



Alliance for Justice and 112 Organizations: Comment on Proposed OMB Uniform Guidance Revisions (OMB-2026-0034)

We, the undersigned nonprofit organizations, respectfully submit this comment in opposition to OMB 2026-0034 (Proposed Regulation to Federal Financial Assistance), specifically Section 200.450-Lobbying, which would place greater restrictions on the use of federal funds for issue advocacy, voter registration, and other policy activities. The proposed restrictions ignore the critical role that nonprofits play in informing policymakers and educating the public. The proposed regulation also risks silencing the organizations with the greatest expertise and connection to the communities that federal grant programs aim to serve.

In effect, the proposed regulation is a direct attack on nonprofits' ability to advocate for the ways public policy impacts communities' rights and lives. Civic engagement is foundational to democracy, and an integral component of nonprofit advocacy. It ensures that our communities have a voice in the government that serves them and that their needs are acknowledged and addressed by policymakers at the local, state, and federal levels. While the proposed regulations are limited to the use of federal funds, they represent yet another attempt to chill the effectiveness of nonprofits in promoting and defending our democracy.

In addition, the recommended provisions are likely to create unnecessary confusion given the already existing limitations on lobbying included in federal grant awards. By broadening the definition of lobbying in Section 200.450 to prohibit voter registration activities and "issue advocacy or public messaging that promotes or opposes a particular social, political, or public policy position unrelated to the statutory objectives or performance requirements," and certain state-level executive branch advocacy, the proposed regulations would effectively prohibit a wide range of communications that are critical to discussions related to community needs and the provision of nonprofit services.

Because of the confusion these changes would create, and the high risk of silencing issue advocacy that is integral to effective program implementation, we oppose the proposed changes. Restricting federal support for advocacy activities would reduce the flow of valuable information to government officials and undermine evidence-based policymaking. It would also unnecessarily restrict activities that are otherwise permissible for nonprofit organizations.

Thank you.



Alliance for Justice
ACLU of Hawai'i
Advancement Project Action Fund
Alliance for Youth Action
American Association of University Women (AAUW)
Americans Against Government Censorship
Asian & Pacific Islander American Health Forum
Asian and Pacific Islander American Vote (APIAVote)
Asian Law Alliance
Autistic Self Advocacy Network
California Latinas for Reproductive Justice
CalNonprofits
Caring Ambassadors Program
Catch Fire Movement
Center for Gender & Refugee Studies
Citizen Action/Illinois
Clearinghouse on Women's Issues
Coalition on Human Needs
Color Of Change
Common Cause
Community Catalyst
Community Partners
Council for Opportunity in Education
Court Accountability
Democracy Matters
Disability Rights Education and Defense Fund
Drug Policy Alliance
Elders Action Network
Elders Climate Action
Empower Missouri
Engage Miami
Equality California
Fair Elections Center
Family Values @ Work
Family Values@Work Action
Feminist Majority Foundation
Fihankra Akoma Ntoaso (FAN-DC)
Fix Democracy First
Florida Rising Together
Forests Forever
Freedom From Religion Foundation



Funders Together for Housing Justice
Greenpeace USA
Guttmacher Institute
Healthcare Anchor Network
Hispanics in Philanthropy
Houston Immigration Legal Services Collaborative
Hui Aloha 'O Hawaii Indivisible
Ibis Reproductive Health
Independent Sector
Indivisible
Indivisible Hawaii Statewide Network
Indivisible Hurley/Woodstock
Indivisible Northern Nevada
Indivisible Westside Los Angeles
Innocence Project
Leadership Conference on Civil and Human Rights
League of Women Voters of the United States
Legal Services NYC
MAZON: A Jewish Response to Hunger
mBOLDen Change
Missouri Foundation for Health
More Than Our Crimes
Movement Advancement Project
Muslim Advocates
Muslims for Just Futures
National Abortion Federation
National Association of Social Workers
National Coalition for the Homeless
National Coalition on Black Civic Participation
National Committee for Responsive Philanthropy
National Council of Jewish Women
National Health Law Program
National Homelessness Law Center
National Low Income Housing Coalition
National Network for Arab American Communities
National Organization for women
National Urban League
National WIC Association
National Women's Law Center
NBJC
Nebraska Table

New Jewish Narrative
New Left Accelerator
Nonprofit VOTE
OCCORD
PA Youth Vote
PAI
Parable of the Sower Cooperative
People For the American Way
Planned Parenthood Action Fund
PolicyLink
Project On Government Oversight
Reproductive Freedom for All
Safer Country
Secure Elections Network
Service Employees International Union
Silver State Equality
South Asian Public Health Association (SAPHA_
South Asian SOAR
Southern Poverty Law Center
State Voices
Texas Women's Foundation
The Children's Agenda
The Legal Aid Society
The Restaurant Opportunities Center of Pennsylvania (ROC PA)
The Sero Project
Unitarian Universalists for Social Justice
United Church of Christ
Vote.org
Women Employed
Women Lawyers On Guard Action Network
YWCA USA