



September 23, 2026

U.S. Department of Education
Office of Planning, Evaluation and Policy Development
400 Maryland Ave SW
Washington, DC 20202

Dear Zachary Rogers,

Knowledge Alliance appreciates the opportunity to comment on the U.S. Department of Education's (the Department) [proposed amendments](#) to the Education Department General Administrative Regulations (EDGAR).

[Knowledge Alliance](#) is a nonpartisan, nonprofit membership organization representing leading education research, evaluation, and technical assistance organizations. Our members partner with 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.

Knowledge Alliance supports the Department's efforts to improve the clarity, consistency, and efficiency of Federal grant administration. We particularly support efforts to reduce unnecessary administrative burdens and streamline grantmaking processes. At the same time, several provisions of the proposed rule could have unintended consequences for the organizations that conduct Federally funded education research, evaluation, and technical assistance and, ultimately, for the quality and stability of the Federal education research and evidence infrastructure.

Knowledge Alliance offers the following recommendations to help ensure that efforts to improve efficiency do not inadvertently undermine these important Federal investments that support improved student outcomes.

**Competitive Preference for Lower Indirect Cost Rates Could Undermine Quality and Efficiency
Competition (§ 75.228)**

Knowledge Alliance strongly recommends that the Department not finalize proposed regulation §75.228. While Knowledge Alliance strongly supports efforts to ensure that Federal resources are used efficiently, effectively, and maximize benefits for students and communities, we are concerned that the proposed provision fundamentally misunderstands the purpose of Federally negotiated indirect cost rates.

A negotiated indirect cost rate is not simply an administrative surcharge or optional overhead charge. It represents a Federally approved method for allocating the legitimate shared costs of carrying out Federal work. The proposed regulation would permit the Secretary to provide competitive preference to applicants that voluntarily agree to use an indirect cost rate below the Federally negotiated rate to which they otherwise would be entitled. Applicants could elect reductions of 5, 10, 20, 30, 40, or 50 percent, or elect not to charge indirect costs at all. Applicants making such an election would be required to maintain the reduced rate for the life of the grant.

Providing competitive preference to organizations that are willing or able to absorb these costs does not necessarily identify applicants that can deliver Federal programs more efficiently. Instead, it may advantage organizations with access to unrestricted institutional resources, endowments, or other sources of subsidy over organizations whose financial structures require appropriate recovery of the actual costs associated with Federal work.

Although the proposed rule characterizes the reduction as voluntary, the practical effect in a competitive grant environment may be very different. If applicants know that relinquishing a portion of their negotiated indirect cost rate could improve their likelihood of receiving an award, they will face strong pressure to under-recover legitimate costs simply to remain competitive. Inadequate recovery of indirect costs can make participation in Federal programs financially unsustainable and may ultimately discourage highly qualified organizations from competing for important Federal education work. It can also create incentives for applicants to under-resource the organizational infrastructure necessary to carry out Federal programs effectively and efficiently, potentially undermining the quality, reliability, and long-term sustainability of grant-funded activities.

This approach could also reduce competition for highly specialized Federal education grants.

The Department's own experience demonstrates that indirect cost caps can reduce competition without achieving their intended savings.

In its March 4, 2024 [Federal Register notice](#) of proposed priorities for the National Technical Assistance Center to Improve State Capacity to Collect, Report, Analyze, and Use Accurate IDEA Part B Data, the Department specifically addressed its prior experience with an indirect cost cap. Based on that experience, the Department proposed removing the reduced indirect cost rate cap, explaining that:

- “we found that it led to a decrease in the number of applicants, which limited competition”; and
- “we found that the indirect cost cap did not result in a decrease in the amount of indirect costs charged” and did not “maximize the amount of grant funds used to provide TA to states.”

The Department's own experience therefore provides important evidence that policies designed to limit indirect cost recovery may not achieve the intended objective and may instead reduce competition. Organizations unable to fully recover reasonable and allowable costs may choose not to compete, potentially reducing the Department's access to experienced technical assistance, technology, research, and data-system providers.

