

July 13, 2026

Office of Management and Budget
Executive Office of the President
725 17th Street, NW
Washington, DC 20503

Re: Comments on Proposed Regulation for Federal Financial Assistance,

(Docket No. OMB-2026-0034)

We respectfully submit these comments in response to the Office of Management and Budget's proposed rule on "Regulation for Federal Financial Assistance," published in the Federal Register on May 29, 2026. We are board members of the Society for Research on Educational Effectiveness ([SREE](#)), a 20-year-old membership organization representing research professionals at the forefront of causal inference research in education. Our individual members are college and university faculty, researchers at scientific organizations and think tanks, practitioners delivering educational services, and students studying statistical approaches and methodological tools to improve research and evaluation designs.

Our board and our members have evaluated some of the most groundbreaking and high-impact interventions in early childhood, K-12, and post-secondary education, in partnership with early childhood centers, school districts and colleges and workplaces around the country. Many of these interventions delivered essential education services: instructional support for students with special learning needs, coaching for teachers working with students reading below grade level, and financial aid counseling to first-generation college students, to name just a few. Our comments reflect what we have learned through close partnership and evaluation of what helps parents, students, and the many teachers and staff employed by care centers, schools, and colleges.

We urge the complete withdrawal of this proposed rule. The proposed OMB rule contains provisions that would undermine taxpayer investments, remove the foundational principle of research independence, and create unnecessary volatility in schools, which often provide a place of stability for communities and families. This rule also would limit the Secretary of Education's ability to support children, families and their communities with effective investments and services. If OMB chooses to move forward with this rule, we would like to discuss areas that raise particular concerns:

Prohibition on "Disparate Impact" Research Conflicts with Decades of Evidence

First, we note this section of the rule is unclear as to whether it prohibits analysis that might demonstrate disparate impact or if it prohibits programs that assert disparate impact exists and then offers services accordingly.

Second, if analysis is indeed prohibited under §200.218, we have serious concerns. The field of evaluation and effectiveness research asks what works, for whom and under what conditions. A repeated finding across decades of U.S. education studies is that the effect of interventions and programs varies – across geographies, instructional settings, students' prior experience and quality of instruction, as well as by

student and teacher demographics. This prohibition (§200.218) essentially asks researchers to ignore thousands of study findings and evidence, as well as asking state and local education agencies to ignore statute itself: The Education Sciences Reform Act (ESRA) calls for reporting on the student achievement gap and ways to close it; the CHIPS and Science Act requires reporting on barriers to Science, Technology and Math (STEM) participation and achievement – acknowledging a long history of different outcomes for different students; and finally, Title I of the Elementary and Secondary Education Act (ESEA) requires collecting and reporting data disaggregated by race, ethnicity, income, disability status, and English learner status, so that education agencies support students who are consistently underperforming.

In addition, this prohibition, if allowed to stand, would steer parents away from exactly the kinds of questions they ask and want answered about whether an intervention, program, or policy works for students like theirs, not just whether it works for the average student. School choice itself rests on reliable and ongoing data collection and reporting about how students perform at a school and which students are best served by that school and district. This is also what prospective college students want to know – “how has this institution and campus served students like me?” In addition to consulting evaluation studies for this information, the Department of Education’s own College Scorecard offers this information in concert with data on majors, average time to degree and other factors that allow a student to decide whether this is the right investment of time and resources. Taking these data away simply undermines choice.

Termination and suspension of grants would disrupt programs, not just research, and Waste taxpayer resources invested in critical services

The proposed rule (Section 200.340) would authorize agencies to terminate discretionary grants based on interpretations of alignment with “national interest.” Grants that are compliant could be canceled, with no meaningful notice to grant recipients and no offer of appeal.

Canceling grants that were meant to collect data or evaluate whom a program helped does not just harm research. It harms the students, teachers, schools, and others who receive the services being studied– grants often fund both the implementation of and research about tools and programs like tutoring or financial aid or uses of AI. In these cases, canceling a grant ends the implementation of key supports or tools being used. A school district might agree to be part of a research project that is testing a particular type of math tutoring so that students performing below benchmarks get the support they need. Cancelling the grant would cancel both the delivery of tutoring –whether delivered by a volunteer, an employee, or an AI agent— and the research to assess how well it works for those students.

In addition, cancelling grants midstream wastes resources already invested and leaves the field and partners without answers to their pressing questions. In education, as is the case in many fields, research works best in partnerships with research participants, including districts, schools, and teachers. These upfront investments in engaging research participants ensure that the survey questions and other data collected are relevant to current circumstances, and that a representative group of people respond substantively to the questions asked in surveys or that are included in the administrative data.

