



June 17, 2026

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

**RE: OMB-2026-0034: Regulation for Federal Financial Assistance, 91 Fed. Reg. 32198, proposed §§ 200.219 and 200.432**

Dear Director Vought:

The Exhibitions & Conferences Alliance (ECA), a coalition of the leading professional and trade associations from across the U.S. business and professional events industry, appreciates the opportunity to submit these comments in response to the Office of Management and Budget's proposed updates to the regulations governing federal grants, cooperative agreements, and other forms of federal financial assistance<sup>1</sup>.

Every day, exhibitions, meetings, conferences, conventions, trade shows, expositions, and other business and professional events attract attendees, academics, conferees, exhibitors, and buyers from across the country and around the world to connect, share knowledge, and conduct business in communities from coast to coast. These events drive economic growth, support job creation, empower small businesses, and help solve our most urgent societal challenges. In addition, they drive demand for restaurants, hotels, travel services, and Main Street commerce nationwide. Our industry, which is comprised of more than 99% U.S. small businesses, employs 2.6 million Americans and will drive more than \$400 billion in domestic spending this year<sup>2</sup>.

On behalf of event and meeting organizers, exhibitors, suppliers, venues, and other key small business stakeholders, ECA writes to express its strong opposition to the proposed changes to §§ 200.432 and 200.219 and requests that both be withdrawn.

The proposed updates would impose new federal restrictions on awards for Federal Financial Assistance in two areas where the current rules function effectively and where the people closest to the facts and circumstances are best suited to make the decisions.

First, the proposed changes to § 200.432 would impose significant restrictions on the ability of award recipients to participate in meetings and conferences. Only permitting attendance when written into the initial terms and conditions of the award would create a new barrier to meritorious federally supported conference participation. It would reduce

---

<sup>1</sup> Office of Management and Budget, "Regulation for Federal Financial Assistance," 91 Fed. Reg. 32198, May 29, 2026.

<sup>2</sup> Events Industry Council and Oxford Economics, Global Economic Significance of Business Events, 2023.

attendance at scientific, technical, academic, workforce, and other professional meetings that help federal award recipients perform their work. It would also add delays, paperwork, and unnecessary additional bureaucracy without solving a defined problem.

Second, proposed § 200.219 would place new federal grant conditions on event services provided by public entities and, in some circumstances, non-public entities. The provision would reach into decisions involving access to facilities, security, crowd management, insurance, fees, and other services for events, meetings, and expressive activities. These are operational and safety matters with decisions that have broad potential impact. They should be made by venue operators, event organizers, public-safety professionals, risk managers, official service providers, insurers, and local officials who understand the facility, the event, the expected attendance, and the safety risks. They should not be made after the fact by grant administrators or unelected government bureaucrats applying vague national rules to local event decisions.

Our industry supports lawful expression. We also support viewpoint-neutral, content-neutral, and consistent administration of public facilities where those legal standards apply. But proposed § 200.219 is not a narrow rule about federal award costs. It is a broad attempt to federalize venue-management decisions through grant regulation. It would create confusion, increase disputes, and put public safety decisions at risk.

For these reasons, OMB should withdraw proposed §§ 200.432 and 200.219 in full.

**I. [200.432] OMB should withdraw the proposed conference-attendance restriction.**

Current 2 CFR § 200.432 already provides a clear and workable rule for conference costs. It defines a conference as an event whose primary purpose is to disseminate technical information beyond the recipient or subrecipient and that is necessary and reasonable for successful performance under the federal award. It also states that allowable conference costs may include facility rental, speakers' fees, attendance fees, meals and refreshments, local transportation, and other incidental costs unless the award terms impose additional restrictions. Conference hosts and sponsors must exercise discretion and judgment to ensure that costs are appropriate, necessary, and well managed to minimize costs to the federal award.

That framework is practical and has appropriate guardrails. It gives recipients and sub-recipients the ability to attend conferences when the conference is tied to the award, while preserving agency authority to restrict costs through the award terms when needed.

OMB's proposed change would replace that balanced approach with an unworkable prior-approval requirement. Under the proposal, costs for attending conferences would be allowable only if participation in the conference is expressly approved by the federal agency and included in the terms and conditions of the initial award.

That change would cause several problems.