Additionally, The Department's own regulatory impact analysis underscores that this is not a marginal policy change. The Department assumes an average indirect cost rate of 25 percent and models reductions to 20, 15, and 8 percent. Under one modeled scenario, the Department estimates that the proposed changes in this regulation could shift approximately \$45 million annually from indirect costs to direct costs.

Those costs, however, do not disappear when they are no longer reimbursed through the Federal award. Organizations must still maintain the financial systems, cybersecurity infrastructure, human resources capacity, compliance functions, and other organizational systems required to perform Federal work. Reducing reimbursement for these legitimate costs does not make Federal programs less expensive or more efficient; it simply shifts the financial burden elsewhere. Over time, this approach

could undermine the organizational capacity necessary to ensure that Federal grants are administered efficiently, responsibly, and with high quality.

This is especially concerning for nonprofit research, evaluation, and technical assistance organizations, small businesses, and veteran owned businesses that may not have substantial unrestricted resources available to subsidize Federal awards. The proposed rule could therefore have the unintended effect of discouraging participation by highly qualified organizations and create incentives to prioritize lower proposed costs over an applicant's demonstrated capacity to deliver high-quality, effective, and efficient services. Over time, this could weaken the quality of Federal grant-funded work rather than improve its value or efficiency.

Knowledge Alliance Recommendation: The Department should withdraw proposed § 75.228 and continue to honor Federally negotiated indirect cost rates without making an applicant's willingness or financial ability to forgo legitimate cost recovery a factor in competitive grant selection.

Preserve Rigorous and Consistent Federal Evidence Standards (Part 77)

Maintain Common, Consistent and Understandable Evidence Standards

Knowledge Alliance supports the Department's goal of maintaining clear and rigorous definitions of evidence consistent with Federal law. We also recognize the potential value of providing flexibility in how applicants demonstrate that research meets Federal evidence standards. However, the proposed regulations would create changes to the evidence standards that are inconsistent with the current Federal standards of evidence and will halt progress towards common language and understanding of evidence standards. One of the strengths of the current Federal education evidence infrastructure has been the development of transparent, recognizable, and understandable standards that allow researchers, teachers, policymakers, and the public to understand why a study does or does not meet a particular level of evidence.

The Department proposes to remove references to the What Works Clearinghouse (WWC) from the definitions of "experimental study," "quasi-experimental design study," "moderate evidence," "promising evidence," and "strong evidence," while adding a new definition of "evidence framework" that allows additional approaches for verifying rigor and retains WWC-aligned review as one permissible method. We strongly recommend that the Department retain the references to the WWC standards as the common methodological benchmark for defining these levels of evidence.

Discretionary grants that use these definitions in their Notice Inviting Applications do so to ensure that taxpayer dollars are invested in implementing and evaluating evidence-based interventions. The WWC evidence standards serve an essential purpose: helping the Department direct Federal resources toward evidence-based programs that are likely to improve outcomes for students, educators, and communities. The WWC standards are detailed and publicly available and provide clear guidance on how to determine if a study's research design was well implemented. This ensures that studies meeting WWC standards support appropriate conclusions about whether an intervention, program, or practice caused positive impacts for students. Other standards, frameworks, or approaches may not have a systematic approach for determining whether a study's research design was well implemented and supports causal findings, or that approach may not be well documented or publicly available. This would make it difficult to know if grant funding will yield a good return on substantial public investment.

Further, while the Department estimates that applicants and the Department will realize cost savings as a result of this change because it shifts the burden of verifying study findings away from the Department and toward other entities, any savings realized in reviewing applications for funding could be lost and result in wasted investment of grant funds in interventions that are not supported by evidence of their effectiveness.

Another consequence of broadening the definitions of strong, moderate, and promising evidence without ensuring comparable methodological rigor could be that the evaluations of the funded interventions are less rigorous. Discretionary grant programs like the Education Innovation and Research program currently fund evaluations of interventions that support conclusions about whether they worked for those that were served. If the definitions are broadened in ways that allow less rigorous evidence to qualify, taxpayer dollars aimed at identifying what works could be wasted.

