliciting personal care goals, and treating older people as whole persons. AGS is an anti-discriminatory organization. We believe in a society where we all are supported by and able to contribute to communities and where bias and discrimination no longer impact healthcare access, quality, and outcomes for older adults and their care partners. AGS advocates for policies and programs that support the health, independence, and quality of life of all of us as we age.

We appreciate OMB's intent to make improvements in federal grantmaking for the benefit of the American public, including our collective health and well-being across the lifespan. OMB proposes substantial changes to Title 2 of the Code of Federal Regulations (CFR) with amendments to 91 parts across 456 sections and the addition of 52 new subsections that would have a lasting and far-reaching government-wide impact, affecting hundreds of federal agencies, subagencies, and departments. These changes, if finalized, would have significant implications for all Americans – from health care to economy to energy and more. Furthermore, the proposed rule did not appear on the Unified Agenda of Federal Regulatory and Deregulatory Actions and there were no requests for an Executive Order (EO) 12866¹ meeting. Both of these would have allowed opportunities to review the proposed regulatory action prior to formal issuance, contributing to a lack of awareness about the proposal among communities.

¹ Regulatory Planning and Review. 3 CFR 638 (1994)

Under EO 12866 Section 6(a)(1), the guidelines and responsibilities for agencies applicable to all regulatory actions, state that prior to the issuance of a notice of proposed rulemaking, agencies “where appropriate, seek the involvement of those who are intended to benefit from and those expected to be burdened by any regulation.” The EO goes on to state that agencies “should afford the public a meaningful opportunity to comment on any proposed regulation, which in most cases should include a comment period of not less than 60 days.”¹ Moreover, opportunities for meaningful and effective public engagement in rulemaking efforts are essential for accountability and legitimacy under the Administrative Procedure Act.^{2,3} It is critically important that OMB have access to the valuable information produced from public comments during this rulemaking process, ensuring that the knowledge and expertise of stakeholders help inform regulatory solutions.

Given this regulation’s complexity and far-reaching implications — particularly on the American public’s ability to maintain health and quality of life as we age — AGS strongly urges OMB to extend the comment period to 90 days to allow for a thorough and holistic public response.

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Thank you for the opportunity to submit this request. For additional information or if you have any questions, please do not hesitate to contact Anna Kim at akim@americangeriatrics.org.

Sincerely,



Alison A. Moore, MD, MPH, FACP, AGSF
President



Nancy E. Lundebjerg, MPA
Chief Executive Officer

² Pub L No. 79-404, 60 Stat 237.

³ Sant’ Ambrogio M, Staszewski G. Public Engagement with Agency Rulemaking Final Report. Administrative Conference of the United States. November 19, 2018. Accessed June 11, 2026. <https://www.acus.gov/document/public-engagement-rulemaking-final-report>