



September 23, 2026

Linda E. McMahon
Secretary of Education
U.S. Department of Education
400 Maryland Ave, SW Washington, DC 20202

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

Dear Secretary McMahon,

The American Political Science Association (APSA) is writing to submit a comment regarding the Secretary of Education's [proposed rule](#) (ED-2026-OPEPD-2542) to amend the Education Department General Administrative Regulations (EDGAR) and other provisions in 2 CFR parts 3474 and 3485 including technical updates and alignment to the Office of Management and Budget's Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards or 2 CFR Part 200.

As a professional organization with over 11,000 members, APSA's core mission is to promote scholarly understanding of political ideas, behaviors, and institutions to inform public choices about government, politics, and public policy; and to enhance the capacity of political scientists to conduct research, improve teaching, and communicate their findings to wider publics. APSA's members include researchers, professors, students, and academics who maintain compliance with EDGAR to guide research grant proposals from the Department of Education, lead university departments, and pose questions for future researchers. Because this rule will greatly harm our members and how they engage with the Department of Education, we write in opposition to the proposed rule based on the serious concerns identified below.

Reasoning

The reasoning behind the rule states efforts to streamline selection criteria for the Secretary, increased interagency consistency and efficiency, reduction in costs through preferences given to applicants with lower indirect costs and alignment with the evidence framework in the Secretary's Supplemental Priorities and Definitions on Evidence-Based Literacy, Education Choice, and Returning Education to the States as well as 2 CFR 200. In actuality, the rule institutionalizes a system that enables political appointees to control the grantmaking process, diminishes independence of the proposal review process, jeopardizes the investment of time and resources toward existing and ongoing research, and infringes upon the principles of academic freedom through the potential imposition of consequences for institutions who receive federal funding.

Authority

As stated, the proposed rule claims to better align the Department's policies with recent executive branch actions, including a proposed change to 2 CFR 200 – the regulatory code overseeing federal financial assistance colloquially known as the "Uniform Guidance" – and previous executive orders for the purpose of regulatory cohesion. However, following significant backlash to the Uniform Guidance rule, a provision was included in the bipartisan "[Continuing Appropriations Act, 2027](#)" that paused the implementation of 2 CFR

200 until December 11. To adopt a framework of an unfinalized rule will only create instability to the grant process and foster confusion amongst institutions seeking programs that would be subject to the rule. It would be unwise to introduce the EDGAR proposed changes based on an unfinalized rule.

APSA strongly opposes the proposed changes to §75.901 policies for grant termination conditions and calls for immediate withdrawal of the provision. The provision permits the termination of ongoing grants, nullifying years of taxpayer money, time, jobs, and scientific advancement, for broad and unclear reasons such as "changes in priorities." It is critical that discretionary awards are protected for the duration of the grant from changing partisan control of the Executive and Legislative branches of the Federal government. Political priorities and administrations change, but this alternation does not justify the cancellation of previously awarded grants. Research grants only retain their value if they are allowed to be completed; research grants cancelled prematurely needlessly waste the funds, nullifying the Department's stated justifications. The cancellation of federal funding also leads to the destabilization of institutions, hinders administrative planning, and harms employee retention. §75.901 further infringes upon the academic freedom of institutions seeking grants. It calls for the potential suspension and termination of awards deemed "misaligned" with "program goals or agency priorities." The justifications further include alignment with the changes to 2 CFR 200, which again are unfinalized and actively being challenged.

We strongly oppose the inclusion of § 75.228, that would allow the Secretary of Education to favor applicants who propose to charge lower indirect costs than their negotiated rate. This directive aggregates decision-making power to the Secretary of Education, and disfavors institutions unable to go below the predetermined and agreed-to 15% rate. § 75.228 gives an unfair advantage to large institutions capable of absorbing additional costs, leading to smaller and under-resourced institutions being disproportionately harmed.

APSA opposes the proposed changes in ED-2026-OPEPD-2542 that institutionalize political interference into the grantmaking process. Such changes would be a disservice to the institutions that educate and enrich the lives of our future workforce. We therefore urge the Department to withdraw this proposed rule.

Sincerely,
The American Political Science Association (APSA)