Ensure Transparency

Transparency is equally important. Organizations making evidence determinations should be required to use publicly available review standards and provide sufficient information for applicants, researchers, policymakers, and the public to understand what standards were applied and how a determination was reached.

Knowledge Alliance Recommendation: Instead, we recommend preserving the WWC standards as the common, transparent, and sufficiently detailed set of methodological standards while allowing a broader range of qualified reviewers to apply them. An expanded reviewer pool supported by safeguards for consistent application of standards could produce reviews that document how the standards were applied and can be made publicly available and reusable for different competitions or other evidence-building purposes. This approach will reduce bottlenecks and costs to the Department while preserving the central purpose of the evidence requirements: identifying and supporting programs with credible evidence that they will work.

Ensure Stability and Predictability for Multiyear Federal Investments (§§ 75.230, 75.251, 75.252, 75.253, and 75.901)

Knowledge Alliance recognizes that the Department needs appropriate tools to manage Federal awards, ensure performance, and protect taxpayer resources. At the same time, we urge the Department to consider the combined effect of the proposed changes governing multiyear awards, continuation funding, frontloading, de-obligation, and termination.

These changes are particularly consequential for Federal education research and evidence-building, where producing high-quality, reliable evidence often depends on sustained investment, consistent implementation, and the ability to carry work through its planned period of performance. Uncertainty about whether funding will remain available can disrupt research designs, interrupt data collection, undermine implementation, and ultimately compromise the quality and usefulness of the evidence the Federal government is investing, resulting in a grantmaking system that repeatedly interrupts research and evidence-building efforts and risks leaving behind a collection of partially completed studies, incomplete data sets, and unfinished evaluations that cannot answer the critical questions the Federal government is seeking answers to. This is not an efficient use of Federal resources; when important work is interrupted before it produces meaningful findings, the government may ultimately have to

invest additional resources to restart or replicate the work, rather than building on the investments it has already made.

Federal education research, evaluation, and technical assistance projects frequently require multiyear investments. Grantees hire specialized personnel, establish partnerships with States and school districts, enter contractual commitments, collect longitudinal data, and design research and technical assistance activities around the project periods established by the Department. Predictability is therefore not simply a benefit to grantees—it is often essential to successful implementation of the Federal investment itself.

Proposed regulation § 75.230 states that neither approval of an application nor an initial award obligates the Federal government to make additional, supplemental, or continuation awards. Proposed changes to § 75.251 would clarify the Secretary’s authority to adjust awards when unspent balances exceed a grantee’s needs. Proposed § 75.252 would expressly authorize partial or full frontloading of future budget periods. The Department also proposes changes to continuation funding that would permit partial awards, installment funding, delayed release of funds, and continuation decisions at any point during the applicable fiscal or appropriation year.

Knowledge Alliance recognizes that frontloading may, in some circumstances, enhance funding certainty and administrative efficiency. We also recognize the Department’s need to address unspent balances and ensure that Federal funds are used effectively. However, the combined structure of these provisions should not create uncertainty around whether grantees will receive the funding necessary to complete approved multi-year projects.

Knowledge Alliance is also particularly concerned about the proposed changes to § 75.901, which would expressly authorize termination of a grant “for convenience of the Secretary or pass-through entity.” Federal grantmaking depends on the reasonable expectation that grantees selected through a competitive process—that comply with the terms of their awards and make substantial progress toward approved objectives—will generally be able to carry out the projects for which they were selected.

The potential consequences of instability created by this proposed change extend well beyond the grantee; they can be felt directly by States, school districts, educators, students, and communities. For example, a State or school district may commit staff and resources to a multiyear technical assistance partnership; a State or school district may commit to or rely on data from longitudinal data collection that only produces meaningful findings after several years; schools and communities may invest time in implementing and evaluating an intervention; students may be receiving special services or interventions; or specialized staff may be hired specifically to carry out the work. The result is not simply uncertainty for the grantee; it is wasted time and resources and abandoned work. For example, halting work midway could result in the sudden removal of an assistive technology that students have been using all year. This creates lost opportunities to generate evidence and improve outcomes for students and communities and, in many cases, the interruption of a Federal investment before the work can be completed can diminish or eliminate the value of the resources already invested.