**A. The proposed rule would discourage legitimate conference participation.**

Conferences are often central to the work funded by federal grants and cooperative agreements. Researchers attend scientific meetings to present findings, receive feedback, identify collaborators, and learn about related work. Health professionals attend meetings to stay current on clinical practice and research. Workforce programs attend meetings to connect training providers, employers, and public agencies. State, local, and tribal governments attend meetings to learn how other jurisdictions are using federal funds, solving implementation problems, and measuring outcomes.

Attendance at conferences is often connected to the award even when the specific conference is not known or confirmed when the award is issued. A researcher may not know whether an abstract will be accepted until months or even years after the award terms are finalized. A project team may learn about a relevant technical convening after the award begins. An award recipient may need to attend a meeting because of a new federal policy, a supply chain disruption, a public health issue, a natural disaster, a cyber-security threat, or another issue that emerges during the award period.

The proposed rule does not account for the reality of event and conference participation. If attendance must be written into the award terms in advance, many recipients will miss out on the opportunity to attend. Others will spend time seeking award modifications for routine conference participation. That will slow down award performance and reduce the exchange of information that federal programs are meant to support.

**B. The proposed rule would add paperwork without improving oversight.**

OMB states that the proposed change would clarify that recipients are not authorized to attend conferences using federal funds when the conference does not advance program outcomes. But the current rules in place already address that requirement. Conference attendance must be necessary and reasonable for successful performance under the award. Other cost principles also require costs to be allowable, allocable, reasonable, documented, and consistent with award terms.

If a conference does not advance the award, the cost is not allowable under the current framework. OMB does not need a new prior-approval rule to achieve that result.

The proposed rule would instead create a paperwork requirement that applies even when attendance is plainly connected to the award. Federal bureaucrats would have to review and approve conference attendance in advance. Recipients would have to predict conference needs early, seek modifications later, or sacrifice attendance altogether. Pass-through entities and subrecipients would face the exact same problem. This is not

efficient grant management. It is a redundant administrative burden layered on top of standards that already exist.

**C. The proposed rule would make awards less responsive to real-world needs.**

Federal awards often fund work that changes significantly over time. Research findings evolve. Workforce needs shift. Technical problems arise. New guidance is issued. Agencies convene stakeholders. Professional societies and associations respond to changing conditions by creating new programming, special sessions, workshops, and technical meetings.

The proposed rule would make it harder for award recipients to respond to the outcomes of a federally-funded grant or program. If a relevant conference was not included in the original award terms, attendance costs could be disallowed even when the conference is directly tied to the award. That is especially harmful for small organizations, early-career researchers, rural institutions, minority-serving institutions, community colleges, local governments, and smaller nonprofits that have less unrestricted funding to cover attendance costs outside the award.

The practical result is predictable: larger and better-funded organizations will still attend, while smaller organizations will be left out in the cold. That outcome does not serve federal programs or the public.

**D. The proposed rule would reduce the return on federal investments.**

Federal grants and cooperative agreements are meant to produce results. Conferences often help produce those results.

Research shows that conferences are tied to knowledge exchange, research visibility, publication outcomes, collaboration, professional learning, and changes in practice. For example, assessment following the cancellation of a major 2012 political science conference found a statistically-significant connection between a conference presentation and the likelihood that a paper would later be cited<sup>3</sup>. Additionally, studies of academic conference participation have also found direct links to publication outcomes, including the quality of the journals, article views, citations, networking, and career development<sup>4</sup>. In healthcare, a Cochrane review of educational meetings and workshops found measurable improvements in professional practice<sup>5</sup>.

---

<sup>3</sup> de Leon, Fernanda L. L. and Ben McQuillin, "The Role of Conferences on the Pathway to Academic Impact: Evidence from a Natural Experiment," *Journal of Human Resources*, 2020.

<sup>4</sup> Gorodnichenko, Yuriy, Tho Pham, and Oleksandr Talavera, "Conference Presentations and Academic Publishing," *Economic Modelling*, 2021.

<sup>5</sup> Forsetlund et al., "Continuing Education Meetings and Workshops: Effects on Professional Practice and Healthcare Outcomes," *Cochrane Database of Systematic Reviews*.

These findings match what the business and professional events industry and our small businesses see every day: Conferences are not incidental travel. When tied to the work being funded, they are a way to move knowledge from one person, institution, or community to another. They help federal investments reach the field.

OMB should not adopt a rule that treats conference attendance as suspect unless it is pre-approved and written into the award terms. The current rule already requires sound judgment, documentation, and cost control. OMB should retain that framework and withdraw the proposed § 200.432 changes.

