



September 23, 2026

Zachary Rogers
Senior Advisor
Office of Planning, Evaluation and Policy Development
U.S. Department of Education
400 Maryland Avenue SW
Washington, DC 20202

Re: Docket ID ED-2026-OPEPD-2542, Education Department General Administrative Regulations

Dear Mr. Rogers:

Thank you for the opportunity to comment on the Notice of Proposed Rulemaking (NPRM) with revisions to the Education Department General Administrative Regulations (EDGAR). We write on behalf of 34 organizations representing the Friends of the Institute of Education Sciences (IES), a coalition committed to supporting the mission of IES and ensuring that IES has adequate resources to meet that mission. The federal investment in IES has been essential to funding research that has led to the development of evidence-based reading practices, producing federal statistics that highlight the condition of education, and generating evidence-based tools and guides in partnership with states and districts.

Although this coalition typically focuses on IES appropriations, we are advancing these comments as the proposed updates to EDGAR would have significant ramifications for IES research grantmaking and technical assistance programs should they be finalized and implemented. We also recognize that the Department of Education is advancing the revisions to EDGAR in parallel to similar proposed updates to the Office of Management and Budget (OMB) Uniform Guidance on Federal Financial Assistance. As you know, the FY 2027 Continuing Resolution (CR) prohibited the implementation of the OMB Uniform Guidance rule through December 11, 2026. **With the CR provision in mind, we urge the Department to withdraw the proposed changes to EDGAR.**

Should the rulemaking process for EDGAR move forward, we recommend that the Department address the following issues:

- 1. Maintain current requirements to publish an application notice, maximum award amounts for grant competitions, and priorities for the selection of applications in a particular fiscal year in the Federal Register. (§ 75.100, 75.104, 75.105)**

As proposed, removing the requirement to publicize grant opportunities and related priorities in the Federal Register would reduce transparency. Even if IES grant opportunities are published on Grants.gov or through other communication methods (e.g., IES director blog), Federal Register notices provide awareness beyond prospective grant applicants of opportunities and priorities. This is especially important for the broader IES stakeholder community to track and share research grant opportunities with their constituents.

2. Remove preference for grant applicants proposing lower indirect cost rates. (§ 75.228)

We are concerned that placing a preference on awards to grant applicants at institutions with a lower indirect cost rate would conflict with IES's scientific peer review process. Allowing indirect cost rates to influence grant recipients fundamentally changes the review process from a merit-based system to one based on the lowest bidder. Since indirect cost rates are connected to aspects unrelated to research quality, it has no place in determining which grant applications get funded.

Given the prohibition on changes to the uniform guidance, we urge the department to decouple grant decisions from indirect cost rates. Decisions on awarding grants through the National Center for Education Research (NCER) and National Center for Special Education Research (NCSE) should adhere to "scientifically based research standards," as required under the Education Sciences Reform Act (ESRA), and the IES Standards for Excellence in Education Research that undergird guidelines in Requests for Application and peer review of applications.

3. Maintain practice of obligating funding for multi-year IES grants on an annual basis. (§ 75.252 and related definition of "Frontloading" in § 77.1)

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.

We have already seen evidence of how this practice has been implemented at the [National Institutes of Health](#) and the [National Science Foundation](#) and the resulting reduction of the number of research grants awarded in FY 2026. The 2025 PISA results are the most recent imperative to invest in evidence-based solutions to improve math, reading, and science achievement for global competitiveness. We thus urge the Department to continue current practice at IES to obligate multi-year research grants on an annual basis.

4. Remove language that would enable the Department of Education to terminate or suspend grants “for convenience.” (§ 75.901)

The addition of language to terminate or suspend grants “for convenience” would go beyond similar “discretionary termination” language that has been proposed for the OMB Guidance on Federal Financial Assistance and the National Science Foundation (NSF) Guidance on Financial Assistance for grants that are deemed not to effectuate agency priorities, program goals, or the national interest. We urge the Department to remove this proposed language as applied to IES research grants, as it would pose significant challenges for long-range planning and data collection and analysis. In addition, terminating IES grants “for convenience” would result in reduced access to education interventions, disruption of partnerships between researchers and schools and communities that implement and scale up evidence-based solutions, and the loss of financial support for graduate students funded through IES grants awarded to principal investigators.

5. Consider updates to evidence definitions that would encompass the broad range of research methods for IES grants that adhere to ESRA’s definition of “scientifically based research standards.” (§ 77.1)

The updates to various evidence definitions have the potential to limit the types of research methods that are eligible for use on IES research grants. As one example, the proposed update to “experimental study” would remove regression discontinuity analysis as a research method that meets this definition. We recommend that the Department of Education continue to enable IES to support grantee use of the full range of research methodologies that are appropriate to address research questions in projects funded through NCER and NCSE and described in the definition of “scientifically based research standards” in ESRA. We also recommend that the Department retain the references to the What Works Clearinghouse standards as the common methodological benchmark for defining levels of evidence.

We thank you for your consideration of these comments.

Sincerely,

Alliance for Learning Innovation
American Association of Physics Teachers
American Educational Research Association
American Mathematical Society
American Political Science Association
American Psychological Association Services and American Psychological Association
American Statistical Association

Association of American Universities
Association of Population Centers
Biophysical Society
Consortium of Social Science Associations
Council for Exceptional Children
Council of Administrators of Special Education
Council of Parent Attorneys and Advocates (COPAA)
Council on Undergraduate Research
Division for Research, Council for Exceptional Children
EDGE Partners
Higher Education Consortium for Special Education (HECSE)
Knowledge Alliance
LEARN Coalition
National Academy of Education
National Center for Learning Disabilities
National Council of Teachers of Mathematics (NCTM)
National Council on Measurement in Education
National Rural Education Association
National Science Teaching Association
Population Association of America
Results for America
Society for Research in Child Development (SRCD)
Society for Research on Educational Effectiveness
Teacher Education Division of the Council for Exceptional Children
The Center for Learner Equity
University of Oregon College of Education
University of Washington College of Education