



July 13, 2026

The Honorable Russell Vought
Director, Office of Management and Budget
725 17th St NW Washington, DC 20503

Re: OMB Proposed Rule

Dear Director Vought,

Preservation Action appreciates the opportunity to submit the following comments in response to the Office of Management and Budget's proposed revisions to 2 CFR Part 200, published on May 29, 2026.

Preservation Action members and supporters include thousands of preservation advocates, professionals, developers, and community leaders across the country, including members in nearly every state who work directly with federal, state, and local partners to protect and revitalize historic places. Since our founding in 1974, we have served as the national voice for preservation advocacy—mobilizing citizens to engage with Congress and federal agencies on the policies that shape America's preservation system including safeguarding the Historic Preservation Fund (HPF) and the broader statutory framework of the National Historic Preservation Act (NHPA).

The HPF supports State Historic Preservation Offices (SHPOs), Tribal Historic Preservation Offices (THPOs), and several important competitive grant programs. Because this proposed rule would govern how every one of those dollars is administered, we have significant concerns about its cumulative effect on the preservation community. Our members rely on this important funding and therefore depend on stable and consistent federal grant administration.

The proposed revisions would grant the executive branch seemingly unlimited discretion over federal grants. This proposal would hand federal agencies considerably more latitude to condition, suspend, or terminate grant awards based on alignment with the priorities of whichever administration is in office at a given moment — rather than the statutory criteria and program goals Congress established when it appropriated the funds. SHPOs and THPOs rely on predictable, multi-year funding to carry-out their important work. Preservation outcomes are strongest when grants are awarded and administered against clear, stable statutory authority and program criteria, not against priorities that can change from one year to the next.

The proposed rule creates an uncertain environment and places additional burdens on grantees. The revisions require expanded documentation, monitoring, and reporting obligations. This would substantially increase administrative workload on SHPOs, THPOs, nonprofit organizations, and other preservation partners. HPF funding is already largely reimbursement-based, and these additional requirements risk slower reimbursements and

payment processing. Past delays in HPF apportionments have shown how quickly funding uncertainty translates into paused local projects and staffing instability.

The proposed revisions would base discretionary awards on partisan ideology. By tying award decisions to alignment with the priorities of the administration in office, the proposed rule risks making federal preservation funding contingent on political favor rather than merit and statutory eligibility.

The proposed rule imposes prohibitions on federal funding being used in diversity, equity, and inclusion (DEI) efforts. A core function of the NHPA is documenting and interpreting the full breadth of the American experience, including places associated with communities that have not always been proportionately represented in the National Register or in past preservation investment. We are extremely concerned that these proposed restrictions would discourage otherwise fully appropriate survey, nomination, or interpretive projects focused on historically underrepresented communities.

Preservation Action supports genuine efforts to improve transparency and accountability in federal grantmaking; the historic preservation community has long been a careful steward of the modest HPF appropriation. However the cumulative effect of unbounded discretion, added burden, politicized award decisions, and ambiguous content restrictions would undermine, rather than strengthen, federal grant administration. We urge OMB to revise the proposed rule to preserve clear statutory grounding for award decisions, minimize new burdens on capacity-constrained grantees, and remove ambiguity that could have a chilling effect on legitimate preservation work.

Thank you for the opportunity to comment. We welcome further engagement with OMB as this rulemaking proceeds.

Sincerely,



Russ Carnahan

President, Preservation Action