knowledge alliance

April 1, 2026

U.S. Department of Education
400 Maryland Avenue SW
Washington, D.C. 20202

Dear Dr. Daley,

Knowledge Alliance appreciates the opportunity to comment on the U.S. Department of Education's (ED) Notice of Proposed Priorities, Requirements, and Definitions (NPP) for the Comprehensive Centers (CC) program.

Knowledge Alliance is a nonpartisan, nonprofit, membership organization representing leading education research, evaluation, and technical assistance organizations. Our members partner with Federal, State, and local education agencies to generate and apply rigorous evidence, support implementation of Federal education programs, and strengthen the capacity of education systems to improve outcomes for students. Collectively, our members are leading experts in the effective implementation of Federal education research, technical assistance, and evidence-building programs across the country, including the Regional Educational Laboratories (RELs), Comprehensive Centers (CCs), and other Federal initiatives that support State and local improvement efforts.

The CCs play a critical role in the Federal education research and development (R&D) infrastructure by supporting State education agencies (SEAs) as they implement Federal education programs and strengthen systems that serve students and communities. Knowledge Alliance appreciates ED's commitment to improving the effectiveness of the CC program, strengthening coordination across Federal technical assistance investments, and ensuring that services respond to State needs.

We appreciate that many elements of the proposed priorities strengthen the CC program. Knowledge Alliance shares ED's goals of improving coordination across Federal technical assistance investments, elevating State priorities, and strengthening collaboration across the CC network.

However, we have concerns that some aspects of the NPP, as written, may unintentionally limit and reduce the effectiveness of the CC network. Certain provisions risk creating additional layers of Federal bureaucracy that could slow responsiveness to

State needs or disrupt the relationship-based partnerships that enable Regional Comprehensive Centers (RCCs) to provide tailored and intensive support to States. Other proposed priorities may have the unintended effect of reducing the quality of the applicant pool and delaying delivery of services to States. We further note that the new priority related to restricted indirect rates is not allowable under the law, ED's current regulations, or rules across Federal agencies.

KA supports continuous improvement of the CC program to ensure it is serving the needs of States. Our comments below outline how, as the program evolves and is strengthened, ED can ensure it remains grounded in serving the needs of States.

Knowledge Alliance encourages ED to focus on priorities that ensure that the CCs maintain and strengthen:

- High-quality, high-impact technical assistance and capacity-building services that assist States in addressing their most pressing needs;
- State-driven service delivery focused on substantive challenges;
- Direct and trusted relationships between States and RCCs;
- Responsive and context-specific support;
- Sharing of expertise across CCs on important issues;
- CC support in each State, including rural communities; and
- Efficiencies that avoid bottlenecks, duplicative efforts, or administrative barriers.

Thoughtful attention to implementation of the CC program can strengthen coordination, impact, and the responsiveness and flexibility that States can rely on.

Proposed Priority #1 National Center

KA supports a National Comprehensive Center (NCC) and believes that a unifying body assists with coordination efforts across all the Comprehensive Centers.

Based on our review of the proposed priority for the NCC, it is unclear how the new NCC model would directly interact with State Education Agencies (SEAs), Local Education Agencies (LEAs), RCCs and Content Centers. The proposal appears to establish a "concierge-style" model in which the NCC would intake, assess, and route all technical assistance requests—effectively positioning it as a gatekeeper between RCCs, States, and the broader CC network.

Rather than improving coordination, Knowledge Alliance believes that a nationally directed, top-down, "concierge style" NCC structure introduces an unnecessary, bureaucratic gatekeeper role that would result in new barriers and inefficiencies for States.

