



July 13, 2026

Russell Vought  
Director  
White House Office of Management and Budget  
725 17th Street, NW  
Washington, DC 20503

Re: Docket ID OMB-2026-0034, Regulation for Federal Financial Assistance

Dear Director Vought:

On behalf of the American Educational Research Association (AERA), thank you for the opportunity to provide input on the proposed White House Office of Management and Budget (OMB) Regulation for Federal Financial Assistance.

AERA is the major national scientific association of 22,000 faculty, researchers, graduate students, and other distinguished professionals dedicated to advancing knowledge about education, encouraging scholarly inquiry related to education, and promoting the use of research to improve education and serve the public good. To help meet this mission, AERA members receive scientific research and training grants from across the federal government, including the Department of Education and its Institute of Education Sciences (IES), the National Science Foundation (NSF), and the National Institutes of Health (NIH).

**Summary:** AERA urges OMB to withdraw this proposed rule. As drafted, it would insert political appointee review and undefined Gold Standard Science benchmarks into the scientific merit review process, prohibit legally authorized research on disparate outcomes and demographic variation, expand discretionary grant termination without adequate notice or appeal, and impose new financial burdens on grant recipients who present and publish their federally funded research. Together, these provisions would compromise the objectivity of federal research review, chill research that federal statute requires, and increase risk and uncertainty for current and future federal grant recipients and the broader research community.

This proposed rule would have wide-reaching implications for the field of education research, the work of AERA members, and the communities with which education researchers collaborate. The proposed rule requires significant updates to ensure the integrity of the federal scientific enterprise and to provide clarity on the intersection of statutes and administration policies that drive mission-oriented science, including in education research. We are concerned that this rule, as proposed, would result in:

- Additional financial and administrative burdens for applicants to, and recipients of, federal research grants [sections 200.432 and 200.461]
- Conflicts with statutory provisions that require work to be free of partisan influence or govern the types of research that are authorized under law [sections 200.205, 200.218, 200.300]
- Undermining scientific merit review and creating a chilling effect on federal research grant applicants and recipients to develop grants with the proposed application of political appointee review [section 200.205]
- Confusion and uncertainty among federal research grant applicants, peer reviewers, and grant recipients on the intersection of the application of Gold Standard Science principles with current scientific merit review processes [section 200.205]
- Putting current and future federal research grant recipients at risk of being precluded from consideration for future federal grants due to increased flexibility for discretionary grant termination and proposed lack of a notification and appeal process for affected grantees – negatively affecting scientific innovation and quality [sections 200.206, 200.340, 200.341, 200.342]

Additional details are provided below by section.

**[200.205] – Federal Agency Merit Review of Proposals:** We are primarily concerned about two provisions included in this section on political appointee review and the application of Gold Standard Science principles to grant applications and awards.

**Political appointee review: We urge OMB to remove the application of political appointee review as part of the pre-issuance review process for federal scientific grants.**

The determination of whether a grant advances the President’s policy priorities would put public trust in federally funded research at risk by introducing partisan and ideological biases. The inclusion of political appointee review would also conflict with agency missions and statutory requirements emphasizing scientific merit that guide the work of federal research agencies. Most relevant for federally funded education research:

- The Education Sciences Reform Act (ESRA) states that as part of the IES mission, IES’s research, statistical, and evaluation activities must be (underlined for emphasis) “objective, secular, neutral, and nonideological and are free of partisan political influence and racial, cultural, gender, or regional bias.”<sup>1</sup> This provision in law would be in direct conflict with determining whether an IES research grant would advance the President’s policy priorities.
- NSF’s mission established under the National Science Foundation Act of 1950 is “to promote the progress of science; to advance the national health, prosperity, and welfare; to secure the national defense; and for other purposes.” The

---

<sup>1</sup> 20 USC 9511(a)(2)(B)

America COMPETES Act of 2010 later established the broader impacts criterion alongside scientific merit in NSF's merit review, which includes the goals of improved preK-12 STEM education and teacher development and improved undergraduate STEM education.<sup>2</sup> Congress affirmed the broader impacts criterion in the bipartisan 2022 CHIPS and Science Act.<sup>3</sup>

We are also concerned that pre-issuance review by political appointees would place final funding decisions into the hands of non-subject matter experts without the appropriate background on the current state of science, appropriate research methodologies, or understanding of prior research advances. The proposed political appointee review would also put at risk the integrity of the scientific merit review process that includes independent expert evaluation of proposals.

