



July 13, 2026

The Honorable Russell Vought  
Director  
Office of Management and Budget  
Washington, DC 20503

RE: Proposed Rule on Regulation for Federal Financial Assistance, Docket No. OMB-2026-0034

Dear Director Vought:

On behalf of the 46 undersigned organizations representing the Nursing Community Coalition (NCC), we appreciate the opportunity to comment on the Office of Management and Budget's (OMB) Notice of Proposed Rulemaking (NPRM), *Regulation for Federal Financial Assistance* [Docket No. OMB-2026-0034]. The Nursing Community Coalition (NCC) is a cross section of education, practice, research, and regulation within the nursing profession, representing Registered Nurses (RNs), Advanced Practice Registered Nurses (APRNs),<sup>1</sup> nurse leaders, boards of nursing, students, faculty, and researchers. As such, federal grant funding is critical to ensuring that our members can continue to educate the future nurses of America, grow the nursing workforce, and conduct essential research that improves our nation's health. After reviewing the proposed rule, the NCC is concerned that the proposed changes will increase the difficulty of our members fulfilling their core function of improving access to high-quality health care. **We respectfully request that OMB withdraw the proposed rule and preserve a federal grant system that supports scientific excellence, innovation, and the future of healthcare research.**

As mentioned above, federal grants have positively impacted the nursing workforce and supported nursing research that has contributed to improved health for our nation. For example, the Title VIII Nursing Workforce Development Programs help meet the nation's demand for nursing services by addressing all aspects of nursing education, practice, recruitment, and retention. Within Title VIII, the Nurse Education, Practice, Quality and Retention (NEPQR) programs supported over 10,300 nurses and nursing students and helped with the development, distribution, and retention of the nursing workforce.<sup>2</sup> Title VIII programs have provided critical workforce support to rural communities, as 72% of Advanced Nursing Education (ANE) recipients work in underserved areas, and 60% work in medically underserved and/or rural areas one year after graduation, resulting in "over 2 million hours of patient care and nearly 900,000 patient encounters occurred in medically underserved communities."<sup>3</sup> Grants supported by the National Institute of Nursing Research have led to the design of programs supporting parents of premature infants, which saved about \$5,000 per infant, research that improved the delivery

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<sup>1</sup> APRNs include certified nurse-midwives (CNMs), certified registered nurse anesthetists (CRNAs), clinical nurse specialists (CNSs) and nurse practitioners (NPs)

<sup>2</sup> Health Resources and Services Administration. Fiscal Year 2025 Budget Justification (2025). Pages 151-153. Retrieved from: <https://web.archive.org/web/20250308124649/https://www.hrsa.gov/sites/default/files/hrsa/about/budget/budget-justification-fy2025.pdf>

<sup>3</sup> Ibid, Pages 143-146.

of palliative care, and using electrocardiogram monitoring to predict outcomes in patients with acute coronary symptoms, among other breakthroughs.<sup>4</sup> Continued support for these, and other grant programs, provides significant value to the United States, and disruptions, increased burden, and uncertainty put these programs at risk.

While the stated intent of the proposed rule is to improve transparency and accountability, and to reduce burden within the federal grant process, many of these proposed changes will have the opposite effect. This proposal broadens the language for the termination of grants [2 CFR 200.340] and adds a new suspension process that is entirely at the agency's discretion [2 CFR 200.340]. These changes will increase uncertainty and instability within the grant process, which will negatively impact the current and future nursing workforce, nursing students, researchers, and scientists. For grant funding to be successful, it is essential that recipients be able to rely on stable funding to conduct long-term planning operations, hire essential staff, and ensure that they have the resources needed to successfully fulfill the requirements of the grant. By increasing the likelihood that grants could be terminated or suspended without cause, this rule could divert institutional resources away from research and education to compliance, disrupt long-term institutional planning, limit investment in research infrastructure and nursing education programs, and make it more difficult for schools of nursing to recruit and retain nurse scientists and research faculty.

For the reasons above, we request that OMB withdraw this proposed rule. The NCC is committed to working with OMB to improve the grant process by reducing burden and improving transparency, but this proposed rule is expected to have the opposite result by, in fact, making the federal grant process less transparent, more irregular, and less visible to taxpayers. Nurses continue to provide a growing proportion of care to patients across the nation, while simultaneously facing a workforce shortage with an aging population that requires increasing healthcare services. Strengthening the grant programs that support nursing education, workforce, and research is a key priority, and the nursing community is committed to ensuring that these programs are sustainable well into the future. Should you have any questions or if the Nursing Community Coalition can be of any additional assistance please contact the coalition's Executive Director, Rachel Minahan, at [rstevenson@thenursingcommunity.org](mailto:rstevenson@thenursingcommunity.org).

Sincerely,

Academy of Neonatal Nursing  
American Academy of Ambulatory Care Nursing  
American Academy of Emergency Nurse Practitioners  
American Academy of Nursing  
American Association of Colleges of Nursing  
American Association of Critical-Care Nurses  
American Association of Heart Failure Nurses  
American Association of Nurse Anesthesiology  
American Association of Nurse Practitioners  
American Association of Occupational Health Nurses  
American Association of Post-Acute Care Nursing

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<sup>4</sup> Grady PA. The National Institute of Nursing Research: A Glance Back, and A Vision for the Future. J Nurs Scholarsh. 2018 Nov;50(6):579-581. doi: 10.1111/jnu.12432. Epub 2018 Sep 22. PMID: 30242951; PMCID: PMC6219925. <https://pmc.ncbi.nlm.nih.gov/articles/PMC6219925/>

American College of Nurse-Midwives  
American Nephrology Nurses Association  
American Nurses Association  
American Organization for Nursing Leadership  
American Pediatric Surgical Nurses Association, Inc.  
American Public Health Association, Public Health Nursing Section  
American Society for Pain Management Nursing  
American Society of PeriAnesthesia Nurses  
Association of Community Health Nursing Educators  
Association of Nurses in AIDS Care  
Association of Pediatric Hematology/Oncology Nurses  
Association of periOperative Registered Nurses  
Association of Public Health Nurses  
Association of Rehabilitation Nurses  
Commissioned Officers Association of the U.S. Public Health Service  
Dermatology Nurses' Association  
Gerontological Advanced Practice Nurses Association  
International Society of Psychiatric-Mental Health Nurses  
National Association of Clinical Nurse Specialists  
National Association of Hispanic Nurses  
National Association of Pediatric Nurse Practitioners  
National Association of School Nurses  
National Black Nurses Association  
National Forum of State Nursing Workforce Centers  
National Hartford Center of Gerontological Nursing Excellence  
National League for Nursing  
National Nurse-Led Care Consortium  
National Organization of Nurse Practitioner Faculties  
Nurses Organization of Veterans Affairs  
NurseTRUST  
Oncology Nursing Society  
Organization for Associate Degree Nursing  
Society of Pediatric Nurses  
Society of Urologic Nurses and Associates  
Wound, Ostomy, and Continence Nurses Society