

Ranking Member Jeff Merkley
United States Senate
Committee on the Budget
624 Dirksen Senate Office Building
Washington, DC 20510

Chairman Rand Paul
United States Senate
Committee on Homeland Security
& Governmental Affairs
340 Dirksen Senate Office Building
Washington, DC 20510

Chairman Gary Peters
United States Senate
Committee on Homeland Security
& Governmental Affairs
340 Dirksen Senate Office Building
Washington, DC 20510

July 20, 2026

Dear Chairman Paul, Ranking Member Merkley, and Ranking Member Peters:

The [Coalition for Sensible Safeguards](#) (CSS), an alliance of over 220 labor, scientific, research, good government, faith, community, health, environmental, and public interest organizations that represent millions of Americans and advocate for effective regulations to protect the public, and the undersigned groups strongly urge you to oppose the nomination of Harold Duncan to be Deputy Director of the Office of Management and Budget (OMB).

As a coalition deeply committed to ensuring that strong regulations exist to protect the public interest and that the regulatory process is effective, responsive to the public it serves, and transparent, we are gravely concerned about Duncan's nomination to be the number two in command at OMB.

Our community values federal grant integrity, science, the environment, consumer protections, and commitment to compliance with the law, including the Impoundment Control Act. Harold Duncan's work in his current role as OMB's Associate Director of Legislative Affairs thus far suggests he does not uphold these values and is not appropriate for the deputy director position at OMB.

Duncan is currently part of the senior team at OMB executing a plan that concentrates extraordinary power in the Executive Office of the President contrary to existing law and

undermining our Constitution’s system of separation of powers and checks and balances.¹ During his tenure, we are seeing a radical and extreme ideological opposition to regulations that protect consumers, workers, the environment, and public health and safety that is hurting Americans and their families. It is essential that the deputy director of OMB understand and appreciate the role regulation plays in safeguarding the public and improving their everyday lives, and we cannot support any nominee working to carry out an agenda in direct opposition to those principles.

In addition to preparing the president’s proposed budget, OMB also encompasses the White House Office of Information and Regulatory Affairs (OIRA). Over the last four decades, OIRA has superintended the implementation of a president’s regulatory agenda by executive branch agencies. As such, Duncan, if confirmed, would have direct authority over President Trump’s regulatory decision-making, as well as its cross-cutting regulatory policies more generally.²

A concerning example of an OMB effort that emerged while Duncan has been in leadership is OMB’s May 29, 2026, proposed rule³ to significantly change the Uniform Guidance, the broad framework governing federal grants and financial assistance. These changes are extreme and radically remake the federal grant process into a politicized, ideologically driven process with vast implications for states, local governments, nonprofits, and many more entities.

This dismantling of the federal grant process politicizes federal grantmaking by empowering political appointees to approve every discretionary grant and by minimizing peer review by independent experts by deeming it advisory. Political appointees would be granted authority to cancel grants if it “no longer effectuates . . . agency priorities or the national interest;”⁴ the right to a hearing and to respond to these potential terminations would be eliminated; and compliance burdens for recipients will be vastly increased. The proposed rule could impact billions of dollars in funds that many entities currently rely upon for support. The implications of this proposed rule are devastating.

We oppose Duncan for this important position because we are concerned that he has been part of Director Russell Vought’s leadership team that not only radically proposes to politicize federal grant funding, but that has already vastly decreased funding for critical government agencies by defying congressional budget allocations; has been involved in proposing fundamentally misguided efforts that articulate a view of government employees and experts that breaks with decades of precedent regarding civil service protections; and has allowed President Donald

¹ Chapter 2 of Project 2025, https://static.project2025.org/2025_MandateForLeadership_CHAPTER-02.pdf.

² Project 2025, Chapter 2, https://static.project2025.org/2025_MandateForLeadership_CHAPTER-02.pdf.

³ Regulation for Federal Financial Assistance, 91 Fed. Reg. 32198, ((May 29, 2026), available at <https://www.govinfo.gov/content/pkg/FR-2026-05-29/pdf/2026-10817.pdf>.

⁴ Ibid.

Trump to exert vastly more control over agencies that Congress specifically created to be independent of presidential influence.⁵

While the president and OMB have a large role to play in *proposing* funding plans for agencies, Congress has the ultimate authority to appropriate funds. These appropriations are simultaneously both “ceilings” and “floors,” and a president cannot spend more or less than the amount that Congress has directed. It is clearly within Congress’s authority to adequately fund critical agencies that protect Americans and make their homes, environments, and workplaces safe, and the marketplaces in which Americans operate fair.

The American public expects that these agencies will fulfill the missions that Congress has already defined for them. If agencies are “defunded,” they simply cannot fulfill their missions and do the jobs that Americans expect from them and need to live healthy and productive lives.

The undersigned organizations strongly urge opposition to Harold Duncan’s nomination to be Deputy Director of the Office of Management and Budget.

Sincerely,

Acterra: Action for a Healthy Planet

Affordable Homeownership Foundation Inc

AFSCME

AFT: Education, Healthcare, Public Services

American Family Voices

Asian Law Alliance

Center for Biological Diversity

Center for Progressive Reform

Coalition for Sensible Safeguards

⁵ Redden, Molly and Andy Kroll, “Put them in trauma’: Inside a key MAGA leader’s plans for a new Trump agenda,” Government Executive, October 28, 2024, available at <https://www.govexec.com/management/2024/10/inside-key-maga-leaders-plans-new-trump-agenda/400607/>.

Coalition on Human Needs

Colfax South LLC

Colorado Fiscal Institute

Consumer Federation of America

Economic Action Maryland Fund

Economic Action Maryland Fund

Economic Policy Institute

Endangered Species Coalition

Essential Information

FFRF Action Fund

Food & Water Watch

Government Information Watch

Housing and Economic Rights Advocates

Indivisible

International Union, United Automobile, Aerospace & Agricultural Implement Workers of America (UAW)

Kids and Car Safety

League of Conservation Voters

Los Padres ForestWatch

National Center for Health Research

National Nurses United

Natural Resources Defense Council

Pacifica Social Justice

People Power United

Plug In America

Public Citizen

Reproductive Freedom for All

Texas Housers

The Collaborative

Third Act New Jersey

Union of Concerned Scientists

CC: Members of Senate Committee on Budget
 Members of Senate Committee on Homeland Security & Governmental Affairs