How the Proposed NCC "Concierge" Model Could Undermine Program Purpose and Services to States:

- **Delays in service delivery:** Under the current CC model, RCCs maintain direct, ongoing relationships with States. These relationships allow RCCs to respond quickly and accurately understand State needs, contexts, and plans and coordinate across the network to bring in additional expertise when necessary. This proximity and responsiveness are core to the effectiveness of the CC program. Routing requests through a national "gatekeeper" like the NCC would hinder the CC's responsiveness to State needs and slow response times—potentially adding weeks or months before support to States begins.
- **Disruption of direct partnerships:** The strength of the current system lies in direct, sustained engagement between States and RCCs that allows the technical assistance and research work to take into account the State context, plans, and past missteps and successes to build the best solution specifically for that State in the moment. This is a core element of effective technical assistance and services supporting States.
- **Centralized model introduces scale and allocation challenges:** A centralized model in which a single entity serves all States would face significant challenges in operating effectively at that scale. To function as written in the NPP, the NCC would require such substantial capacity that it could shift resources away from the RCCs providing responsive, State specific supports. In addition, if the NCC is responsible for routing work across the network, this raises questions about how it would ensure neutral and transparent allocation of requests across partners.
    - **Inequities in allocation of support:** It would be difficult for the NCC to estimate, assess, and prioritize among the requests that might emerge from the entire nation over a year in order to fairly serve all SEAs. Indeed, SEAs that already have greater capacity are likely to more quickly absorb NCC resources for expert services before lower capacity SEAs have made requests.
- **Duplicative approach to expertise**: The proposed model also raises practical concerns regarding the NCC's role in managing a centralized cadre of subject matter experts (SMEs), an approach also reflected in expectations for the REL program. It is unclear how the NCC could efficiently maintain and deploy a sufficiently broad bench of expertise to meet the full range of State needs across contexts. In practice, RCCs currently assemble fit-for-purpose teams, including small and specialized providers, based on established relationships and deep knowledge of State priorities. A centralized SME function risks adding contracting and coordination layers that could slow deployment of expertise and create duplication or misalignment across CC and REL efforts.

In practice, the RCCs already serve as “concierge style” services closest to the States, working closely with them to understand their needs and coordinate support across the network. Unlike a centralized model, RCCs should be positioned to respond in a timely and context-specific way, leveraging their own expertise and drawing on the broader CC network, including the NCC, as needed to meet State needs. As close partners with SEAs, Knowledge Alliance supports the strengthening of this bottom-up concierge-style service rather than the creation of a top-down approach that increases the burden on States to define their needs and ask for help.

Knowledge Alliance Recommendation
Knowledge Alliance supports positioning the NCC as a “backbone” coordination entity that strengthens alignment across the technical assistance network, rather than serving as a gatekeeper between States and services. In this role, the NCC could enhance transparency, alignment, and shared learning by tracking emerging needs, connecting efforts across States, and maintaining access to specialized expertise, while preserving the direct relationships between States and RCCs. This approach would reinforce coordination and continuous improvement across the system without introducing additional barriers to State access. Specifically, KA recommends that the NCC could:

- Serve as a central repository of technical assistance activities across the CC network;
- Track emerging needs and trends across States and regions;
- Support and facilitate State-to-State sharing, including through communities of practice (PLCs);
- Act as a dissemination arm for both CCs and Regional Educational Laboratories (RELs)—not exclusive, of course, but as a central platform;
- Connect efforts across States to promote alignment and reduce duplication;
- Create pools of experts in a variety of areas (from outside the CCNetwork) who are prepared to work with RCCs to fill various needs and help deploy access to these highly specialized experts across the network;
- Support RCCs in responding to emerging priorities and new Federal guidance (e.g., Dear Colleague Letters); and
- Build shared infrastructure and disseminate lessons learned across the network

Proposed Priority 2: Regional Centers
KA supports the NPP’s emphasis on effective coordination between the RCCs, the NCC, the REL in the region, and Content Centers to support States with their technical assistance requests while reducing duplication. However, as noted above, as presently

written, the notice proposes that States make their requests through the NCC and, subsequently, that the NCC coordinates with an RCC to provide State support services.

Ensure States Have Direct and Focused Access to RCCs
Under the current model, RCCs work directly with States through relationship-based partnerships that allow RCCs to develop a deep understanding of State policy context, interpret evolving needs, and respond quickly to requests for assistance. These partnerships are central to the effectiveness of the CC program.

