The Colorado Health Foundation™

Comments on Proposed Rule OMB-2026-0034-0001 – Regulation for Federal Financial Assistance

Thank you for the opportunity to provide comments on the proposed rule, Regulation for Federal Financial Assistance, which would comprehensively amend the Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards ("Uniform Guidance"). The Colorado Health Foundation ("CHF" or "the Foundation") is a statewide, nonprofit and nonpartisan philanthropic organization with a mission to improve the health and well-being of Coloradans. Through community engagement, research, grantmaking, and private sector investments, the Foundation aims to ensure that everyone in Colorado has what they need to be healthy.

The Foundation strongly opposes the proposed revisions to the Uniform Guidance and respectfully urges the Office of Management and Budget (OMB) to withdraw this proposal in its entirety. As drafted, the proposal would fundamentally reshape federal financial assistance in ways that weaken evidence-based decision-making, increase uncertainty for recipients, and reduce the effectiveness of federal investments in public health and community well-being. Specifically, the proposed rule would:

- Limit efforts to identify and address health disparities [200.205, 200.206, 200.218, 200.300];
- Shift grantmaking from merit-based and evidence-driven decision making toward ideological and political considerations [200.202, 200.205, 200.206,

200.218, 200.300];
- Create instability and uncertainty for organizations receiving federal grants and for the communities they serve [200.340, 200.211, 200.205, 200.208]; and
- Undermine public health outcomes and exacerbate existing inequities [200.205, 200.218, 200.300].

If implemented, these changes would expose grantees to unpredictable financial, legal, and reputational risks, thereby increasing the costs of participating in federal programs and discouraging qualified organizations from applying. The resulting disruption would jeopardize essential services, including health care, behavioral health, housing, food assistance, education, and disaster recovery across the country.

Nonprofit organizations are indispensable partners to the federal government in delivering public services and strengthening community health, stability, and resilience. Across Colorado, nonprofits provide critical services including health care navigation, behavioral health care, food assistance, housing support, disaster recovery services, and early childhood programs. These organizations often serve rural and historically under-resourced communities where alternatives are limited. Federal grantmaking practices should strengthen, not weaken, recipients' ability to partner with government to better serve the public.

READ THE FULL LETTER

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Announcements

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BY

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