Grants canceled in the last year already have forced innovation projects and ongoing studies to stop data collection that taxpayers supported. Funds that supported dedicated staff at districts and states to share data have already declined. Uncertainty in future funding means that research units within districts, states, research firms or universities that are able to synthesize knowledge quickly and reliably for policymakers have reduced the amount of critical data analysis they are sharing precisely when lawmakers need it most. Building reliable and valid knowledge about effectiveness requires new students and workers to enter the research field, get field experience conducting data collection with schools as well as conducting analysis with expert methodologists. Fewer people in the field does not improve the quality of analysis or allow for more responsive research or policymaking.

In addition to staff limitations, research timelines also are constrained by how quickly outcomes can change even when an intervention is effective. Brain development and cognitive science show that students do not learn new skills immediately. New cognition and behavior change takes repeated exposure and practice that comes with time and with the reality of the academic calendar. Research must allow enough time for that change to have reasonably occurred, before assessing the impact of an intervention. To be sure, some outcomes like attendance can be measured weekly or even daily. Assessing early trends is consistent with a DARPA-like model that may abandon a project if early outcomes are not achieved. However, more complex outcomes, like reading skills, need more time to develop. Testing for impacts too soon is not a fair test—it risks abandoning worthwhile interventions before they could reasonably have shown their effectiveness.

Making publication and conference attendance costs unallowable undercuts a pivotal process for upholding quality standards

The proposed rule would make publication and printing costs unallowable (Section 200.461) and require prior agency approval for conference attendance (Section 200.432(b)). As an organization that runs a top-tier scientific journal (the [Journal for Research on Educational Effectiveness](#)) and an annual conference that includes graduate students and researchers across disciplines, we can attest to the value of a journal and conference for pushing on ideas until they meet a critical standard.

The peer review process is a key quality control mechanism, ensuring that the scientific literature includes findings that have been vetted and debated. If recipients cannot use time in their grant to work on a journal submission (§200.461), less research may get published in a peer-reviewed journal. Yet taxpayers deserve to see the results of publicly funded research. Disseminating research in scientific journals ensures that the findings are vetted for quality and available for use by policy makers and the public.

If less research is vetted and published, decisionmakers will turn to self-published white papers or blogs that have had no external review (§200.454). This undermines the marketplace of ideas. It will take substantially longer for credible and reliable research findings to be distinguished from unsubstantiated anecdotes and claims. This will leave policymakers and practitioners little high-quality information with which to create policies and programs that can address the challenges and improve the lives of Americans.

Conferences are another way the scientific community monitors the quality of information that is disseminated for public use. Scientists share and discuss ongoing research, before it is made public, to ensure that findings are believable and actionable. Researchers already indicate conferences of interest in their grant applications. But as contextual trends evolve and new findings arise in the scientific inquiry process, researchers expand their network to ensure dissemination of their findings. Any researcher who secured a grant five years ago likely did not anticipate the rapid advancement of AI use in educational settings. Requiring government permission to attend a conference that was not previously specified (§200.432) imposes undue burden on thousands of researchers and limits them from engaging with exactly the kind of timely questions for which parents and school leaders want answers.

Journalists also attend conferences to identify and then disseminate the best findings directly to the public. If researchers are unable to attend conferences, the public loses a key mechanism through which to learn about cutting edge scientific discoveries that could improve their lives.

Scientific conferences often introduce researchers to new tools or methods for conducting research, so that research can be done faster, cheaper, and more efficiently. Our Society's conferences and its workshops are where many people learned about new considerations in randomized controlled trials or quasi-experimental designs, and to ensure they did not make claims based on insufficient sample size or incorrect estimates.

To be clear, our Society has always upheld rigorous scientific standards and supports the nine factors in the Gold Standard Science Executive Order 14303. Our founders pioneered social science evaluation methods and for over two decades, our members have clarified the best and appropriate uses of different research designs and methodologies for different use cases and purposes. The more we publish and discuss these uses and cases, the more we are allowing the public to see the evolution of knowledge in our field.

Political review is duplicative

Political appointees already have a mechanism for prioritizing grant applications that align with administration policies and therefore do not need this rule [§200.205(b)(1)]. Grant programs establish absolute and competitive priorities and state them in the Federal Register as well as in their learning agendas. Absolute priorities guide whether an application is eligible for funding and competitive priorities award extra points to prioritize particular applications over others in the award process. Program officers already steward grants with these priorities in mind. Grant applicants consider these priorities when drafting their applications.

We encourage the continued use of scientific peer reviewers. Their perspective considers what we have learned over time and envisions a future that lasts longer than an election cycle. Reviewers can provide critical guidance to political appointees on research priorities that should be heard and heeded. Shifting which research topics are funded with every new administration would undermine the knowledge building enterprise.

Conclusion

The proposed rule limits researchers' and practitioners' ability to answer the pressing questions that parents, students, and school leaders are asking. If the rule is implemented, we will not know who is improving outcomes nor how and will miss critical windows to scale up what works.

If the administration does decide to move forward with some or all of this rule, SREE would be eager to work with OMB and the agencies to help shape implementation so as to improve evidence standards and grantmaking processes while also strengthening efficiency and effectiveness.

Respectfully submitted,

Board of SREE