## **II. [200.219] OMB should withdraw the proposed event services provision.**

Proposed § 200.219 would prohibit public entities that receive federal financial assistance from discriminating on the basis of viewpoint, content, or subject matter of speech, including political, ideological, or religious affiliation or perspective, in providing services for events, meetings, or other expressive activities. It would also apply to non-public entities to the extent the relevant activities are within the scope of activities funded by a federal award.

The proposal covers events sponsored, hosted, or permitted by a recipient or subrecipient on property or facilities it owns, leases, or otherwise controls. It defines “services” to include security, crowd management, access to facilities, and other logistical or safety support ordinarily provided by the recipient or subrecipient for events of a similar type and size.

The business and professional events industry agrees that lawful expression should not be suppressed because of viewpoint. We also agree that public entities should administer facility-use policies in a lawful and neutral way.

But proposed § 200.219 is the wrong tool. It would use federal grant rules to regulate local event-services decisions that depend on facts that OMB cannot know in advance. It would create legal and operational uncertainty for public venues, private venues, universities, convention centers, arenas, stadiums, theaters, hotels, conference centers, museums, libraries, fairgrounds, performing arts centers, and other facilities.

### **A. Event-service decisions are fact-specific and safety-driven.**

Event operations are not one-size-fits-all. Two events with the same attendance can require different staffing, room setups, entrances, exits, security plans, crowd-flow designs, insurance requirements, credentialing systems, loading dock plans, and emergency procedures. Those decisions may depend on many factors, including:

#### Event attributes

- expected attendance;
- whether the event occurs indoors or outdoors;
- ticketing or registration model;
- whether alcohol is served;
- whether the event uses pyrotechnics, staging, vehicles, or large equipment; and
- whether minors are present.

#### Risk management

- whether the event is open to the public;
- whether there are simultaneous events in the same venue or district;
- whether high-profile speakers or public officials are attending;
- whether protests are expected; and
- whether the venue's insurer requires additional coverage.

#### Safety and security

- whether there are prior threats;
- whether the event requires road closures or special traffic plans;
- whether local law enforcement recommends added measures; and
- whether the event organizer has the staffing, training, and operational capacity to manage the event safely.

These decisions are made by trained professionals who work in this field every day. They flexibly adjust to changing circumstances and include credentialed venue managers, event organizers and producers, security directors, official service providers, local fire marshals and police departments, emergency medical personnel, risk managers, insurance professionals, crowd managers, operations teams, and labor partners.

The proposed rule would invite federal grant compliance disputes over these decisions. It would ask OMB and federal agencies to judge whether a venue denied, reduced, modified, or priced services in a way that was inconsistent with services for an event of "similar type and size." That standard is far too vague for the event security environment. Size alone is not a proxy for risk. Type alone is not a proxy for complexity. A neutral policy can require different treatment when the risks are different.

#### **B. The proposed rule could pressure U.S. venues to underprice or underprovide safety measures.**

Proposed § 200.219 would prohibit recipients from imposing "additional, inconsistent, or unreasonable fees, security costs, insurance requirements, related charges, or other administrative burdens" based on viewpoint, content, or subject matter.

That language may sound narrow, but in practice it will create pressure on venues to avoid implementing added safety measures even when those measures are needed. A venue facing a potential grant-compliance complaint may hesitate before requiring added security, crowd management, insurance, staffing, or logistical support. That hesitation can put workers, attendees, exhibitors, speakers, and the public at risk.

The rule also does not explain how a venue should distinguish a viewpoint-based charge from a risk-based charge when the risk is tied to the expected public reaction to an event. Federal courts have long recognized that government officials must be careful when fees are tied to anticipated public response. But OMB's proposal does not solve that legal problem. It turns it into a federal grant condition and applies it across a wide range of event settings.

Venue professionals need the ability to apply neutral safety standards based on facts. They should be able to require more security for an event that has a higher risk profile. They should be able to require more insurance for an event that creates more exposure. They should be able to modify entrances, exits, staffing, timing, loading, access, or credentialing based on the event plan. They need discretion to deny an event when the facility cannot safely host it or when the organizer cannot meet neutral requirements.

OMB's proposed language would make those decisions significantly harder, and in some cases, practically impossible.