The political appointee review also conflicts, on its face, with the Gold Standard Science principle of "Subject to Unbiased Peer Review." Although we seek clarification on how the Gold Standard Science principles would be applied across federally funded scientific research, the description provided for the peer review principle in the White House Office of Science and Technology Policy (OSTP) guidance for Gold Standard Science notes:

"Research proposals should undergo independent, impartial peer review, guided by clear, transparent evaluation criteria and standardized, streamlined processes to ensure objectivity and consistency. Agencies should ensure appropriate reviewer selection, prioritizing expertise, independence, and viewpoint diversity, and adopt double-blind review where appropriate, with clear disclosure of potential conflicts of interest."<sup>4</sup>

Based on this description, it is unclear whether the political appointee will have the background and expertise needed to assess whether a research grant proposal adheres to Gold Standard Science principles in the pre-issuance process, especially as the "impartial peer review" would already have taken place.

Gold Standard Science: The general tenets of Gold Standard Science are ones that AERA members embed in their work, including transparency, collaborative and interdisciplinary science, and conducting science without conflicts of interest. In addition, AERA has highlighted the importance of reproducibility and accepting negative results as positive outcomes as part of education research.<sup>5</sup> However, it is uncertain how federal agencies will apply the Gold Standard Science principles in the review of grant applications and through their intersections with current criteria guiding application peer review and award decisions within federal scientific agencies.

---

<sup>2</sup> 42 USC 1862p-14

<sup>3</sup> 42 USC 19051

<sup>4</sup> <https://www.whitehouse.gov/wp-content/uploads/2025/03/OSTP-Guidance-for-GSS-June-2025.pdf>, p. 5

<sup>5</sup> Herrington, C.D., & Maynard, R. (Eds.). (2019). Randomized Controlled Trials Meet the Real World: The Nature and Consequences of Null Findings [Special issue]. *Educational Researcher*, 48(9).

Since 2018, IES has implemented the Standards for Excellence in Education Research (SEER) to encourage practices in IES-funded research for study pre-registration, open access principles, cost-analysis of interventions, generalization of study findings, and scaling promising effective practices.<sup>6</sup> While many of the SEER principles are aligned with the tenets of Gold Standard Science, it is unclear how IES will implement Gold Standard Science principles alongside SEER, especially as IES has not announced new research or training grant competitions since 2024.

Similarly, NSF, in partnership with the National Science Board (NSB), recently underwent a process to update its merit review criteria. The final report released in December 2025 included a recommendation for NSF and NSB to “maintain the two current review criteria, presently named Intellectual Merit and Broader Impacts, refine the definitions of each criterion, and clarify the use of additional review considerations.”<sup>7</sup> NSF is also currently advancing updates to its Proposal and Award Policies and Procedures Guide (PAPPG), through a proposed NSF Guidance on Financial Assistance that affirms the NSF merit review criteria for grant applicants, grant reviewers, and NSF program officers.<sup>8</sup> As with the IES SEER Principles, there is no indication of how the NSF merit review criteria would intersect with the Gold Standard Science principles, including for grant competitions – such as the EDU Core Research and Improving Undergraduate STEM Education programs – that are currently accepting proposals.

NIH also recently launched a request for information for measuring and rewarding scientific impact for NIH-funded research, aligned with the OSTP Gold Standard Science guidance for agencies to develop standardized metrics and evaluation.<sup>9</sup> However, this appears to be the only agency that we follow that has been developing metrics; thus, it is unclear how metrics agencies develop will be used in determining past performance during future consideration of grant proposals.

With the ongoing efforts across federal agencies and OSTP to implement Gold Standard Science principles and their intersection with current merit review policies and procedures, **we urge OMB to delay the effective date of the inclusion of benchmarks for meeting Gold Standard Science as part of the consideration of pre-issuance review.** Any benchmarks and measures should be developed in consultation with the scientific community, such as the current NIH process, and based on evidence.

