



Federal Guidance Letters Summary

November 20, 2025 | Federalism Commission

Overview of SB 198, 2025 General Session

[SB 198, 2025 General Session](#), Federal Guidance Letter Amendments (Stratton) requires state agencies to report any federal guidance letters received, beginning July 1, 2025. As of this meeting, we have received 36 federal guidance letters from Health and Human Services (18), Department of Workforce Services (10), Utah System of Higher Education (5), Utah Department of Transportation (3).

SB 198 does not require the Federalism Commission to do anything with these federal guidance letters, but we have been asked by the Legislative Management Committee (LMC) to provide a report of the guidance letters received and any recommendations.

The tracking and analysis spreadsheet prepared by commission staff and stakeholders contemplates the impact of the federal guidance letters on Utah agencies and other states, as to whether or not the guidance letter infringes on an area of state jurisdiction.

Some questions to consider when reviewing these guidance letters:

- How does the guidance letter impact Utah?
- How does the guidance letter impact other states?
- Does the guidance letter cross over the line into states' jurisdiction and powers?
- Should the Federalism Commission push back against the guidance letter and, if so, how? Issue a letter in opposition or expressing concern? Request that LMC open a resolution to address the issue?

Federal Guidance Letters Received

Of the 36 federal guidance letters received, they can be broken down into the following categories:

- How federal funds are spent (16 letters)
- Informational (8 letters)
- Diversity Equity and Inclusion programs (11 letters)
- Federal shutdown (5 letters)
- Immigration status (5 letters)
- Gender or race (4 letters)

Recommendations/options

There are seven guidance letters that appear to infringe upon state powers or jurisdiction or are unclear.

There may be some letters that the commission want to invite the agencies to come and answer questions.