Knowledge Alliance Recommendation
Knowledge Alliance encourages ED to ensure States retain direct access to their RCCs rather than having to route requests for services through the NCC. This would preserve the State-driven relationships that ensure that the RCCs remain responsive to States and limit additional bureaucratic layers and processes.

Proposed Priority #3: Content Centers
The NPP introduces two types of Content Centers—emerging needs centers and field-initiated centers—which are intended to ensure the program remains responsive to evolving challenges States face.

How to Ensure Content Centers Are Responsive to State Needs
For both the emerging needs and field-initiated Content Centers to be effective, both models must be grounded in the clearly expressed priorities of States—not just a single State, but shared needs across States, regions, and contexts. Content Centers are most effective when their focus areas reflect broad demand and when there are strong, ongoing feedback loops that allow States and partners to shape and refine the work over time.

Knowledge Alliance Recommendations
ED should clearly define roles across the CC network to ensure that needs identification is coordinated and streamlined, minimizing duplicative engagement with States while ensuring that Content Centers are informed by validated, cross-State demand.

To ensure Content Center applications reflect validated, cross-State needs, KA recommends that ED:

- **Emerging needs centers:** Include, in any notice inviting applications, a clear explanation of how ED gathered input from a diverse set of stakeholders across States and regions to identify and inform the chosen center topics.

- **Field-initiated centers**: Include in the application criteria that applicants must demonstrate how they engaged with stakeholders across regions, including BIE regions, communities, and student groups, in identifying the proposed need.
- **For Both Types of Content Centers:** Ensure ongoing feedback loops by building in clear mechanisms for States and partners to continuously inform, assess, and refine Content Center work.

Imposing Restricted Indirect Rates is not Allowable Under the Law or Department Regulations

A significant concern regarding the proposed priorities is the intent to apply a new restricted indirect cost rate to these awards. As explained in this section, the proposal to apply a restricted indirect cost rate cap as described and determined under 34 CFR 75.563 and 34 CFR 76.564 through 76.569[1] is both inconsistent with the Department of Education's own regulations and inadequately reasoned or explained, in violation of the Office of Management and Budget's (OMB) Uniform Grants Guidance and the requirements of reasoned rulemaking under the Administrative Procedure Act (APA).

I. The Proposal is Inconsistent with Current Department of Education Regulations

The proposed imposition of a restricted indirect cost rate on Comprehensive Center programs is inconsistent with the ED's own regulations. Multiple regulations in the Education Department General Administrative Requirements (EDGAR) prohibit EDfrom applying a restricted indirect cost rate unless it must do so to satisfy statutory requirements.

First, ED's regulations only permit the application of a restricted indirect cost rate formula where a program is subject to a statutory prohibition on using Federal funds to supplant non-Federal funds (or a "supplement, not supplant" restriction). ED's proposal would subject grantees to a negotiated indirect cost rate "as described and determined" under 34 C.F.R. § 75.563. But that section is inapplicable—it specifically applies only to grantees under "a program that is subject to a statutory prohibition on using Federal funds to supplant non-Federal funds." *Id.*

As such, this regulation by its own terms applies *only* where the underlying grant program has a statutory prohibition on using Federal funds to supplant non-Federal

[1] The notice itself cites regulation sections "34 CFR 75.563-34 CFR 75.569." *See* 91 Fed. Reg. 10356. Department of Education staff clarified in response to an email communication to Knowledge Alliance that the intended citation is 34 CFR 75.563 and 34 CFR 76.564 through 76.569, and that a correction will be made in any final notice.

funds, which the Comprehensive Centers' authorizing statute does not, *see* 20 U.S.C. § 9602. Indeed, in promulgating 34 C.F.R. § 75.563 in 1994, ED rejected comments requesting that certain categories of grantees be excluded, noting that the restricted rate is limited "only to grants made under programs that have a statutory requirement that Federal funds be used to supplement, not supplant, institutional funds." 59 Fed. Reg. 50580 (Nov. 17, 1994).