We are also concerned that the types of acceptable research methodologies may be limited under the Gold Standard Science principles. **OSTP, in collaboration with OMB, should clarify that numerous quantitative methods, quasi-experimental designs, qualitative research, and mixed-methods research approaches, among other**

---

<sup>6</sup> <https://ies.ed.gov/use-work/standards-excellence-education-research-seer>

<sup>7</sup> <https://nsf.gov-resources.nsf.gov/files/Merit-Review-Changing-Landscape-2025.pdf>, p. 19

<sup>8</sup> <https://www.regulations.gov/document/NSF-2026-OTR-0001-0003>, p. 105.

<sup>9</sup> <https://grants.nih.gov/grants/guide/notice-files/NOT-OD-26-087.html>

**research methods beyond randomized control trials, meet the standards of Gold Standard Science.**

In addition to these two larger issues, AERA also notes concerns with two of the preferences proposed as part of the pre-issuance review process that would undermine scientific merit review:

1: [202.205(b)(3)]: The proposed preference under the pre-issuance review to award grants to institutions with lower indirect cost rates would undermine the scientific merit review process. **We urge OMB to remove this consideration for scientific research grants.**

2: [202.205(b)(4)]: In addition, we are concerned that the pre-issuance preference to select awardees on the basis of “recipients likely to produce immediately demonstrable results and recipients with the potential for potentially longer-term, breakthrough results,” would also undercut the scientific merit review process.

As this would be a pre-issuance consideration after the peer review process, we are concerned that a political appointee would not have the appropriate expertise to gauge the likelihood of a federal scientific grant proposal to advance science and innovation. As it stands, this principle may be interpreted in a way that would deprioritize fundamental science and longitudinal studies. In these cases, the results may not be immediate but would continue to make significant contributions to advancing scientific knowledge and developing future innovations. The federal investment in fundamental science and longitudinal studies have been critical to producing technologies that are used in classrooms, developing effective instructional strategies that have resulted in improved academic outcomes in reading, and understanding the impact of evidence-based education policy and practice on student and teaching outcomes over time. **We thus urge OMB to remove this consideration for scientific research grants.**

**[200.206] - Federal Agency Review of Risk Posed by Applicants**: In the overall view of the updates included in this proposed rule, we are concerned about the expanded components of the “History of Performance” criterion as part of the risk review in the pre-award process. This proposed update is particularly relevant for NSF grantees who saw grants terminated unexpectedly last year due to being deemed to “no longer effectuate program goals or agency priorities.” It is unclear whether and how these terminations would be considered as part of the history of performance for principal investigators who plan to apply for future federal research grants.

With the expanded flexibility and criteria proposed for the discretionary termination of grants, this risk review will likely harm on future consideration of federal funding for those who have had their grants terminated under this category. **We urge OMB to clarify that principal investigators (PIs) who were notified that their grants were terminated under the “discretionary” rationale, particularly for those who had their grants terminated for this reason prior to this proposed rule, would not be at risk for future federal funding.**

In addition, for federal research grants where the Gold Standard Science principles would apply, other provisions in this proposed rule (sections 200.432 and 200.461) would place increased financial burdens on federal research grant recipients to disseminate the findings of their federally funded research. If federal research grantees have reduced capacity or are unable to present research at conferences or publish their work in peer-reviewed scholarly publications in the absence of allowable use of federal funds, this would conflict with having benchmark performance metrics to assess commitment to Gold Standard Science. **We urge OMB to revise the “History of Performance” criterion to clarify the connections between Gold Standard Science benchmarks and how they may affect future consideration for federal research grants.**

**[200.218] – Prohibition of Using Federal Awards to Promote or Support Theories of Disparate-Impact Liability:** On a broad scale, there appears to be a disconnect between the activities that federal agencies are mandated to conduct under law and the proposed provision prohibiting “disparate-impact studies.” The lack of clarity in the definition and of how this definition would be applied to federal education research grant proposals and awards would create further confusion for agencies in meeting their statutorily required obligations.

Under ESRA, the National Center for Education Research (NCER) within IES has as part of its mission sponsoring research that leads to knowledge to “close the achievement gap between high-performing and low-performing students through the improvement of teaching and learning of reading, writing, mathematics, science, and other academic subjects.”<sup>10</sup> The research needed to understand the extent of the achievement gap and what interventions are successful in improving student outcomes – including closing achievement gaps – require the consideration of demographics in data collection, analysis, and reporting.

