



July 11, 2026

RE: OMB-2026-0034, Office of Management and Budget (OMB) Regulation for Federal Financial Assistance

Submitted via [regulations.gov](https://www.regulations.gov)

On behalf of the Higher Education Consortium for Special Education, I respectfully submit comments on the Office of Management and Budget (OMB) proposed revisions to the Guidance for Federal Financial Assistance related to the management of grants, cooperative agreements, and other forms of assistance.

The Higher Education Consortium for Special Education (HECSE) is a national organization representing university programs that prepare doctoral level personnel for leadership roles in special education. HECSE member institutions work to ensure that preparation for educating students with disabilities and supporting educators in P-12 settings is informed by research and evidence-based practice, which has demonstrated positive outcomes. HECSE institutions collaborate to support general and special education personnel in developing critical skills to teach students with disabilities that leads to full participation of people with disabilities in all aspects of society.

HECSE respectfully makes the following recommendations, based on our membership's expertise and leadership in the field of special education research and personnel preparation.

§200.205- Federal Agency Review of Merit of Proposals

Maintain a binding peer-review process. The current binding, peer-review process is structured to benefit all constituencies, including tax payers. From one administration to the next, researchers are required to respond to presidential priorities articulated in notices of funding opportunities. Peer review panels are selected to review grants based upon the content area and methodological expertise required to evaluate the merits of the grant. This is of critical importance to selecting viable projects that will contribute meaningful research that benefits constituencies, such as students with disabilities, their families, and the professionals who serve them. Grant review panels are seated and supervised by project officers from the awarding agency. Panelists are provided training to recognize evidence that the priorities stated in the notice of funding opportunity are met, and to award preference points accordingly. Preference points are significant. Without them, well developed and high scoring proposals go unfunded.

Panelists' scores are monitored, and if needed, individual panelists receive additional training. Together, we suggest this preserves and privileges presidential priorities in the grant funding process that have been identified to serve the national interests of our country while maintaining a high level of expertise in the grant review process.

§200.340- Termination and Suspension

Maintain the annual review and termination processes as mechanisms to continue grant funding. Institutions have established practices for terminating grants when standards and benchmarks are not met. These processes include submission of annual reports that include executive summaries of outcomes, progress toward meeting goals and objectives identified in the grant submission, and draw downs of grant funding. Program officers and departments vet these reports to make determinations to award additional funding, provide additional oversight, or discontinue grants completely.

Further, grants are planned with timelines that are responsive to the notice of funding opportunity and the project. Rigorous project designs require timely completion of all research activities. People involved in projects, be they personnel or participants, make commitments to the project and the goals of the project with the expectation that grants will be completed as described. Cancelling or terminating active grants at any time for any reason is disruptive and wasteful. Thus, we suggest that existing oversight maintains the integrity and rigor of research projects selected due to their potential to produce meaningful outcomes for all constituencies, including American taxpayers without an added level of uncertainty.

§200.305- Federal Payment

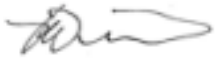
Maintain efficient, timely disbursement of grant funding. Currently, agencies distribute funding after review of annual reports that detail the grants' expenditures and the meeting of milestones. Annual reports are completed and submitted to funding agencies after careful oversight and review of institutions who house grants (e.g., institutions of higher education). While necessary, this oversight devotes resources to the production of paperwork. Additional reporting mechanisms will necessarily shift project resources to paperwork. Further, delays created from additional paperwork have the potential to create funding gaps that are disruptive to projects and services.

Conclusion

The field of special education has made incredible progress over the last fifty years since IDEA was enacted in 1975 (P.L. 94-142), and yet there is still much work to be done to ensure that every eligible child with a disability is provided with the support needed to achieve their full participation in all aspects of society. HECSE urges OMB to reconsider deemphasizing the peer review process and rather, to look to content experts, not people in political positions, to move the field forward.

Thank you for considering our recommendations.

Sincerely,

A handwritten signature in dark ink, appearing to read 'Pamela Williamson', with a stylized, flowing script.

Pamela Williamson, PhD
President