### **C. The proposed rule would create confusion for public and non-public entities.**

The proposal applies broadly to public entities that receive federal financial assistance. It also applies to non-public entities to the extent the relevant activities are within the scope of activities funded by a federal award.

That structure raises many practical questions. For example:

- Would a publicly-owned convention center that receives federal funds for an unrelated municipal program be covered for all events in the facility?
- Would a public university facility be covered for all events held on campus, including events unrelated to the federal award?
- Would a privately-operated venue be covered if it receives federal funds for workforce training, energy upgrades, emergency preparedness, cultural programs, transportation improvements, or other activities?
- Would a nonprofit museum, library, performing arts center, or fairground be covered for all events if some facility operations are tied to a federal award?
- Would a subrecipient be required to revisit all facility-use policies, rental agreements, security protocols, and fee schedules to protect against grant-compliance claims?

- How would the rule interact with state laws, local ordinances, lease terms, collective bargaining agreements, insurance requirements, fire code, life-safety rules, law enforcement recommendations, and private contracts?

The proposed rule does not answer these questions. That uncertainty matters. Venues and event organizers need clear rules before they contract for space, price services, hire staff, book speakers, register attendees, and plan security. A vague federal grant condition will increase disputes and make events significantly harder to plan and execute.

#### **D. OMB should not use grant rules to regulate venue operations.**

Federal financial assistance rules are meant to govern the use of federal funds. Proposed § 200.219 goes much further. OMB states that for public entities, the proposed requirement applies regardless of whether the event is directly funded by the award if the event occurs on property or facilities under the control of the public entity.

That is a major expansion. It means a federal award for one purpose could become the basis for federal oversight of event services across a facility or public entity. That is government overreach. It puts federal grant administrators in the middle of local venue-management decisions that should remain with event experts and local officials.

This is especially concerning because the business and professional events industry already operates under extensive rules. Venues and event organizers must comply with contracts, building codes, fire codes, occupancy limits, ADA requirements, civil rights laws, security rules, labor rules, insurance requirements, permitting rules, alcohol regulations, food-safety rules, emergency plans, and law enforcement directives. These requirements are enforced by the officials and professionals who understand the facilities and communities involved.

OMB should not add new broad and vague conditions that turn ordinary event-service disputes into federal compliance matters.

#### **E. The proposed rule could harm the very expression it seeks to protect.**

Events require planning, trust, and clear lines of authority. Organizers need to know what the venue will provide. Venues need to know what the organizer will do. Public-safety officials need to know who is responsible for each part of the plan. Attendees, exhibitors, speakers, sponsors, and workers need a safe environment.

If the proposed rule makes venues less willing to host events that carry operational risk, fewer events may take place. If venues respond by using more rigid rules, higher base

fees, or fewer discretionary services for all events, smaller groups may be priced out. If venues hesitate to make event-specific security decisions, public safety may suffer.

None of those outcomes support free expression. Safe, professionally managed venues make speech possible. OMB should not adopt a rule that makes those venues harder to operate and imperil public safety.

### **III. OMB should fully withdraw both provisions.**

ECA and the business and professional events industry understand the need for federal funds to be used properly. We support accountability, cost control, and the effective administration of federal awards. We also support safe and open events.

Proposed §§ 200.432 and 200.219 do not advance those goals.

Proposed § 200.432 would make it harder for federal recipients and subrecipients to attend conferences that help them perform award-funded work. It would add paperwork, reduce flexibility, and limit knowledge exchange. The current rule already requires conference costs to be necessary, reasonable, appropriate, and tied to the award.

Proposed § 200.219 would put federal grant administrators in the middle of event-services decisions involving facilities, security, crowd management, insurance, and logistics. These decisions require local knowledge and expert professional judgment. They should be made by venue operators, event organizers, public-safety officials, risk managers, insurers, and other experts, not by unelected government bureaucrats applying unclear national standards after the fact.

OMB should withdraw proposed §§ 200.219 and 200.432 in full.

ECA appreciates the opportunity to provide these comments. We would welcome the opportunity to provide additional information or connect OMB with event organizers, venue operators, suppliers, safety professionals, and other industry stakeholders and small businesses who can explain how these provisions would affect real events, venues, and communities across the country.

Sincerely,

A handwritten signature in black ink, appearing to read 'T. Goodwin', with a long horizontal flourish extending to the right.

Thomas F. (Tommy) Goodwin  
President & Chief Executive Officer