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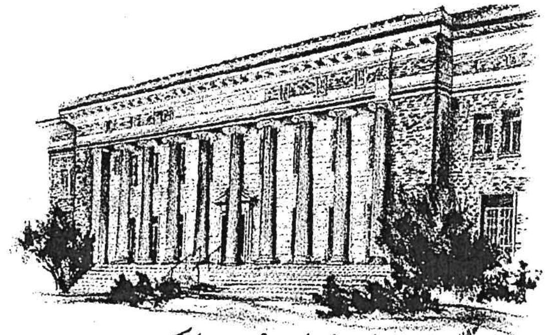

Tehama County Courthouse

Gabriel Hydrick
Chief Administrator

July 13, 2026

Office of Management and Budget
Office of Federal Financial Management
725 17th Street NW
Washington, DC 20503

Re: OMB-2026-0034, Regulation for Federal Financial Assistance — OPPOSE UNLESS AMENDED

To Whom It May Concern:

On behalf of Tehama County, thank you for the opportunity to provide comments on the Office of Management and Budget's proposed revisions to the Regulation for Federal Financial Assistance, OMB-2026-0034. Tehama County Child Support Services administers the public child support program in Tehama County in partnership with the State of California and the federal Office of Child Support Services. Tehama County Child Support Services serves citizens living in rural Northern California and manages a caseload of approximately 2,700 cases. Their work is supported in part by federal funding under Title IV-D of the Social Security Act.

Tehama County respectfully opposes the proposed rule as currently drafted unless amended. We support transparency, accountability, and responsible stewardship of federal funds. However, several proposed revisions would create unnecessary administrative barriers, reduce access to essential training and public education, and make it more difficult for Local Child Support Agencies (LCSAs) to obtain the tools, outreach resources, technical assistance, and professional support necessary to administer the Title IV-D child support program effectively.

The child support program helps ensure that parents meet their obligations to support their children, reduces family reliance on public assistance, and promotes regular support payments for families. Rules that make it harder for LCSAs to educate the public, train staff, communicate with program partners, and access program-specific technical assistance would not improve stewardship of federal funds. They would make it harder for local public agencies to deliver the outcomes the Title IV-D program is designed to achieve.

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[200.432] Conferences

Tehama County is concerned that the proposed revision to 2 CFR § 200.432 would make costs for attending conferences allowable only if participation is expressly approved by the federal agency and included in the terms and conditions of the federal award.

This proposed requirement would create a significant practical barrier for local child support agencies. LCSAs rely on conferences, statewide convenings, legal education, and professional training events to stay current on federal requirements, program operations, technology changes, legal developments, customer service strategies, performance improvement, fiscal requirements, and operational best practices. These trainings are not peripheral to federal program administration; they are a practical and necessary component of effective implementation.

For Tehama County Child Support Services, conference and training participation allows local program leaders, attorneys, caseworkers, policy staff, fiscal staff, supervisors, and other roles to receive timely education and coordinate on shared program challenges. In a state as large and complex as California, statewide and regional convenings are often among the most efficient ways to disseminate information, support consistent implementation, reduce duplication across local agencies, and avoid inconsistent local practices.

Requiring express federal agency approval for each conference and requiring that approval to be included in the terms and conditions of the federal award, would be administratively burdensome and impractical for recipients, subrecipients, pass-through entities, and federal agencies alike. Many valuable trainings arise in response to emerging program needs, new federal or state guidance, system changes, court decisions, or operational challenges. These opportunities often cannot be identified with sufficient specificity at the time a federal award is issued.

Tehama County respectfully recommends that OMB not finalize the proposed language in § 200.432. At minimum, OMB should revise the provision to allow conference attendance costs when the recipient or pass-through entity determines that attendance is reasonably related to the federal award, supports program performance, advances compliance, contributes to workforce training, provides technical assistance, supports legal education, or supports program administration. If prior approval is retained, OMB should allow approval by category of activity, such as "professional development," "program training," "legal education," or "technical assistance conferences," rather than requiring individual conference approval in the terms and conditions of the award.

[200.454] Memberships, Subscriptions, and Professional Activity Costs

Tehama County is also concerned that the proposed revision to 2 CFR § 200.454 would require prior written approval for memberships in professional, civic, business, and technical organizations and would make membership in organizations whose primary purpose is lobbying or issue advocacy unallowable.

Professional memberships and subscriptions can be core tools for local program administration. They provide access to training, operational updates, peer networks, legal and technical resources, committee participation, program materials, and opportunities to coordinate on implementation of federal and state requirements. These benefits directly support the ability of local child support agencies to administer the Title IV-D program effectively.

These concerns extend beyond any single association membership. LCSAs may pay State Bar dues, mandatory bar or licensing fees, or other professional activity costs for attorneys whose legal work is essential to establishing, enforcing, and modifying child support orders. In some counties, these costs are part of applicable memoranda of understanding or employment requirements. If § 200.454 is interpreted broadly, local agencies could face uncertainty about whether these attorney-related professional costs remain allowable, even though licensed attorneys are necessary for IV-D litigation, legal advice, court coordination, and program compliance.

Similarly, some LCSAs participate in local bar associations or chambers of commerce to educate private attorneys and employers about child support processes and employer obligations. Employer education is particularly important because income withholding orders, National Medical Support Notices, and other employer-related requirements are central to regular collections. Approximately 70 percent of child support collected comes directly from employers. Local relationships with employers and the private bar are therefore not general civic activity; they are practical tools for improving compliance, collections, and service delivery under the IV-D program.

