



NATIONAL BOARD FOR
CERTIFIED COUNSELORS®

PROPOSED RULE CHANGE INFO

KEEPING COUNSELORS INFORMED

OMB RULE ON UNIFORM GRANTS REGULATION Transformation of 2 CFR

CURRENT

Guidance and Agency Driven

Uniform Guidance

2 CFR has long been positioned as Uniform Guidance, providing general guidance that agencies use to establish procedures and processes for grantmaking and grant administration that are cohesive across the government while also being responsive to the needs of specific agencies.

PROPOSED

Regulation and Centralized

Uniform Grants Regulation

The proposed changes position 2 CFR as strict regulation determined by the central Office of Management and Budget (OMB). This process will centralize grantmaking policy development at the OMB instead of having agencies set the course for grant policy and administration aligned with agency needs and context. Any grant administration changes would go into effect government-wide without regard to agency-specific processes.

PRE-ISSUE REVIEW

Senior political appointees review award proposals prior to grant issuance to ensure proposals align with the president's policy priorities and national interest.

TERMINATION FOR CONVENIENCE

Agencies may terminate grants whenever they decide the grant no longer "effectuate[s] program goals, Federal agency priorities, or the national interest." Those priorities may change after issuance.

OTHER CHANGES

- May transition to full cost-reimbursement model.
- Expansion of unallowable costs.
- Restriction on DEI-related policies, principles, and practices to the maximum extent of the law.
- Prohibits utilization of grants to promote or support theories of disparate-impact liability.

LEARN MORE

[Arnold & Porter Rule Analysis](#)

[American Psychological Association Public Comments](#)

[Schwabe Analysis](#)

[American Psychiatry Association Public Comment](#)