Because the Comprehensive Centers' authorizing statute contains no supplement-not-supplant prohibition, the regulatory mechanism in 34 C.F.R. § 75.563 for applying a restricted indirect cost rate is not triggered, and ED lacks authority under its existing regulations to impose a restricted rate on Comprehensive Center program grantees.[2]

Second, absent a statutory requirement to apply a different rate, ED's regulations require use of an organization's Negotiated Indirect Cost Rate Agreement (NICRA). As discussed more below, the NICRA represents a rate negotiated with the organization's "cognizant agency," which is generally the agency from which the organization receives the greatest amount of its Federal dollars. Under 34 C.F.R. § 75.560(f), "the Secretary accepts a current indirect cost rate and cost allocation plan approved by a grantee's cognizant agency but may establish a restricted indirect cost rate or cost allocation plan compliant with 34 C.F.R. § 76.564 through 76.569 to satisfy the statutory requirements of certain programs administered by the Department." Other regulations likewise contemplate the default use of the NICRA, absent an exception as specified in 34 C.F.R. § 75.560(f). *See* 34 C.F.R. §§ 75.564(b) (providing that the application of the NICRA or cost allocation plan must be in accordance with the agreement approved by the grantee's cognizant agency); 75.564(d) (indirect cost reimbursement on grants received under programs with statutory restrictions or other limitations on indirect costs must be made in accordance with the restrictions including those in 34 CFR 76.564 through 76.569). ED Guidance and trainings have also consistently made clear that the restricted rate applies *where there is a statutory requirement*.[3]

[2] Even if the ED's final notice were to remove reference to the "as described and determined under" language of 34 CFR § 75.563, under the regulatory framework, the restricted rate formula under 34 CFR § 76.564 through § 76.569 continues to apply only where the statutory prohibition on supplanting other funds exists.

[3] *See, e.g., Understanding Indirect Costs*, U.S. Dep't of Educ. (Feb. 8, 2024) at 14 (tying the restricted rate to "supplement not supplant" language), https://www.ed.gov/media/document/indirect-costs-108719.pdf; *Indirect Cost Determination Guidance*, U.S. Dep't of Educ. (Jan. 14, 2025) https://www.ed.gov/about/ed-offices/ofo/indirect-cost-determination-guidance-for-state-and-local-government-agencies#q25 ("Restricted rates incorporate the provisions of program legislation that bar supplanting.").

Accordingly, absent statutory requirements necessitating an exception—like a supplement-not-supplant prohibition—ED is required to use the grantees' NICRA. There is no such applicable exception here.

II. The Proposal is Not Justified as Required under the Uniform Grants Guidance and the Administrative Procedure Act

In addition to violating specific ED regulations governing indirect cost rates, the proposed application of the restricted rate would also violate regulatory and statutory requirements that ED justify and explain its decision. First, ED has adopted the Uniform Grants Guidance into the ED's own regulations. *See* 2 C.F.R. § 3474.1. Under the Guidance, Federal agencies generally must accept NICRAs and may use a rate different from the negotiated rate only "when required by Federal statute or regulation, or when approved by the awarding Federal agency in accordance with" the requirement that the agency implement and make publicly available the "policies, procedures, and general decision-making criteria that their programs will follow to seek," *and* "justify deviations from negotiated rates." 2 C.F.R. § 200.414(c). Because neither the underlying Comprehensive Centers program statute nor existing regulations provides for application of a restricted rate, the Uniform Grants Guidance requires that ED justify any deviation from a negotiated indirect cost rate under 2 C.F.R. §200.414(c).

Separately, the Administrative Procedure Act (APA) requires that an agency must "examine the relevant data and articulate a satisfactory explanation for its action." *Motor Vehicle Mfrs. Assn. of United States, Inc. v. State Farm Mut. Automobile Ins. Co*., 463 U.S. 29, 43 (1983). Agency decisions must therefore be reasonable and reasonably explained, and an agency that makes a change in position must recognize that it is making a change and adequately explain it, including by accounting for reliance interests. *See FCC v. Fox*, 556 U.S. 502 (2009).

ED's proposal fails to justify its application of a restricted rate in violation of the Uniform Grants Guidance and the APA. The notice barely discusses ED's reasons for imposing the restricted indirect cost rate, providing no explanation beyond a half sentence cursorily referencing maximization of direct program spending. It fails to explain its reasoning for making the change or to recognize grantees' reliance interests on the use of a negotiated rate across agencies and consistent application of both the Uniform Grants Guidance and ED regulations.