The CHIPS and Science Act includes language throughout that mandate NSF to conduct broadening participation activities with the goal of ensuring that underrepresented populations in STEM have access to education, mentorship, and capacity-building activities supported with NSF funding. As one example, the law states that NSF awards for research on effective approaches to engaging students in preK-12 informal STEM education activities include “students from groups historically underrepresented in STEM and rural students,” to broaden participation for those groups in the STEM workforce.<sup>11</sup> Other examples of this work authorized in the CHIPS and Science Act include:

- As part of the National STEM Teacher Corps, awarded alliances have as part of their duties, “recruiting eligible applicants, with a focus on recruiting diverse

---

<sup>10</sup> 20 USC 9531(b)(1)(C)

<sup>11</sup> 42 USC 1862q

STEM educators to advance equity based on race, ethnicity, sex, socioeconomic status, age, disability status, geography, and language ability”<sup>12</sup>

- NSF support for research in undergraduate STEM education that includes activities to “increase the size, diversity, capability, and flexibility of the STEM workforce”<sup>13</sup>
- NSF support for research in STEM graduate education that examines the outcomes of mentoring and professional development interventions and policies on degree completion, including by sex, race and ethnicity, and citizenship<sup>14</sup>

The proposed rule states that federal statute would govern in instances where there are conflicts with the regulations. Nevertheless, we are concerned that federal education research grant activities authorized under current law to examine variations in outcomes among different student and educator populations would not be funded because they would be considered “disparate impact studies” when, in fact, the studies intend to examine groups with the goal of supporting access to quality STEM learning opportunities for all students.

This concern extends to a current lack of clarity on whether a broad application of “disparate impact studies” would extend to the use of federal education statistics (including data collected and reported by the National Center for Education Statistics) in research. Regardless of whether research is conducted with or without federal research funding support, it is uncertain whether the proposed prohibition on disparate impact studies would apply to analysis of disaggregated federal data based on different demographic characteristics, further weakening the scientific integrity and value of the research. As one example, it is not clear whether research initiatives such as the AERA-NSF Grants Program would be prohibited from using innovative and rigorous scientific methods to produce research that allows for group level comparisons. **We urge OMB to remove this provision to reduce confusion among grant applicants, peer reviewers, grant recipients, and federal program officers and for compliance with statutory requirements.**

#### **[200.220] – Prohibition of Using Federal Funds for Covered Foreign**

**Collaborations:** We are concerned that this provision would limit international collaborations among education researchers. The scientific enterprise relies on open exchange of knowledge, and AERA members are among those in the scientific community who actively work with international scholars, and our members include international scholars. Although the provision would apply to covered foreign countries noted in law, the added stipulation that the definition of a covered foreign country would apply to those listed in Executive Orders broadens the scope of the countries this provision could apply to and may disrupt ongoing foreign research collaborations in the future. **We urge OMB to remove this provision.**

---

<sup>12</sup> 42 USC 18991(c)(6)(B)

<sup>13</sup> 42 USC 18992(a)(3)

<sup>14</sup> 42 USC 18993(c)



**[200.300] – Statutory and National Policy Requirements:** Similar to the comments provided in response to section 200.218 on “disparate impact studies,” we are concerned about the potential broad scope of the application of “DEI(A)” to federally funded research, including for activities explicitly authorized under law. The language to prohibit the use of federal funds to “fund, promote, encourage, subsidize, or facilitate” activities under an undefined broad category of “DEI(A)” would place a chilling effect on federal support for research that is both legally compliant and that would provide an understanding of academic and nonacademic student outcomes by race, ethnicity, or disability status, among many backgrounds – understanding that is necessary for supporting positive adjustment and quality educational access for all students and communities. **We urge OMB to remove this provision as a consideration of federal funding.**

