

# Possible Talking Points for Comments to OMB on Proposed Changes to 2 CFR Part 200

*These talking points are provided as a general resource to help association leaders evaluate the proposed OMB rule and organize their own comments. They have not been reviewed or approved by the MSAE Board of Directors and should not be understood as MSAE's official position. Association leaders are encouraged to review the proposed rule independently, consult appropriate advisors as needed, and adapt their comments to reflect their organization's mission, members, operations, and specific concerns.*

## **General**

- [Association name] supports accountability, transparency, and responsible stewardship of federal funds. However, the proposed restrictions on association memberships, professional subscriptions, conferences, and publication costs are broader than necessary and could weaken grant performance by limiting access to the very resources that help recipients comply, learn, and deliver results.
- Federal grant recipients need timely access to technical guidance, professional education, standards, peer learning, current research, and implementation support.
- OMB should preserve reasonable allowability for these costs when they are necessary, allocable, documented, and connected to the purposes or performance requirements of a federal award.

## **Memberships and Subscriptions — [200.454]**

- Association membership is not a perk. For many grant-funded professionals, it is a practical source of compliance guidance, technical education, standards interpretation, research, and peer-to-peer problem solving.
- Current Uniform Guidance recognizes the allowability of memberships in business, technical, and professional organizations, as well as subscriptions to business, professional, and technical periodicals. The proposal would significantly narrow that treatment. [1]
- Associations are part of the public-purpose infrastructure the government often relies on to advance research, disseminate trusted information, set standards, support implementation, and protect public safety. Federal policy already recognizes the value of voluntary consensus standards bodies and encourages federal agencies to use and participate in those bodies when doing so serves public objectives, including health and safety. [2]
- Many grant-funded fields depend on associations for rapid interpretation of rule changes, implementation guidance, sample policies, model practices, continuing education, and communities of practice.
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- Requiring prior written approval for every membership or subscription creates an unnecessary administrative burden for both recipients and federal agencies.
- OMB should allow memberships and subscriptions when they directly support award performance, compliance, technical competence, required credentials, research translation, or responsible administration of federal funds.
- OMB should permit approval through the approved budget, budget narrative, notice of funding opportunity, or general award terms—rather than strictly through individualized, case-by-case approvals after an award is made.

## **Conferences — [200.432]**

- Associations are America’s primary source of post-college education and training, and more than 80% of associations provide professional development and training programs. For many workers, association conferences are where essential post-college training and skill development occurs. [3]
- Conferences are often concentrated technical education, not discretionary travel.
- Current Uniform Guidance already limits allowable conference costs to events whose primary purpose is to disseminate technical information and that are necessary and reasonable for successful performance under the federal award. [4]
- The proposed rule would add a new requirement that conference attendance be expressly approved by the agency and included in the terms and conditions of the award. That could prevent recipients from attending timely, relevant training that emerges after an award is issued. [5]
- Many conferences provide direct grant-related value: regulatory updates, technical training, implementation strategies, evaluation methods, safety guidance, ethical standards, and peer learning from similarly situated recipients.
- OMB should focus on whether the conference content is reasonable, allocable, and connected to award performance—not whether the specific event was known and named at the time of award.
- OMB should allow recipients to document the grant-related purpose of conference attendance through agendas, session descriptions, learning objectives, post-event reports, supervisor approval, or inclusion in an approved professional development plan.

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## **Professional Publications and Periodicals — [200.454 and 200.461]**

- Professional publications are often the fastest and most cost-effective way for grant-funded staff to stay current on standards, research, regulatory changes, and emerging practices.
- A categorical ban on business, professional, academic, and technical periodicals could cut recipients off from information they need to perform federally funded work responsibly.
- The proposal would also make many publication costs, including page charges and article processing charges for professional journals and peer-reviewed publications, unallowable unless specifically required by statute or approved in advance by the agency. [6]
- This creates tension with federal public access policy, which increasingly emphasizes broad access to federally funded research and reasonable costs associated with publication and data management.
- OMB should not categorically disallow professional periodicals or reasonable publication costs when they support award performance, dissemination, compliance, research integrity, or public access to federally funded work.

