



VIA ONLINE SUBMISSION

The Hon. J. Kenneth Blackwell
Chair, Secure Elections
America First Policy Institute

July 13, 2026

RE: Proposed rule OMB-2026-0034-0001, to revise the Guidance for Federal Financial Assistance to improve government-wide policies and requirements related to the management of grants, cooperative agreements, and other forms of assistance.

Introduction

The America First Policy Institute (AFPI) supports reforms that make elections more secure, fighting for policies like [photo ID](#) requirements, [ranked-choice voting](#) prohibitions, and for [hand-marked paper ballots](#) to be used instead of QR code machines. Since its inception, AFPI has backed measures that improve security, accountability, and transparency at all levels of an election.

The proposed rule OMB 2026-0034 Section 200.450 aligns with this vision. This rule would amend grant regulations to improve security and accountability around grants issued for election-related activities, ensuring that federal funds are not used for partisan turnout. American taxpayers deserve to know that federal funds are used only for purposes that benefit all Americans, not just a political subset. Section 200.450 of the proposed rule explicitly addresses and curtails the ability for potential partisan actors to use federal funds to advance political purposes. No matter what side of the political aisle a person aligns with, this is a net positive. No American, regardless of political affiliation, should be subjected to subsidizing political activity with their taxpayer dollars.

Past Political Weaponization of Federal Funds

Several examples highlight the need for better accountability in federal fund use. These examples are not comprehensive but highlight some of the clearest and worst offenses. First, and most recently, in 2024, the House Committee on Small Business held a hearing on voter registration occurring through the Small Business Administration (SBA) under a former Biden Administration Executive Order, over which the America First Policy Institute [sued](#) the Biden Administration. In Michigan, the SBA issued a memorandum of understanding with the state to register voters. Instead of fulfilling its task of aiding, counseling, and protecting





the interests of small businesses, it involved itself in targeted voter registration on the taxpayer dime. In this critical swing state, [federal dollars were siphoned away](#) from supporting small businesses and used instead for electioneering.

Second, in 2023, the House Administration Committee called a [hearing scrutinizing California's use of federal election funds](#), including a \$35 million contract to SKDKnickerbocker, a prominent Democratic consulting and public affairs firm with strong ties to President Biden and the Democratic Party. This contract blurred the lines of nonpartisan boundaries by funding voter turnout masked as election administration. The EAC Inspector General conducted a review and found major issues with the partisan use of the grant.

Third, a notable case of federal funds being used for partisan voter engagement occurred through [The Association of Community Organizations for Reform Now](#) (ACORN). ACORN received over \$48 million in federal grants and subawards from 2005-2009. While conducting large-scale voter registration drives in typically Democrat demographics, generating over a million new registrants, ACORN faced widespread accusations of submitting fraudulent or invalid forms, including duplicates, fakes, and incomplete applications. Prosecutions and convictions soon followed in Nevada, Missouri, Wisconsin, and Washington. Congress defunded ACORN from 2009-2010 over these issues.

Finally, it is worth noting that while the infamously named "[Zuckerbucks](#)" did not originate from the federal government, their intent for nonpartisan COVID-19 relief was [distorted by nonprofits](#) into a partisan voter registration and voter turnout machine. This exemplifies how dollars intended for one purpose can be significantly weaponized for political gains by the non-governmental organizations (NGOs) tasked with utilizing them.

The Proposed Rule Offers Real Protections

All federal funds must be protected from fraud, waste, and misuse through proper accountability and transparency, and this [proposed rule](#) would accomplish that, bringing meaningful change by improving government-wide policies and requirements related to the management of grants, cooperative agreements, and other forms of assistance. It seeks to "ensur[e] that American tax dollars are not wasted or misused, activities performed under Federal awards are consistent with law and policy, and recipients are held accountable when they fail to meet relevant standards." Under this rule, NGOs can still conduct voter registration activities, but they cannot do so with federal dollars. This change, applied equally across all states, will help ensure that voter registration activities are legitimately non-partisan and preemptively cut off funding to any NGO that may have a proclivity to target certain political subsets with federal funds.





Conclusion

There are clear examples of partisan abuse of taxpayer-generated federal funds in the past. As part of this administration's whole-of-government approach to reducing waste, fraud, and abuse, the proposed rule to stop funding voter registration drives through NGOs fits perfectly into that initiative. It addresses the vulnerabilities in the current system while protecting American taxpayer dollars. Voters in our country deserve to know that election systems are not being abused. This proposed rule is a step in that direction.

The Hon. J. Kenneth Blackwell

CHAIR, SECURE ELECTIONS

The America First Policy Institute

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