

September 23, 2026
Docket ID (ED-2026-OPEPD-2542)

The Honorable Linda McMahon

Secretary of Education
U.S. Department of Education
400 Maryland Avenue, SW
Washington, DC 20202

Dear Secretary McMahon,

We write on behalf of the undersigned organizations that are a part of the [Alliance for Learning Innovation \(ALI\)](#), a coalition of more than 150 education non-profits, philanthropy, and private sector organizations that advocate for building a stronger education research and development (R&D) ecosystem.

We are writing to provide comments on the Department's proposed revisions to the Education Department General Administrative Regulations (EDGAR), focusing on provisions that would affect the administration and dissemination of federally funded education R&D. As the main means by which critical education R&D and data efforts are funded, the Department's grant administration modernization can significantly influence the quality of that R&D.

We urge the Department to ensure that the reforms strengthen, not constrain, the nation's capacity to conduct rigorous research, develop innovative solutions, and translate evidence into effective practice. As written, some of the provisions regarding continuation awards, termination authority, and indirect-cost incentives would introduce unnecessary uncertainty into federal research funding and impede the overall ability to conduct and share high-quality work. In particular, the proposed changes **threaten the competitiveness of the applicant pool, the objectivity of review, and the integrity of federally funded research**, potentially jeopardizing the return on investment from federally funded research results.

Federal investment in education R&D remains limited, at just [\\$28 per student or 1.8% of federal per-student funding](#). Given these constraints, federal investments must be efficiently designed to support high-quality research from start to finish. For example, these investments have supported the development of the Science of Reading and the understanding of how high-impact tutoring can enhance student learning. Federal investment in education R&D is essential to foster the development, testing, and scaling of evidence-based approaches that can improve outcomes for

students and educators, strengthen talent pathways, and address the nation's evolving education and workforce needs in the face of emerging technologies like AI.

For ALI's members and the broader education R&D community, predictable funding, transparent merit-based review, and the ability to disseminate findings are essential to ensuring that federal R&D investments produce meaningful and long-lasting public benefits.

Limiting Competitive Applicant Pool

- **Section 75.100** - ALI notes that the proposed elimination of requirements for the Secretary to publish certain notices in the Federal Register (FR) would detract from the valuable searchable public record of funding opportunities that the FR enables. These notices include the opportunity to apply for grants, maximum award amounts in application notices, and annual grant competition priorities. Limiting the avenues by which the Department publicizes grant opportunities (i.e., only posting to grants.gov) will inherently curb the number of potential new entrants to the application process and favor incumbents with more institutional knowledge. It also eliminates a database of archived resources for finding past and present U.S. Department of Education (USED) funding opportunities, along with relevant accompanying information that may not all be captured in the grants.gov posting.
- **Section 75.228** - ALI is also concerned about proposed Section 75.228, which would allow the Department to provide competitive preference to applicants that voluntarily accept a lower indirect cost rate than their federally negotiated rate. Indirect costs support the infrastructure necessary to conduct rigorous research, including research administration, compliance, information technology, facilities, and other institutional resources. Creating competitive incentives to forgo a portion of these costs could disadvantage organizations with different cost structures and would likely ultimately reduce the number and types of organizations able to undertake high-quality education R&D. While ALI affirms the importance of appropriate indirect cost rates and maximizing resources to direct student services and project implementation, this could dissuade new entrants who have to build additional administrative capacity to manage governmental compliance processes.
 - Additionally, a Negotiated Indirect Cost Rate Agreement (NICRA) is a formal written document between an organization and the U.S. federal government or agency that sets the official percentage rate an organization can charge for overhead and indirect costs on federal grants. Indirect rates - NICRAs - are negotiated with USED and, once agreed upon, must be used for each award moving forward. USED has the ability to make indirect rates more “competitive,”

as it negotiates and approves the NICRAs for each organization. This provision of EDGAR is unnecessary and misconstrues the process to establish indirect rates.

Preserving Objectivity in the Application Process

- ALI also encourages the Department to preserve the integrity of selection criteria and peer-review processes for federal research funding. ALI is supportive of objective and merit-based principles being employed throughout the grant application and selection process. Terms like "merit" and "high standards" as used in **Section 75.500** should be clearly defined to eliminate any misinterpretation of these expectations given the lack of a legal definition. Federal education R&D benefits from transparent, evidence-driven decision-making that prioritizes scientific quality, relevance, and real-world impact. These principles should continue to guide both the initial selection of research projects and decisions affecting their continuation. It also helps to insulate research investments from any political influence. Any changes that create uncertainty about how research awards will be evaluated or maintained over time could discourage participation in federal competitions, disrupt the long-term research and talent development pipeline, and raise questions and uncertainty about the objectivity and validity of any research. Maintaining clear, consistent standards will help ensure that federal research investments continue to support the strongest proposals and generate high-quality, evidence-based data for students, educators, parents, and policymakers.