Similarly, termination for convenience should not become a mechanism for discontinuing compliant grants merely because agency priorities change after awards have been competitively made. A system in which grantees cannot reasonably rely on the continuation of high-performing multi-year awards may

also make it more difficult for the Department to attract highly qualified organizations and personnel to Federal work.

Knowledge Alliance Recommendation: The Department should withdraw proposed regulations §§ 75.230, 75.251, 75.252, 75.253, and 75.901 and instead maintain the current regulations for governing continuation reductions, delayed funding, and termination of grants. The Department should continue a system where grant termination is done due to clearly communicated cause and not based on shifting Department priorities.

Streamline Publication Requirements While Preserving Public Input and an Authoritative Public Record (§§ 75.100, 75.104, 75.105)

Knowledge Alliance supports the Department's efforts to reduce unnecessary administrative requirements and streamline duplicative publication processes. We agree that prospective applicants should not have to monitor multiple sources to identify Federal funding opportunities.

Proposed changes to § 75.100 would limit the avenues through which the Department publicizes grant opportunities, which could inadvertently reduce competition for Federal grants. A narrower approach to publicizing opportunities may result in fewer organizations becoming aware of and pursuing grant competitions, while organizations with greater familiarity with the Department's grantmaking processes and established Federal relationships may be more likely to participate. Over time, this could reduce the pool of qualified applicants and limit the Department's ability to identify the strongest organizations and proposals through robust competition.

Additionally, the Federal Register publication serves a function beyond notifying prospective applicants about grant competitions. Under § 75.105, the Department generally provides an opportunity for public comment before establishing annual absolute and competitive preference priorities, subject to specified exceptions. These priorities can shape the direction of Department grantmaking across programs and therefore are relevant to a much broader community than prospective applicants.

Knowledge Alliance supports retaining the opportunity for public comment provided under § 75.105. As the Department eliminates the requirement to publish annual priorities in the Federal Register, however, it should ensure that researchers, State and local education agencies, practitioners, membership organizations, and other interested stakeholders have a clear and reliable way to learn when proposed priorities are available for public comment. Grants.gov may be an effective mechanism for notifying prospective applicants about funding opportunities, but stakeholders interested in Federal education policy may not routinely monitor Grants.gov. Moving notices away from the Federal Register without establishing an equally accessible and predictable mechanism for public notice could therefore unintentionally reduce participation in a public comment process that the proposed regulations otherwise preserve.

The Federal Register also provides an authoritative and durable public record of proposed and final Department priorities. Any alternative publication mechanism should preserve that function.

Knowledge Alliance Recommendation: Knowledge Alliance supports streamlining duplicative publication requirements but recommends that the Department establish a clear, predictable, and publicly accessible mechanism for announcing proposed priorities and opportunities for public comment. Proposed and final priorities, comments or related notices, grant notices, and amendments

should also remain searchable, permanently archived, and clearly identifiable as the authoritative record of Department action.

Conclusion

Knowledge Alliance supports the Department's efforts to improve the effectiveness and efficiency of Federal grant administration and reduce unnecessary administrative burden. Thoughtful modernization of EDGAR can make Federal grantmaking more efficient while maintaining the standards and infrastructure necessary for Federal education investments to succeed.

As the Department finalizes these regulations, Knowledge Alliance encourages the Department to ensure that efficiency and flexibility do not inadvertently undermine fair competition, rigorous and consistent evidence standards, the stability of multiyear Federal investments, the ability to identify organizations with demonstrated capacity to successfully perform Federal work, or the maintenance of an authoritative public record of Federal grantmaking.

Knowledge Alliance appreciates the opportunity to provide these comments and looks forward to continued engagement with the Department as they strengthen the Federal education research, evaluation, evidence-building, and technical assistance infrastructure.

Sincerely,

A handwritten signature in cursive script that reads "Rachel Dinkes".

Rachel Dinkes
President and CEO
Knowledge Alliance