
EARLY READINGS AND QUESTIONS

A grant is never only a grant.

It is a child's program, a
teacher's pathway, a
community's capacity.

Early readings and questions about
new U.S. Department of Education
guidance



The proposal changes the rules.

The proposed EDGAR revisions create new decision points around selection, indirect costs, termination, evidence, and compliance.

The response window is limited. Start with the plain language.

PROPOSED EDGAR CHANGES

SELECTION

§75.210 • priorities + evidence

INDIRECT COSTS

§75.228 • rate reductions

TERMINATION

§75.901 • convenience

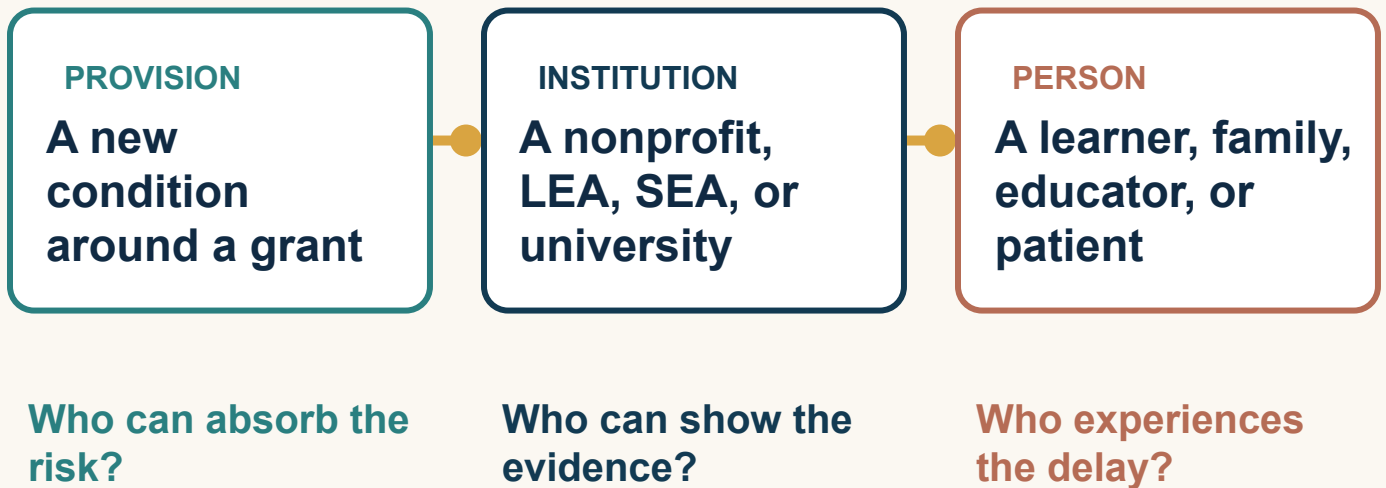
COMPLIANCE

§76.700 • executive orders

**Read it as proposed.
Then ask how far the
consequences travel.**

The route from rule to life is short.

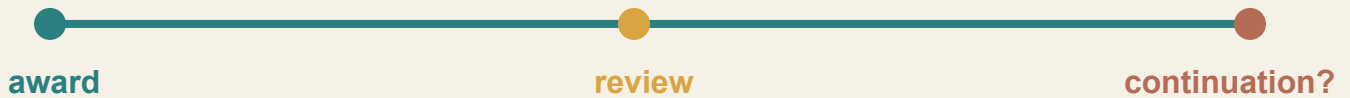
The policy may be written in Washington. The consequence is local.



Who decides?

Proposed §75.210 could give agency priorities more weight in selection and review.

What protects a multiyear award when workforce priorities move?



Who pays?

Proposed §75.228 would let applicants voluntarily reduce indirect costs.

What happens if lower recovery becomes a competitive advantage?

The gap is capacity: finance, compliance, supervision, and the work itself.



What counts as proof?

Workforce outcomes are easy to name. Disability, public-health, and long-horizon outcomes may be harder to make legible.

Which outcomes become visible - and which are left harder to see?

- literacy
- independent living
- public health
- long-term research



Whose context counts?

Rural. Tribal. Local. Specific.

A national priority can miss local conditions if selection criteria do not make room for context.

What would a fair comparison need to know?



What can change after an award?

§76.700 alignment. Continuation. §75.901 termination for convenience.

What remains stable for the people already doing the work?



A public program is made of people.

The same administrative change can land differently across the sector.

SMALL NONPROFITS

LEAs

SEAs

UNIVERSITIES

GRANTEES

BENEFICIARIES



Hold two truths at once.

The proposal may solve one administrative problem while creating another.



**Administrative
clarity may help.**



**AAU: termination
for convenience
may destabilize
multiyear
research.**

**NEA names continuity for teacher residencies, school-based
mental-health staff, and literacy interventions.**

A credible response needs more than a position.

It needs a public method for deciding what to argue.

01

Read the plain language

What does the proposal actually change?

02

Check the legal fit

What authority, discretion, and limits apply?

03

Map local effects

Who is advantaged, burdened, or made invisible?

04

Open the response

Who needs to study, document, and speak?

A credible response is a public method, not just a position.

11 / BEGIN THE WORK

Read closely. Study together. Respond early.

**Not certainty. Not
silence. A serious public
response.**

Name the clause. Show the local
consequence. Ask for a safeguard.

The window is limited. The reading
should be broad.

