



July 13, 2026

Andrew Reisig
725 17th St., NW
Washington, DC 20503

Re: Regulation for Federal Financial Assistance (RIN 0348-AA32)

Dear Mr. Reisig,

On behalf of [Knowledge Alliance](#), a nonprofit, nonpartisan coalition dedicated to advancing high-quality education research and evidence-based policymaking, we appreciate the opportunity to comment on the proposed [Regulation for Federal Financial Assistance](#). Many Knowledge Alliance member organizations receive Federal grants and cooperative agreements in support of education research, evaluation, technical assistance, and evidence-building and therefore would be directly affected by the proposed changes.

Knowledge Alliance supports efforts to improve the effectiveness, transparency, and accountability of Federal grantmaking. We appreciate several aspects of the proposed rule that advance these objectives, including provisions supporting multi-year awards and increased transparency regarding employees working on Federal awards. However, we are concerned that certain provisions in the proposed rule could undermine the merit-based principles that have long guided Federal research investments and have produced significant benefits for students, educators, and communities.

Our comments are intended to help ensure the Federal grantmaking system delivers the strongest possible return on taxpayer investments by producing better evidence and better outcomes for students, educators, schools, and communities. Without these safeguards, the proposed changes risk reducing the overall effectiveness and return on investment of Federal grantmaking, ultimately limiting its ability to improve educational outcomes and inform sound policymaking.

Keep Science as the Standard

Knowledge Alliance is concerned that proposed changes to § 200.205 would diminish the role of transparent, evidence-based, and merit-driven decisionmaking in Federal funding decisions. Federal agencies appropriately establish research and funding priorities to address pressing national needs and fulfill their statutory missions. Once those priorities have been established, however, funding decisions should be guided by rigorous assessment of scientific quality, rigor, technical merit, and the potential to spur innovation and scale evidence-based solutions.

We are concerned that the proposed rule's emphasis on review by senior political appointees to assess alignment with Federal agency priorities and the national interest could reduce the influence of expert evaluations of quality, rigor, feasibility, and potential impact. While peer

review is not without limitations and improvement efforts should continue, funding decisions should be guided by transparent mechanisms that incorporate independent scientific and technical expertise when evaluating competing proposals, not rely on broader political or ideological considerations.

Federal investments in scientific research and evidence-building have played a critical role in improving outcomes for students. One of the clearest examples is the science of reading. The evidence base supporting effective reading instruction is the product of decades of Federally supported research across multiple disciplines, including cognitive science, neuroscience, developmental psychology, linguistics, and classroom-based studies of instructional interventions. This sustained investment has generated knowledge that is now helping schools across the country improve literacy outcomes for students.

These breakthroughs are possible because Federal research funding has historically been awarded based on scientific merit, technical rigor, and the potential to generate new knowledge. Weakening the role of independent peer review in funding decisions risks reducing the return on taxpayer investments by directing resources away from the strongest research proposals, ultimately limiting the development of evidence that improves student outcomes and informs effective education policy.

Support Stability to Ensure Long Term Success

Knowledge Alliance is concerned that the proposed changes to § 200.205 and § 200.340 (Termination) could create instability and uncertainty that is fundamentally at odds with the nature of scientific progress. Scientific progress depends on sustained investments that extend beyond a single Administration or funding cycle. By contrast, political priorities often shift every four to eight years. While agencies should retain the ability to terminate awards for nonperformance, noncompliance, fraud, or other legitimate reasons, recipients should be able to rely on a reasonable expectation that projects awarded through a competitive process will not be terminated solely because priorities change during the life of the award.

Introducing new political tests or ideological criteria into funding decisions on such a short cycle would be disruptive to the scientific process and would:

Discourage Long-Term Research: Researchers would be less likely to pursue important long-term questions that are critical to creating the foundational knowledge needed for scientific breakthroughs. The science of reading example mentioned above reflects the accumulation of evidence over many years and across multiple administrations, which has been pivotal to improving student outcomes in reading.

Have Significant Consequences for States, Schools, Teachers, and Students: Instability in research disrupts instructional resources, evidence-based interventions, professional learning, technical assistance, and other planned supports, leaving State and local partners without the resources needed to complete planned activities.

