

June 10, 2026

Honorable Russell Vought  
Director, US Office of Management and Budget  
The White House  
Washington, DC 20500

Re: OMB guidance governing federal grants and cooperative agreements  
*Regulation Codifying Policies on Federal Financial Assistance, Revisions to*  
*2 CFR 91 Fed. Reg. 32198 (May 29, 2026)*  
Extension of Comment Period to August 27, 2026

Dear Director Vought:

On behalf of the American Society of Civil Engineers (ASCE) I am writing to ask for a 45-day extension to the comment period for the proposed rule by the Office of Management and Budget to revise Title 2 of the Code of Federal Regulations, published on May 29, 2026. Presently, comments are due July 13, 2026 and we ask that on or before June 30, 2026 a Federal Register Notice is published extending the comment period to August 27, 2026.

ASCE believes that the rule as proposed would be transformative and have a potentially negative impact on the ability of ASCE to carry out its mission to advance the science and practice of civil engineering. The rule will significantly alter the entirety of government grant-making across the United States, and it will take time for ASCE to properly understand and evaluate. A 45-day comment period is insufficient to allow a comprehensive analysis of the varied impacts needed to provide useful feedback to OMB.

A proposed rule of this magnitude warrants a full 90-day review period due to its complexity. Additionally, the proposal has never appeared on the Unified Agenda as regulatory action being undertaken by OMB. Its appearance has taken ASCE by surprise and our ability to provide comprehensive and thoughtful feedback will require time. The submission of substantive comments is fundamental to the rulemaking process under the Administrative Procedure Act (APA). At its core, the APA is about enhancing public engagement in rulemaking for the purpose of ensuring agencies receive the most comprehensive information possible to make rules. The APA provides

a transparent mechanism to gather vital technical expertise, industry data, and public feedback before finalizing regulations. This rigorous process does not just satisfy legal requirements; it builds an administrative record that serves as the agency's primary defense against court challenges.

ASCE looks forward to providing comprehensive comments on the proposed rule. The issues raised in the proposed rule will not only impact how ASCE carries out its mandate to serve not only the profession of civil engineering, but its ability to protect public health and safety. We appreciate your consideration of our request.

Sincerely,

A handwritten signature in black ink, appearing to read "Peter J. O'Neil". The signature is fluid and cursive, with a large initial "P" and "O".

Peter J. O'Neil, FASAE, CAE, M. ASCE  
Chief Executive Officer