Nor could ED provide a reasonable explanation for imposing a restricted indirect cost rate here, where, as discussed, there is no "supplement not supplant" restriction in the program statute. As discussed above, the restricted rate is a method of operationalizing statutory “supplement not supplant” restrictions and was not intended to apply outside of that context. Indeed, ED guidance defines “restricted rates” as rates to incorporate the provisions of program legislation that bar supplanting.” *Indirect Cost Determination Guidance*, U.S. Dep’t of Educ. (Jan. 14, 2025).[4]

In addition, applying restricted indirect cost rates in place of NICRA rates undermines important regulatory goals of providing grantees with a transparent, uniform, and efficient method of determining reimbursement for indirect costs. The NICRA framework exists to establish a consistent and Federally approved method for allocating shared administrative costs across awards and to provide a single negotiation point—the cognizant agency—for grantees. *See, e.g.,* 2 C.F.R. § 200.414(c)(1) (requiring all Federal agencies to accept negotiated indirect cost rates); 2 C.F.R. § 200.1 (providing that a single cognizant agency negotiates rates on behalf of all Federal agencies). Here, the restricted indirect cost rate would require a separate indirect cost negotiation that can be complicated, time-consuming, and costly. Moreover, application of the restricted indirect cost rate outside of the context for which it is meant to apply will mean that nonprofit organizations will not be able to recoup substantial portions of their costs. This is likely to lead many organizations with substantial expertise to decide not to participate in this important program.

Accordingly, ED has failed to justify its deviation from negotiated rates, in violation of the Uniform Grants Guidance, and it has failed to provide any reasonable explanation for its decision, in violation of the APA.

Knowledge Alliance Recommendation
Knowledge Alliance recognizes and supports the ED’s desire to maximize direct costs supporting technical assistance and capacity building services, however, applying a restricted indirect cost rate in violation of the ED’s rules is not the way to do it. If this proposal were enacted, it could lead to lower-quality applicants and significant delays in finalizing the parameters of the work. Knowledge Alliance, therefore, recommends this proposal be removed from the final priorities so the program will attract high-quality grantees who can quickly focus on improving technical assistance and capacity building for States.

[4] *Available at* https://www.ed.gov/about/ed-offices/ofo/indirect-cost-determination-guidance-for-state-and-local-government-agencies#q25

Additional Comments:

Peer Review and Demonstrated Responsiveness
Knowledge Alliance supports that the NPP continues to rely on peer review as the primary mechanism for awarding CC grants. However, while peer review is an important tool, it is unclear whether the proposed approach will enable reviewers to distinguish between applicants that *claim* to be responsive and those that can *demonstrate* proven, client-centered success.

Expert Insight into How to Strengthen Peer Review in the NPP
In practice, most applicants can describe their work as tailored, responsive, and State-centered. However, far fewer can point to clear evidence of this in action. The effectiveness of the program depends on identifying grantees with demonstrated capacity—those with a track record of successful projects driven by client needs, and established processes for responding to feedback and resolving concerns.

Knowledge Alliance Recommendations
To strengthen the peer review process and ensure awards go to the strongest candidates that are most likely to be able to deliver high-quality services to States, Knowledge Alliance recommends that ED ensure that the review process is transparent, that there are no less than three peer reviewers per application, and that all reviewers are knowledgeable about how technical assistance is developed and delivered to States. Additionally, within the peer review, KA recommends that ED:

- **Require evidence of sustained partnerships:** Applications should demonstrate—or clearly outline how they would establish—ongoing, collaborative relationships that ensure timely and high-quality responsiveness to State needs, along with the capability to leverage expertise across the network, including the NCC, Content Centers, and RELs, to provide the strongest possible support for States.
- **Prioritize demonstrated project success:** Reviewers should assess examples of past work that show how strong partnerships led to meaningful, State-responsive outcomes.
- **Evaluate plans for client feedback and issue resolution:** Applicants should be assessed on clear, actionable processes for addressing concerns and adjusting services when needed.