We are also concerned about the proposed prohibition on “gender ideology,” due to the potential implications that this would have for federally funded research that examines gender (for example, comparative studies across gender groups, within-group studies of boys or girls) and that includes LGBTQ+ populations. The language to prohibit the use of federal funds to “fund, promote, encourage, subsidize, or facilitate” non-defined “gender ideology” would place a chilling effect on understanding academic and nonacademic outcomes across and within gender groups. The chilling effects would be exacerbated for the most vulnerable and understudied communities such as LGBTQ+ students and in understanding the experiences of LGBTQ+ educators and parents as part of education systems. **We urge OMB to remove this provision as a consideration of federal funding.**

**[200.340] – Termination / Suspension:** We are deeply concerned with the proposed increased flexibility that would be provided to terminate grants mid-cycle under the “discretionary termination” category. While this is proposed to be in effect on October 1, we have already seen the use of discretionary termination and its ramifications for federal research grants that were terminated under this category. Last year, AERA members and the communities with which they work experienced firsthand the impact of grant terminations of NSF-funded STEM education research and STEM education programs in multiple ways: reduced access to STEM education interventions, disruption of partnerships between researchers and schools and communities, and the loss of financial support for graduate students who were funded through federal grants awarded to principal investigators.<sup>15</sup>

The application of this expanded discretionary termination authority to federal research grants would pose significant challenges for long-range planning, partnerships between researchers and practitioners, and data collection and analysis. The increased flexibility to terminate grants would also result in increased waste of federal spending due to the disruptions made mid-cycle in producing scientific innovation and, particularly in the case of education research, abandoning supports and dismantling capacity for promising effective practices for teaching and learning.

---

<sup>15</sup> <https://democracyforward.org/wp-content/uploads/2025/06/NSF-complaint-061825.pdf>



Combined with the subsequent sections on notification and appeals process, there would be significant increased risk for current federal research grant recipients who may have their grants terminated under this category for unclear and shifting reasons to be considered for future federal grant opportunities. A key example is the lack of definition of what foci would be in “national interest.” In the absence of defining “national interest” and clear statements on program goals and agency priorities, applicants for and recipients of federal research grants – and their sponsoring institutions – will not have clear expectations for conducting their work. This would have a chilling effect on the timely submission of proposed studies critical to knowledge production and effective interventions. **OMB should require that federal agencies make clear the “program goals, agency priorities and national interest,” in the notice of funding opportunity to provide clarity to grant applicants in the proposal process.** We remain concerned, however, that research grants will be terminated on an arbitrary basis even if federal research grant applicants and recipients have this information up front.

**[200.341] – Notification of Termination Requirement:** AERA urges OMB to update language to require that federal agencies provide the rationale for discretionary termination when a federal agency deems that a federal research grant does not effectuate program goals, federal agency priorities, or the national interest in the notification of discretionary termination.

An explanation should also include a reference to the specific program goal, agency priority, or national interest that the grant no longer effectuates that is the basis for the discretionary termination and included in the notice of funding opportunity, as noted in the prior section. Without this detail, we are concerned that a grant recipient who receives a notice of discretionary termination would be flagged as a risk (see section 200.206) to receive a federal grant in future research competitions. In addition, the lack of rationale for an agency’s discretionary grant termination would prevent federal research grant recipients from effectively objecting and appealing termination decisions.

**[200.342] – Opportunities to Object, Hearings, and Appeals:** AERA is deeply concerned with the proposed provision to limit the opportunity to object or appeal termination and suspension of federal research grants solely to issues of noncompliance. **We urge OMB to update language in this section to require agencies to provide an opportunity to appeal a discretionary grant termination.** Federal research grant recipients who receive a notification of discretionary termination should be able to appeal the grounds and rationale (aligned with the prior section on written notifications) for the termination.

As noted in our comments on section 200.340, the opportunity to appeal should be in response to the specific program goal, agency priority, or national interest that the grant no longer effectuates as stated in the notice of funding opportunity and the notification for discretionary termination. Allowing the opportunity to appeal would also enable

affected federal research grant recipients to reference research that is allowable and authorized under law.

