



July 30, 2026

Alamo Colleges District

Dallas College

Lone Star College

Louisiana Community and
Technical College System

Metropolitan Community
College

Tarrant County College

Virginia Community College
System

Wisconsin Technical College
System

Andrew Reisig and Joel Savary
U.S. Office of Management and Budget
725 17th Street NW
Washington, DC 20503

Dear Mr. Reisig and Mr. Savary,

On behalf of Rebuilding America's Middle Class (RAMC), I am writing to provide public comment on the U.S. Office of Management and Budget's (OMB) proposed rule to revise the Guidance for Federal Financial Assistance. This set of rules, known as the Uniform Guidance, governs Federal grants, cooperative agreements and other monetary awards that RAMC community colleges receive. RAMC is focused on ensuring that its community colleges are operationally able to serve students effectively and RAMC believes that this rule will have a negative impact on this goal.

RAMC represents more than 75 community colleges and approximately 1 million students nationwide. Community colleges serve 45 percent of all first-time freshmen and 40 percent of our students are first-generation college students. Community colleges are open access, seeking to make higher education accessible and affordable for everyone and match employers' need for a larger, more skilled workforce. To meet this need, RAMC is committed to ensuring that students have access to the financial aid that they need to be able to access a community college education. An essential part of making this happen is preserving the ability of community colleges to easily and efficiently access essential Federal funding. This funding, along with institutional, State and other funding streams, allows RAMC's colleges to help students chart a path to the middle class.

Awards from the Federal government play a significant role in enabling students across the nation, including those served in our community colleges, to access higher education. RAMC is concerned that the current proposed rule would limit colleges' ability to manage grants, meet priorities and equip students with the skills needed to reach employment and contribute productively to the workforce. RAMC urges OMB to consider changes to the following aspects of the proposed rule.

- RAMC is concerned about the changes which allow Federal agencies to terminate active grants (*§200.340(a)(2)*) with only a brief summary of the reasons for termination (*§200.341(c)*). This section provides an expanded discretionary authority for a Federal award to be terminated in part or its entirety if the agency determines it is inconsistent with program goals or agency priorities. RAMC is concerned with this change as our community colleges often rely on multi-year Federal funding streams to operate effectively and serve

students. These proposed alterations would create uncertainty around funding and threaten the future of long-term services. This could mean that community colleges are suddenly left without critical funding streams, which then would prevent them from being able to serve their students effectively. Further, the lack of clarity around the reasons for termination makes it difficult for community colleges to make alterations when applying for funding to serve students. A brief summary of the reasons for any grant termination does not serve the public interest in ensuring that community colleges are well positioned to apply for and use grant funds in a manner that provides certainty of funding and program operation. Overall, this provision would operationally make it more difficult for community colleges to rely on essential Federal funding as part of their processes and therefore hamper their ability to most effectively serve students seeking the education and training to secure employment. RAMC urges that these provisions be dropped in any final rulemaking.

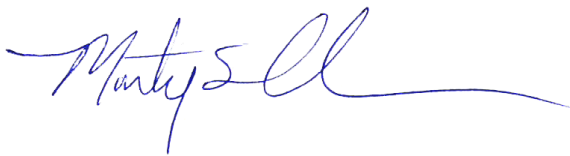
- RAMC also urges OMB to reconsider proposed alterations to how peer review is utilized in grant determinations (§200.205). These changes would create an additional mandatory review process led by senior appointed officials of the Federal agency, who would prioritize alignment with the current Administration's policy priorities. RAMC is concerned that this additional review by senior political leadership would undermine the current non-partisan peer review process. Further, the changes in this section dictate that with each change in Administration, the criteria by which awards are selected could also change. This will make it even more challenging for community colleges to effectively apply for grants and rely on consistent streams of funding. Instead, the current objective and non-partisan peer review process allows colleges to focus on applying for awards that best serve their students without having to worry about changing their goals each time an Administration's priorities change.
- RAMC is also concerned about the proposed alterations to public communication and advocacy involvement (§§200.421, 200.450). These sections restrict the use of Federal award funds for advertising and public relations, with only few exceptions. RAMC believes the proposed changes would restrict our colleges' ability to raise awareness for successful initiatives and programs at our institutions. RAMC prioritizes ensuring students have access to and are aware of high-quality programs which set them up with future employment opportunities; the changes in the rule will make it significantly more difficult for this to happen. RAMC believes the proposed restriction on advertising will have negative impacts on the communication of best practices among community colleges, which allows students across the U.S. to receive the best educational opportunities. RAMC urges that these provisions be dropped in any final rulemaking.
- RAMC also urges OMB to reconsider the proposed alterations to conference attendance (§200.432(b)). This section asserts that conference attendance is permitted using Federal award funds only if there is express approval by the Federal agency as determined in the terms and conditions of the Federal award. RAMC's mission is to serve every student who wishes to attend community college, gain an education and then enter the workforce. RAMC believes that this proposed rule would restrict the ability of individuals to attend professional development conferences; these conferences are foundational to providing them with the tools necessary to serve every student. RAMC also believes that restrictions on Federal funds could hinder potential innovation within community colleges, especially when new conferences are announced without sufficient notice to gain approval.
- RAMC is finally concerned about the restrictions placed on memberships, subscriptions and publication costs (§§200.454, 200.461). These sections prohibit the use of Federal award funds for membership costs in organizations whose primary purpose is issue advocacy. Further, they only permit the use of Federal awards funds for membership costs, journal subscriptions or article

publications if there is prior written approval by the Federal agency. Memberships, journal subscriptions and article publications provide community colleges with critical insights from the field and a platform to share progress with others to ensure that the services provided to students are innovative and aligned with best practice. RAMC believes that placing limitations on participation in these key aspects of school improvement would have a negative impact on the quality of community colleges and therefore on student outcomes and workforce placement. RAMC urges that these provisions be dropped in any final rulemaking.

RAMC strongly urges OMB to reconsider the above sections of proposed changes to the Uniformed Guidance. Without any changes, the proposed alterations will limit professional development opportunities, reduce communication among the field of best practices and place long-term funding streams at risk, all of which are critical to ensuring that our students learn the necessary skills to chart a path to the middle class and contribute productively to the workforce.

Thank you for your consideration of RAMC's views.

Sincerely,

A handwritten signature in blue ink that reads "Monty Sullivan". The signature is fluid and cursive, with a long horizontal flourish extending to the right.

Monty Sullivan

Board President, Rebuilding America's Middle Class (RAMC)
Former President, Louisiana Community and Technical College System