



July 9, 2026

To: Office of Management and Budget

Re: Response to Regulation for Federal Financial Assistance (Docket OMB-2026-0034)

The National Council on Public History strongly objects to the proposed rule OMB-2026-0034 for the damaging impact it would have for our members and colleagues who work in diverse communities across the United States, from small local museums, archives, and historical societies to large cultural institutions. Federal grantmaking impacts the work and livelihoods of public historians who are at the top of their field, part-time employees advancing their organization's mission, and emerging practitioners trying to put history to work in the world.

1. Subjecting the federal grantmaking process to approval by political appointees (§200.205) threatens public history practice, which is rooted in evidence-based, inclusive interpretations of the past. Public historians rely on scholarship, professional standards, and meaningful collaboration with communities to ensure historical accuracy and prevent bias and erasure. The proposed rule would allow political appointees to override peer review, demoting these experts' evaluations of projects based on their quality, significance, and public benefit, instead requiring projects to adhere to the political goals of a given administration. This undermines the purpose of a fair and transparent grant process, which is grounded in scholarship and community co-creation, not national partisan agendas. It also risks discouraging projects that examine complex or difficult aspects of American history.
2. The proposed prohibition of DEI and "gender ideology" in grant proposals (§ 200.300) would further undermine public historians' ability to represent the full range of experiences that make up our shared history. Embracing diversity, equity, and inclusiveness strengthens our workplaces, historical interpretations, and historical scholarship. Restricting these approaches would not promote accuracy or understanding; instead, it would create uncertainty about what topics and communities can be meaningfully included in federally supported projects.
3. The proposed rule also creates serious challenges for organizations trying to plan and carry out their work (§ 200.1, § 200.102, § 200.201, § 200.208, § 200.211, § 200.340, § 200.341, § 200.342, §200.343). Allowing grants to be terminated at any time would make it impossible for recipients to responsibly budget, hire staff, establish partnerships, and complete long-term projects. This uncertainty would be especially harmful to smaller organizations, such as rural museums and local historical societies, which often operate with limited staff and rely on federal grants— often fixed grants— to support essential programs and community services.
4. Historical work requires continuity. The documentation, preservation, and interpretation of history cannot be rebuilt each time government priorities change (§ 180.25, § 200.101, §

200.202). Research must be conducted, archives must be processed, collections must be preserved, and public programs must be developed over time. A grantmaking system that changes dramatically with each administration risks undermining decades of investment in public history infrastructure.

Public historians help communities engage with the past in ways that strengthen civic understanding and democratic participation. Museums, historic sites, archives, and community history organizations provide spaces where people can encounter evidence, ask questions, and consider multiple perspectives. Destabilizing federal funding and limiting the subjects that federally-supported projects can address would weaken these opportunities for informed civic dialogue.

The NCPH urges OMB not to finalize these provisions as proposed. We welcome the opportunity to provide additional information or expertise as requested.

Respectfully submitted,

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