



3100 Clarendon Blvd, Suite 600 | Arlington, VA 22201-5332

(P) + 1.703.620.3660 | (Toll Free) 888.232.7733 | (F) 703.264.9494

exceptionalchildren.org

July 10, 2026

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

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

The Council for Exceptional Children (CEC) appreciates the opportunity to provide comments on the Office of Management and Budget (OMB) proposed revisions to the OMB Guidance for Federal Financial Assistance governing federal funding provided to nonprofits, state and local governments, institutions of higher education, and other grantees.

CEC is a professional association of more than 36,000 educators dedicated to advancing the success of infants, toddlers, children, and youth with disabilities and/or gifts and talents. For more than a century, predating the modern field of special education, CEC has supported educators serving children with disabilities. Our members represent the full spectrum of the field, including but not limited to early childhood interventionists, special education teachers, specialized instructional support personnel, school and district leaders, pre-service educators, paraeducators, researchers, and professors in colleges of education.

CEC supports its members through the development of professional standards, professional development, dissemination of profession-related resources including new research, and advocacy in support of the Individuals with Disabilities Education Act, the landmark federal law that affords children with disabilities the right to a free appropriate public education. We provide online and in-person learning opportunities, including through our annual conference, which brings together thousands of special educators from across the country to share new research, discuss pressing topics, and engage in peer-to-peer learning.

CEC hosts the largest special education conference in the world, where professionals from across the field unite to learn from each other. Grant-funded researchers present their findings and classroom educators learn the latest strategies for serving children with disabilities. With a field that is constantly building upon and refining its craft, it is imperative that grantees continue to share the newest trends in the field and engage with their peers.

The federal government has played a critically important role in advancing the field of special education. Grants through the U.S. Department of Education have advanced the body of knowledge on topics ranging from literacy and numeracy to behavioral interventions for children with disabilities, and have supported generations of preservice professionals, from teachers working with low-incidence disabilities to doctoral students entering the fields of special education research and educator preparation. All special educators have benefited from federal research grants through the implementation of evidence-based strategies, improved instructional practices, and enhanced ability to effectively support diverse learners.

Because of the outsized impact the federal government has on the field of special education, and because CEC is soundly committed to supporting educators to foster the highest levels of achievement in the children they educate, we offer the following comments. They are aimed at making the federal



3100 Clarendon Blvd, Suite 600 | Arlington, VA 22201-5332

(P) + 1.703.620.3660 | (Toll Free) 888.232.7733 | (F) 703.264.9494

exceptionalchildren.org

grantmaking process stable, high-quality, and free from political influence, and preserving the professional learning that is essential to advancing the field of special education.

§ 200.205 Federal agency merit review of proposals.

CEC agrees with OMB that grantmaking should be an objective process and that awardees should be selected based on their likelihood to be successful in delivering results based on the program objectives. Thus, we strongly oppose OMB's proposal to de-emphasize the peer-review process, which is designed to provide unbiased scrutiny by subject matter experts, and provide excessive decision-making power to political appointees. This proposal threatens the objectivity of grantmaking by aligning it with the President's policy priorities rather than program objectives. By subjecting them to policy priorities, it also threatens the stability of grants from administration to administration, which can have a chilling effect on potential applicants who want to ensure their grants will not be subject to the will of a future administration. We urge OMB to maintain the objectivity built into the peer review process and protect federal grantmaking from subjective selection.

§ 200.305 Federal payment.

Accountability and assurance that activities funded through federal grants are consistent with measurable awards activities and outcomes are embedded into federal contracts for education-related grants. Furthermore, annual reports demonstrate progress of those activities and outcomes, and future funding is contingent on compliance with grant deliverables. Requiring additional reporting each time funding is drawn down adds an additional layer of administrative burden to the process and particularly burdens smaller grantees, such as grantees on education-related projects. Given that there are many layers of accountability built into federal grant contracts, CEC opposes adding additional paperwork burden to grantees who should be using their resources to focus on their grant deliverables.

§ 200.340 Termination and suspension.

CEC supports existing policies and procedures that allow for Agencies to terminate grants for noncompliance infractions based on failure to meet grant deliverables. However, CEC opposes additional discretionary authority to terminate grants mid-cycle based on "national interest" for the same reasons that are stated above, namely because we caution against politicizing federal grants. This discretionary authority will cause instability and insecurity among grantees and reticence to engage in federal grants that provide direct services. The harm of terminating a grant mid-cycle should not be underestimated, and it will have a chilling effect on potential applicants because of its impact on populations, including people with disabilities. The termination of a special education study funded by the Department of Education, Charting My Path for Future Success, is a prime example. The study was providing and evaluating direct services to youth disabilities in the transition from school to adulthood. Charting My Path was abruptly terminated in February, 2025, stripping 1:1 support, small group sessions, mentoring and other support to high school students in 13 school districts across 11 states. Federal grantees should be able to proceed according to grant deliverables without fear that their programs could be terminated without cause abruptly and harm the people they are working to benefit.

§ 200.432 — Conferences.

Professional conferences provided rich professional opportunities for career advancement, offering immersive learning, strategic networking, mentorship, and exposure to emerging trends. CEC is



3100 Clarendon Blvd, Suite 600 | Arlington, VA 22201-5332

(P) + 1.703.620.3660 | (Toll Free) 888.232.7733 | (F) 703.264.9494

exceptionalchildren.org

concerned that changes to this section would diminish participation in professional conferences. The proposal to require express approval by the agency as well as the inclusion of conferences in the terms and conditions of the award add additional administrative and time burden on both grantees and agency officials. These additional steps would prevent grantees from attending conferences that are announced after grant terms and conditions are agreed upon; rely on the timeliness of agency officials reviewing requests; and devalue professional conferences and the benefits they provide to attendees. CEC urges OMB to exclude these changes from the final revisions to the OMB Guidance.

Federal grants have been responsible for major gains in the field of special education over the last five decades. Federal grantmaking must be done with utmost stewardship of taxpayer dollars and must be shielded from political influence and unnecessary burden to enable future advancements, whether in special education or other critical fields.

Thank you for considering these recommendations.

Respectfully,

Chad Rummel

Chad Rummel
Chief Executive Officer
Council for Exceptional Children