July 13, 2026
OMB-2026-0034, Office of Management and Budget (OMB) Regulation for Federal Financial Assistance

To Whom It May Concern,

Thank you for the opportunity to provide comments on the proposal from the Office of Management and Budget (OMB) to revise the Guidance for Federal Financial Assistance (OMB-2026-0034).

The North Carolina Coalition on Aging (NCCOA) is comprised of provider, advocacy, and consumer organizations/agencies plus individual supporters who work collaboratively to give voice to issues that affect older North Carolinians. The mission of NCCOA is to improve the quality of life for older adults through collective advocacy, education, and public policy work.

North Carolina's older adult population is increasing; as is this segment of the population in the rest of the United States. We interact with many nonprofit organizations serving aging and older adults in North Carolina that rely on federal grants to provide necessary services such as housing support, long-term care services, support for caregivers, access to health care to improve health outcomes, and more. Therefore, we want to ensure that revised regulations for Federal Financial Assistance do not adversely affect older adults relying on nonprofits for services and supports as they age with dignity and respect in their communities.

[200.202(f)] We appreciate the consideration of multi-year grants as this allows smaller grantees, many of whom are located in rural communities, to continue the programming and services needed without disruption. Multi-year grants also allow smaller agencies to better address their staffing needs by providing more certainty regarding on-going funding which may be used to help support worker salaries. In addition, it can be a strain on agencies with smaller staff to go through the process of submitting grant applications on a yearly basis.

[200.340] We are concerned about the proposed policy to allow for the ability to terminate or suspend funds. We are concerned that suddenly stopping a grant that provides services and supports to older adults who rely on these services could be detrimental to their lives. A solution to continue direct support should be implemented before grants are terminated or suspended to ensure no adverse impacts on older and aging adults.

[200.432(b)] The provision on attending conferences should not place an undue burden of proof on nonprofit staff. For example, if a multiyear grant is awarded, a conference opportunity may not be known at the time of application. A process to allow staff to attend

a conference that advance program outcomes but are not known at the time of the grant application should be considered in a timely manner.

[200.450 (c)(1)(iv)] We believe more guidance should be given on the prohibition on the use of federal grant funds for public messaging on public policy. A better definition of public messaging must be included with final grant guidance. Nonprofits need to ensure that they are able to give voice to services that are needed without fear of violating the grant agreement.

Lastly, we are happy to see the proposed maintenance of three important provisions from 2024 including ensuring that nonprofits may receive a *de minimis* indirect cost rate of 15% of their modified total direct costs on their federal grants; setting the threshold for a single audit at $1 million in federal grants received; and ensuring that federal agencies' notices of funding opportunities are clearly worded.

Thank you for allowing comments on these regulations.

Sincerely,

North Carolina Coalition on Aging