## **Issue Advocacy and Association Purpose**

- OMB should clearly distinguish between lobbying, unrelated issue advocacy, and legitimate association activities such as education, standards development, regulatory interpretation, policy analysis, professional guidance, and public-interest research.
- Many associations engage in some policy education or advocacy while also providing substantial education, credentialing, standards, research, technical assistance, and professional development.
- The phrase “primary purpose is issue advocacy” should be clearly defined and applied at the organizational level, not triggered by isolated activities, occasional public policy work, or member education about public issues.
- Without clear definitions, recipients may avoid valuable association resources out of fear that membership costs will later be questioned.

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## **Practical Impact on Federal Grant Recipients**

- The proposal could unintentionally reduce access to training, technical assistance, and current information for the very organizations responsible for delivering federally funded services.
- Smaller recipients may be most affected because they often rely on associations for affordable expertise they cannot maintain in-house.
- Federal agencies may also face added administrative burden if every membership, subscription, conference, or publication cost requires individualized prior approval.
- Existing cost principles—reasonableness, allocability, necessity, documentation, and award nexus—already provide tools to prevent misuse without broadly restricting access to professional resources.

## **Recommended Requests to OMB**

- Retain allowability for professional, business, civic, and technical memberships when they support award performance, compliance, required credentials, technical capacity, research, dissemination, public safety, or responsible administration.
- Retain allowability for professional, academic, business, and technical periodicals when they support grant-related work.
- Allow conference attendance when the recipient can document a direct relationship to the award, even if the specific conference was not named in the original award terms.
- Permit approval through budget narratives, approved budgets, general award conditions, or agency guidance rather than requiring separate prior approval for each cost.
- Clarify that education, standards development, credentialing, regulatory guidance, policy analysis, research dissemination, and member technical assistance are not “issue advocacy” merely because they relate to public policy.
- Preserve reasonable publication costs when needed to disseminate federally funded research, comply with public access requirements, or advance the purposes of the award.

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## Closing

- Accountability and professional capacity should work together. Federal grant rules should prevent misuse of funds without cutting recipients off from the memberships, publications, conferences, and professional communities that help them comply, learn, and deliver better public outcomes.

## Comment Procedure

- Submit comments by July 13, 2026.
- Submit electronically through Regulations.gov.
- Search for docket OMB-2026-0034.
- Begin each comment with the relevant section number in brackets, such as [200.432], [200.454], or [200.461].
- Do not include confidential business information or personal private information, because comments will be posted publicly. [7]

## Footnotes

[1] Current Uniform Guidance allows certain membership, subscription, and professional activity costs under 2 CFR § 200.454. See [2 CFR § 200.454, Memberships, subscriptions, and professional activity costs](#).

[2] OMB's proposed rule, *Regulation for Federal Financial Assistance*, describes proposed changes to 2 CFR Part 200, including restrictions on memberships, subscriptions, conferences, and publication costs; provides the July 13, 2026 comment deadline; and identifies docket OMB-2026-0034. See [Federal Register, Regulation for Federal Financial Assistance](#).

[3] OMB Circular A-119 states federal policy on using and participating in voluntary consensus standards bodies. See [OMB Circular A-119, Federal Participation in the Development and Use of Voluntary Consensus Standards](#).

[4] ASAE states that associations are "America's primary source of post-college education and training." See [ASAE Power of Associations: Workforce Development](#).

[5] Current Uniform Guidance allows conference costs when the primary purpose is disseminating technical information and the costs are necessary and reasonable for successful award performance. See [2 CFR § 200.432, Conferences](#).

[6] Current Uniform Guidance addresses publication and printing costs, including certain publication and article processing charges. See [2 CFR § 200.461, Publication and printing costs](#).

[7] OSTP's public access policy directs federal agencies to update policies to make federally funded research publications publicly accessible without embargo and addresses reasonable publication and data-management costs. See [OSTP Memorandum, Ensuring Free, Immediate, and Equitable Access to Federally Funded Research](#).