

July 13, 2026

Director Russel Vought

Office of Management and Budget

Attention: OMB-2026-0034

725 17th Street NW

Washington, DC 20503

Re: OMB-2026-0034, Office of Management and Budget (OMB) Regulation for Federal Financial Assistance

On behalf of the National Alliance for Caregiving (NAC), we appreciate the opportunity to comment on this proposed rule. NAC is a nonprofit coalition dedicated to conducting research, developing national programs, and advocating for policies that support family caregivers. Our flagship research series, *Caregiving in the U.S.*, produced in partnership with AARP and first conducted in 1997, is widely regarded as the most authoritative ongoing data resource on family caregiving in America. [The most recent edition, released in July 2025](#), found that 63 million Americans, are providing ongoing care for an older adult, someone with a serious illness, or a person with a disability – an increase of 20 million since 2015. NAC also conducts focused research on caregivers in specific contexts, including those supporting individuals with cancer, Alzheimer's disease, and other serious conditions, as well as research on the health, financial, and workplace impacts of caregiving.

Family caregivers are central to the nation's health and long-term care systems, yet the evidence base that documents their experiences remains chronically limited and depends heavily on federal support to exist at all. AARP's *Valuing the Invaluable 2026*, released in March 2026, estimates that family caregivers of adults provided 49.5 billion hours of unpaid care in 2024, with a total economic value of \$1.01 trillion. Producing the research that quantifies this contribution, and that informs policies to sustain it, depends on federal grant funding that is predictable and insulated from shifting political priorities. NAC and our research partners rely on federal grants and cooperative agreements to sustain *Caregiving in the U.S.* and related studies, work that is already difficult given how limited caregiver-specific data collection is across the federal government. The policies in this proposed rule have direct consequences for the stability of that research infrastructure and, in turn, for the ability of policymakers, health systems, and employers to understand and respond to the needs of family caregivers and the people they support.

NAC offers the following comments from a family caregiving research perspective:

Discretionary Termination, Political Review, and Shifting Grant Terms

NAC opposes the provisions granting federal agencies broad discretion to withhold, suspend, or terminate grants, or to change terms and conditions mid-performance, without a defined process for review or appeal. As a research authority on family caregiving, NAC's work is deeply intertwined with our nation's broader scientific enterprise. Subjecting grant funding to shifting political priorities, pre-award political review, and discretionary termination authority introduces instability that erodes the biomedical and social-science research workforce and stifles scientific discovery. Research institutions cannot hire and retain skilled staff, or sustain multi-year studies and data infrastructure, if a grant that is

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fully compliant with its terms can be withheld indefinitely or terminated without notice. This instability ultimately harms both patients and the family caregivers who support them.

Prohibition on Disparate Impact Analysis (§ 200.218) and DEI-Related Restrictions (§ 200.300)

NAC opposes the restrictions on research methodology in the proposed rule. Caregiving is not a uniform experience. To be scientifically sound, caregiving research must examine all caregivers: rural and urban, younger and older, higher and lower income, and across every family circumstance in which care is provided. The analytical tools targeted by the proposed rule are how NAC and our partners identify which caregivers are falling through the cracks and why, whether that is a farm family far from respite services, a working parent caring for both children and aging parents, or a grandparent raising grandchildren on a fixed income. Restricting these tools would not make the resulting research more neutral, only less complete. Research that cannot capture the full range of caregiver experiences cannot produce solutions that reach the families who need them most.

Requested Action

NAC respectfully requests that OMB remove both § 200.218 (the prohibition on disparate impact analysis) and § 200.300 from the final rule. Absent their removal, NAC urges OMB to withdraw the broader proposal and preserve the current Uniform Guidance framework, which allows federal agencies and grantees to make award decisions based on objective criteria, community need, and congressional intent rather than shifting political priorities.

Thank you for the opportunity to comment on this proposed rule. If you have questions, please contact Blaire Bryant at Blaire@caregiving.org.

Sincerely,

Jason Resendez
President & CEO
National Alliance for Caregiving