National Association of Local Long Term Care Ombudsman
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July 13, 2026

Re: 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 to revise several parts of OMB Guidance for Federal Financial Assistance located in Title 2 of the Code of Federal Regulations, (CFR), subtitle A (OMB-2026-0034, Office of Management and Budget (OMB) Regulation for Federal Financial Assistance).

NALLTCO represents more than 300 local and regional Long-Term Care Ombudsman Programs across the United States. Our members, also known as Ombudsman Representatives, provide direct advocacy services to residents of long-term care facilities and bring extensive, hands-on experience from diverse program settings, including state agencies, county and local governments, Area Agencies on Aging (AAAs), and nonprofit organizations. Our members are subject to Federal Financial Assistance.

As advocates for older adults living in long-term care facilities and receiving long-term services and supports, we understand the importance of transparency, accountability, and responsible stewardship of federal funds. However, the current proposal to change how Federal Financial Assistance is awarded, together with the provision allowing funding to be revoked after agreements have been executed, creates significant uncertainty for organizations that provide essential public services.

Long-Term Care Ombudsman Programs rely on Federal Financial Assistance to meet statutory responsibilities under the Older Americans Act. To provide these services, local programs must hire and retain qualified staff, recruit and train volunteers, maintain offices, and enter into contracts and other financial commitments. These are necessary and ongoing costs that cannot be paused or deferred when funding becomes uncertain. The proposed changes place these critical, cost-effective services at unnecessary risk.

We also encourage OMB to ensure that decisions regarding Federal Financial Assistance remain grounded in statutory purpose, demonstrated program effectiveness, fiscal accountability, and the needs of the populations Congress intended to serve. Grant-making processes should be applied consistently and predictably so that funding decisions are not subject to changing political priorities or evolving cultural perspectives. Stable, objective, and mission-focused criteria promote public confidence, allow service providers to plan responsibly, and help ensure that vulnerable populations continue to receive essential services regardless of changes in the broader political or social landscape.

We respectfully urge OMB to reconsider this proposal and to convene a bipartisan task force to evaluate how best to balance transparency, accountability, fiscal oversight, and the need for stable funding for programs serving vulnerable populations. Such a collaborative approach would help ensure that federal financial assistance remains fair, effective, and dependable for both recipients and the individuals they serve.

Thank you for considering our comments and recommendations.

Sincerely,



Karen Jones, Chair, NALLTCO Board of Directors