Strengthening peer review criteria to emphasize demonstrated experience and accountability will help ensure consistent, high-quality service across the Comprehensive Center system.

Program Evolution and Feedback Mechanisms
Previous CC competitions placed a strong emphasis on client responsiveness and continuous feedback from SEAs. In the current NPP, these mechanisms appear less explicit. While the proposal emphasizes coordination and network structure, it is less clear how the redesigned system will ensure that States have clear pathways to communicate dissatisfaction, resolve conflicts, or request adjustments when services do not meet their needs.

Expert Insight on How to Strengthen Implementation
Given the central role States play as the primary clients of the CCs, explicit mechanisms for client feedback and accountability are important to maintaining the program's effectiveness and credibility. Knowledge Alliance knows from working directly with States the importance of deep, trusted partnerships that prioritize and build ongoing client feedback loops, mechanisms for incorporating SEA perspectives, and processes for addressing dissatisfaction or course correction when services are not meeting State needs.

Knowledge Alliance Recommendations
ED should make the mechanisms for State feedback to their CCs more explicit. Embedding feedback loops into the program design will help ensure that continuous improvement efforts strengthen the delivery of high-quality, responsive services to States. Additionally, any data that ED (or its contractors) collect about CC performance should be shared with CCs on an ongoing, as-received basis, in order to improve performance.

Need for Clarification
Knowledge Alliance wants to ensure the CC program is further strengthened through any future competition. The program requirements should be clear and ensure each element of the competition and program requirements work with each other. To achieve that, KA recommends that ED consider the following questions and suggestions to address in the final priorities for the program, considering any changes made to the priorities that may make any of these questions moot:

National Comprehensive Center
- Will the NCC provide direct technical assistance, or will its role be limited to coordination and facilitation across the network?
- Will States be required to route technical assistance requests through the NCC, or will States retain the ability to work directly with their RCCs?
- What authority will the NCC have in determining which provider responds to State requests?

- How will ED ensure that a centralized intake structure does not create delays or bottlenecks in responding to State needs?
- How will ED ensure alignment between the NCC's proposed intake and routing role and the needs assessment processes outlined for the REL program, which emphasize governing boards and SEA partnerships? The current approach appears to introduce a parallel needs identification process that could create confusion, duplication, or misalignment across CC and REL efforts.
- Can the NCC also operate a Regional or Content Center? If so, how will conflicts of interest regarding coordinating and assigning work be addressed?

Additionally, the proposed priorities raise questions about general operation and coordination of the CC network. These questions include:

- How will ED ensure that all States receive equal access to services under the redesigned structure?
- How will Content Centers coordinate with RCCs and State learning agendas?
- How does ED envision States developing learning agendas, and what role will RCCs play in that process?
- Will States be expected to have learning agendas in place prior to implementation of the redesigned network?
- How will State learning agendas be updated over time to reflect evolving State priorities?
- Does ED intend for RCCs and Content Centers to maintain a defined "bench" of subject matter experts, including both in-house and external experts? If so, what expectations should applicants meet in demonstrating this capacity?
- What are the primary responsibilities of each entity (NCC, RCCs, Content Centers, and RELs), and how will ED ensure clear delineation of roles to avoid duplication or confusion?
- Will SEAs have the ability to request that specific partner organizations be engaged to support their priorities?

Conclusion

Knowledge Alliance thanks the Secretary for advancing the process on the CC program. This is a critical Federal investment that supports the capacity of States to implement evidence-based policies and improve outcomes for students. Knowledge Alliance strongly supports ED's efforts to strengthen coordination across Federal technical assistance investments and improve the effectiveness of the program. Careful attention to program design and implementation will ensure that high-quality grantees can operate such that the CC network continues to provide responsive, high-quality support to States while advancing ED's goals for improved coordination and impact.

Knowledge Alliance appreciates the opportunity to provide these comments and looks forward to continued engagement with ED as the program evolves.

Sincerely,

Rachel Dinkes

Rachel Dinkes
President & CEO
Knowledge Alliance