The phrase "primary purpose is lobbying or issue advocacy" is insufficiently clear. Without further definition, recipients and pass-through entities may interpret the language broadly and conservatively, resulting in the unnecessary denial of membership costs even where the membership primarily supports training, compliance, professional development, legal services, employer education, or program administration. This risk is especially significant for public agencies that may avoid legitimate professional participation out of concern that costs could later be questioned in an audit.

Tehama County respectfully recommends that OMB not finalize the proposed changes to § 200.454 as drafted. OMB should instead preserve allowability for professional memberships, subscriptions, bar and licensing costs, local bar association participation, chamber of commerce participation, and other professional activity costs when they support program-related training, compliance, technical assistance, professional development, legal services, employer education, communications, or administration. If an organization engages in lobbying, OMB should allow recipients to allocate costs and exclude the portion attributable to lobbying, rather than categorically disallowing the entire membership cost.

[200.461] Publication and Printing Costs

Tehama County is concerned that the proposed revisions to 2 CFR § 200.461 could restrict or create uncertainty around routine child support publications and printed materials. LCSAs use brochures, handbooks, notices, informational materials, program guides, locally developed educational resources, employer materials, and customer service materials to explain services, rights and responsibilities, payment options, debt reduction programs, legal processes, employer obligations, and customer obligations.

These materials are central to effective program administration. They help parents understand how to engage with the program, how to comply with support orders, how to make payments, how to seek review or modification, and how to access services. Clear written materials also reduce confusion, improve customer service, support compliance, and can reduce staff time spent correcting misunderstandings.

A requirement that publication costs be expressly required by statute or approved in advance on a case-by-case basis would be impractical and could impede routine program communication. Local agencies often must produce or update materials in response to state guidance, court practices, technology changes, local service delivery needs, or new program initiatives. These needs may not be specifically identified in the federal award at the time it is issued.

Tehama County respectfully recommends that OMB clarify that publication and printing costs are allowable when they support program education, notices, customer service, compliance, access to services, employer education, payment reliability, parent accountability, or administration of a federal award.

[200.421] Advertising and Public Relations

Tehama County is concerned that the proposed revisions to 2 CFR § 200.421 could create uncertainty regarding child support outreach and public education. LCSAs use public outreach to inform parents and families about child support services, encourage parents to meet their support obligations, explain how to access services, and help families understand available program tools. These activities support the federal award by increasing program access, promoting parent accountability, improving collections, and helping families receive regular support.

LCSAs conduct outreach through a variety of channels, including local campaigns, community materials, public service messaging, employer education, community events, web content, and coordinated statewide or regional efforts. These efforts are not general image-building or unrelated public relations. They are program tools used to reach parents who may need services, connect families to the child support program, and encourage compliance with support obligations. Removing the ability to advertise the program services, office location, and phone number will reduce access to the program.

The proposed language could lead to overly narrow or inconsistent interpretations of whether advertising or public relations costs "benefit the federal award." This uncertainty may discourage LCSAs from engaging in appropriate outreach even when the outreach directly supports Title IV-D objectives. It may also create administrative burden for state and local agencies that must determine, document, and defend allowability for routine program education activities.

Subrecipient Monitoring, SAM.gov, and Administrative Burden

Tehama County also urges OMB to consider the cumulative administrative burden the proposed rule could place on recipients and subrecipients. California's child support program is administered locally by LCSAs in partnership with the State and federal Office of Child Support Services. LCSAs already operate in a highly regulated environment with significant oversight, reporting, audit, fiscal, and compliance requirements.

Additional approval, registration, documentation, contract reporting, and monitoring requirements could create substantial workload for state and local agencies without improving program outcomes. Requirements involving SAM.gov registration, subaward and contract reporting, and expanded monitoring may be especially burdensome for counties and local departments if applied broadly or without clear thresholds and implementation guidance.

Tehama County respectfully recommends that OMB ensure any final rule includes clear, administrable standards; avoids duplicative oversight; allows reasonable implementation timelines; and recognizes the existing monitoring structure in federally funded public programs such as Title IV-D child support.

Practical Impact on Local Child Support Program Administration

The child support program is complex, highly regulated, and dependent on consistent coordination among federal, state, and local partners. Local child support agencies operate in counties of varying size, geography, caseload composition, staffing levels, and local court environments. Training, outreach, publications, employer education, professional memberships, and peer exchange help ensure that child support professionals can implement requirements consistently and efficiently.

Restricting access to conferences, membership, subscriptions, publications, outreach, and professional activity costs would not reduce waste. Instead, it would make it more difficult for public servants to access the information, training, tools, and professional networks necessary to administer federal programs well. It could also increase administrative burden by requiring recipients, pass-through entities, and federal agencies to process and document approvals for routine, beneficial, and program-related activities.

Tehama County respectfully urges OMB to revise the proposed rule to preserve reasonable allowability for conference attendance, professional memberships, subscriptions, outreach, publications, communications, legal education, employer education, and professional activity costs when those costs support federal program performance, compliance, technical assistance, workforce development, parent accountability, customer education, payment reliability, or effective administration. OMB should maintain clear prohibitions on using federal funds for lobbying while avoiding overly broad language that would discourage legitimate professional development, public comment, operational analysis, outreach, publications, and participation in organizations that support federally funded public programs.

Conclusion

Tehama County appreciates OMB's interest in transparency, accountability, and responsible stewardship of federal funds. However, the proposed rule as drafted would create uncertainty and administrative burden for local public agencies. It would also risk limiting access to training, peer learning, outreach, publications, professional memberships, employer education, legal education, and technical assistance that help federally funded child support programs operate effectively.

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For these reasons, Tehama County Child Support Services respectfully opposes the proposed rule as currently drafted and urges OMB to revise the provisions identified above before finalizing any changes.

Thank you for your consideration.

Sincerely,

Tom Walker

Tom Walker, Chairperson
Tehama County Board of Supervisors