Maintaining Research Integrity

- While appropriate oversight and accountability are essential, several provisions would reasonably inhibit high-quality applicants from competing for research grant opportunities. Federal R&D requires sufficient stability for organizations to hire personnel, execute subawards, collect data, conduct analyses, and complete research as designed. For multi-year studies, abrupt changes in funding can interrupt critical data collection and drastically diminish the value of federal investments already made. A mid-cycle termination or continuation cut can invalidate an entire study. ALI strongly recommends that these provisions be reconsidered in light of the instability they will cause for federal grantees. At a minimum, ALI strongly recommends that multi-year research projects should be exempted from these provisions.
 - **Section 75.253** - ALI is particularly concerned about several provisions in the proposed rule affecting multiyear research awards and the resulting impacts on research integrity. Section 75.253 would expand the Secretary's discretion in making continuation determinations and determining continuation award

amounts, which could create uncertainty for multiyear research projects that require stable funding and long-term planning.

- **Section 75.901** would similarly clarify the Department's authority to terminate discretionary awards for convenience, potentially allowing projects to be disrupted based on changing priorities rather than performance or compliance.
- **Sections 75.230, 75.251, and 75.252** all relate to the manner in which the Department can intervene in the timing and payment schedule and grant recipients. For multi-year research grant recipients, these conditions compound to introduce even further uncertainty for organizations on the flow of critical resources they are awarded through an already rigorous, objective process. Additionally, in 75.252 the rule proposes a new definition for "frontloading" that would enable the Department to provide the full funding amount of an award in the first year of a multi-year grant. IES practice has been to obligate annual awards for multi-year grants. We are concerned that shifting to a "frontloading" model for multi-year grants will reduce the number of IES research grants that can be funded in a fiscal year, resulting in substantially limiting opportunities to develop, pilot, and scale up evidence-based interventions to improve education outcomes.
- **Section 77.1** proposes revising several evidence definitions, including the addition of a new "evidence framework" term. The proposal to remove references to the What Works Clearinghouse (WWC) from each tier definition should be weighed carefully. Changing the definitions of WWC tiers via EDGAR could cause inconsistencies across different legal requirements for education R&D grant recipients, resulting in ambiguous expectations. ALI supports efforts to treat WWC-aligned review as just one acceptable approach among others ED may select. ED also proposes the possibility of evidence reviews shifting "at the discretion of the Department, from Department-funded evidence reviewers to reviewers funded by third parties (e.g., philanthropy, State educational agencies)." Any reviews from third parties should come with explicit limitations and guardrails to ensure the process and expertise of reviewers are free from bias, political influence, and affiliations. Because the proposed framework condenses the more detailed WWC standards into broad criteria, the same study could receive different ratings depending on who reviews it. That inconsistency would make federal grant competitions less predictable for states, localities, and other applicants and could weaken confidence that evidence standards are being applied fairly.

Accordingly, ALI urges the Department to:

- Reconsider provisions that would disincentivize new entrants into competition for R&D grants, whether because of unclear opportunities or unfeasible indirect cost rates;

- Preserve clear, performance-based standards for multiyear discretionary grants, removing any subjectivity in decision-making, and avoid allowing changes in agency priorities to unnecessarily disrupt active research projects;
- Maintain transparent, objective processes for evaluating federally funded education R&D; and
- Engage with researchers, institutions of higher education, states, practitioners, and other stakeholders as the Department develops the final regulations.

Should the Department move forward with the proposed changes, ALI highly recommends exempting multi-year research projects and grants administered by Institute for Education Sciences from these provisions given its semi-independent status and the uniquely negative impacts these changes will have on education R&D grant recipients.

Education R&D is essential to building an educational ecosystem that can improve outcomes for all students and educators. Our organizations stand ready to work with the Department to advance a federal R&D system that can deliver meaningful results for learners, educators, families, and communities.

Thank you for your consideration of these comments.

Sincerely,

Advanced Education Research and Development Fund (AERDF)

AI and Education Studio

All4Ed

Alliance for Learning Innovation

American Association of Physics Teachers

American Chemical Society

Applied Learning Insights LLC

Center for Civic Education

Committee for Children

Consortium for School Networking - CoSN

Data Quality Campaign

Digital Promise Global

Earth Force

EDGE Partners

Education Knowledge Broker Network

Education Reform Now Advocacy

Former Utah State Superintendent of Public Instruction

FullScale
Good Reason Consulting, LLC
Imagine Network
InnovateEDU
Institute for Advancing Computing Education
Knowledge Alliance
The Learning Agency
Leadership Lady
LearningForge LLC
National Council of Teachers of Mathematics (NCTM)
National School Boards Association
SERP Institute
StriveTogether
The Center for Outcomes Based Contracting
The Concord Consortium
The Tech Interactive
Transcend