Harm Small Schools Systems and Businesses: Disruptions can be particularly damaging for school systems and small businesses that operate on annual budget cycles and have limited flexibility to absorb sudden funding changes. Abrupt terminations may result in immediate staff reductions, interrupted services, and the loss of institutional capacity that cannot easily be rebuilt. When projects are ended before they can be completed and rigorously evaluated, schools lose the opportunity to benefit from the knowledge those projects are designed to generate, and taxpayers lose the full return on their Federal investment.

Lead to Distrust Between States and the Federal Government and States: States, school districts, and other local partners may be less willing to participate in Federally funded research, reducing the government's capacity to produce rigorous evidence and support innovation that improves outcomes for students.

Federal funding policies should preserve the stability necessary for long-term scientific progress while maintaining appropriate accountability and maximizing the return on Federal investments.

Keep Assessment Criteria Relevant to Successful Grant Implementation

We are also concerned by the proposed expansion of factors agencies may consider when conducting applicant risk assessments under § 200.206(b)(2), including the consideration of publicly available information regarding an applicant's memberships, affiliations, or participation in certain activities or initiatives. As drafted, this provision appears to extend beyond evaluating an applicant's capacity to responsibly manage Federal funds and carry out the work of the grant. Instead, it invites consideration of activities unrelated to the performance of a specific grant award.

This approach raises significant concerns. At minimum, the provision creates uncertainty regarding how lawful speech, association, and participation in professional, academic, civic, or advocacy organizations may be evaluated during the grantmaking process. Applicants should not be placed in a position where they feel compelled to limit lawful activities, affiliations, or expression in order to remain competitive for Federal funding.

In addition, uncertainty regarding the criteria used to evaluate applicants may discourage highly qualified organizations and researchers from competing for Federal awards. A strong Federal grantmaking system depends on attracting the broadest possible pool of capable applicants and fostering robust competition among proposals. When potential applicants are unclear about the factors that may influence funding decisions, some may choose not to apply, reducing competition and limiting the government's ability to identify and fund the most qualified recipients. Ultimately, a smaller and less competitive applicant pool would likely diminish the quality of research, services, and innovations supported with Federal funds, reducing benefits for students, educators, and taxpayers.

Rather than expanding consideration to activities unrelated to grant performance, agencies should continue to emphasize objective evidence of an applicant's ability to successfully

manage Federal funds and deliver high-quality results. Such evidence may include demonstrated performance, successful stewardship of prior Federal awards when applicable, organizational capacity, and other indicators of readiness. Knowledge Alliance recommends that risk assessments should remain focused on factors directly relevant to financial integrity, compliance, performance capacity, past performance, and stewardship of taxpayer dollars.

Utilize Existing Authorities to Advance Research Priorities

Finally, we note that the Federal government already possesses numerous effective mechanisms for establishing research priorities. Agencies routinely use statutory authorities, program priorities, notices inviting applications, and competitive preference priorities to shape the focus of research investments. Federal agencies can convene advisory bodies, develop strategic plans, and work with Congress to establish new programs or modify existing ones. These tools provide substantial influence over the direction of federally supported research while preserving the integrity of the merit-review process.

The Federal grant process has been successful because it balances public priorities with independent expert judgment. The government can and should establish priorities, but it should not replace scientific merit as the primary basis for determining which proposals receive funding. Preserving rigorous peer review and maintaining long-term stability in Federal investments are essential to ensuring that Federal funds continue to serve students, leaders, and communities across the country.

Ensure Federally Funded Research Is Accessible to Taxpayers

Knowledge Alliance also encourages OMB to ensure that implementation of the Uniform Guidance does not create unnecessary barriers to the dissemination of research findings and project results. Sharing evidence is an essential component of maximizing the value of Federal investments for taxpayers. Effective dissemination allows families, teachers, school leaders, and policymakers to benefit from Federally supported research and ensures that taxpayer-funded knowledge informs improvements in policy and practice that directly lead to better outcomes for students and families.

If you have any questions, please do not hesitate to reach out to Rachel Dinkes rdinkes@knowledgeall.net. Thank you for considering these comments.

Sincerely,

A handwritten signature in dark ink that reads "Rachel Dinkes". The signature is fluid and cursive, with the first name "Rachel" and last name "Dinkes" clearly legible.

Rachel Dinkes
President and CEO
Knowledge Alliance