**[200.432] – Conferences: AERA urges OMB to maintain current OMB guidance language that allows federal grant funding to be used to support presentations of federally funded research at conferences. We also recommend that OMB remove the proposed language requiring agency approval of federal grant recipients to include specific conferences that they are planning to attend to present research findings as part of the terms and conditions of the grant.**

We anticipate that the proposed general prohibition of using federal funds to present research findings at conferences (such as the AERA Annual Meeting) would have a disproportionate impact on graduate students and early career scholars whose presentations at conferences are necessary to their receiving peer feedback and in advancing in their careers. In addition, as part of the terms and conditions of receiving a federal research grant, grant recipients are required to disseminate their work. As one example, the scientific merit review for IES includes an examination of the plan for engagement and the dissemination of research findings with stakeholders.<sup>16</sup> IES has more recently included in its funding opportunities a strong encouragement of engagement with a broad range of stakeholders to inform research questions and for discussion of IES-funded research findings.<sup>17</sup> We are also concerned that this provision would place a significant burden on federal grant recipients to justify the use of funds to present the findings of federally funded research.

In addition, we are concerned about unintended consequences if a grant recipient is unable to present at a conference where funding would be approved for anticipated attendance and is included in the grant terms and conditions. For scientific societies like AERA, presentation of research is contingent on a rigorous peer review process where paper proposals are accepted or declined based on the scientific merit of the work. If a federal grant recipient is approved to use funds to attend an AERA Annual Meeting but does not have their federally funded research accepted in the peer review process to present, it is unclear whether that would be a consideration in terminating the grant mid-cycle or if it would affect the ability to receive future federal grants.

There are also potential unintended consequences for scientific societies that receive federal funding to support research activities where funds currently used to cover costs related to conference attendance are integrated into the required training components of receiving a grant. As an example, the AERA-NSF Grants Program supports research and dissertation grants to education researchers using large-scale data for their

---

<sup>16</sup> This is described on p. 53 of the FY 2025 Request for Applications for Education Research Grants: <https://ies.ed.gov/sites/default/files/ncer/document/2024/10/Education%20Research%20Grants%20Program%2028FY%202025%29%20E2%80%942084.305A.pdf>.

<sup>17</sup> The most recent Request for Applications for the FY 2025 Education Research Grants program within NCER notes that as part of the dissemination and engagement plan, “The plan should articulate how the applicant, if funded will, (1) elicit input from learners, educators, policymakers, researchers, parents/caregivers, and/or other relevant audiences.”

research. As a condition of funding, grant recipients are asked to present their research at the AERA Annual Meeting and participate in the AERA-NSF Grants Program Fall Research Conference. Currently, the NSF grant funds support the ability for Grant Program awardees to attend both conferences. If NSF determines that funds would no longer be allowable for this purpose, consistent with this proposed provision, AERA would need to use its own limited resources to support awardee conference attendance or significantly change programming for its grantees. As AERA could not fully bridge such award gaps, the net result would be decreased opportunities for early career scholar awardees/participants to strengthen their work, make impacts through their work, and develop the peer networks essential to career advancement.

**For these reasons, we urge OMB to continue to allow federal grant funding to be used to enable PIs and their research teams to present the findings of their federally funded research.**

**[200.461] – Publication and Printing Costs: AERA urges OMB to remove language that would prohibit the use of federal funds for article processing fees or related charges to make federally funded peer-reviewed publications publicly accessible.**

As noted above with conferences, federal scientific agencies require the dissemination of federally funded research findings, with publications as one important way to advance research. At the same time, federal agencies have been implementing the OSTP memorandum, “Ensuring Free, Immediate, and Equitable Access to Federally Funded Research,” including updating public access policies that require federally funded research to be made publicly available upon its publication.

Current regulations and practices by federal scientific agencies for education research to facilitate public access to federally funded research aligned with OSTP policy include:

- The IES Public Access Plan for Department of Education requires grantees who publish federally funded research to submit their final peer-reviewed scholarly publication to its Education Resources Information Center repository upon publication acceptance. In addition, grantees are required to make the data underlying the findings in a federally funded peer-reviewed publication publicly available under provisions of privacy and confidentiality.<sup>18</sup>
- The NSF PAPPG was recently updated to ensure that final peer-reviewed scholarly publications are available upon publication in NSF’s Public Access Repository.<sup>19</sup> In the proposed updated NSF Guidance on Financial Assistance, this requirement would still apply.<sup>20</sup>

It would go against the spirit of the federal government’s commitment to making federally funded research publicly available upon publication to disallow grant funds to disseminate research results. In addition, as federal scientific agencies implement the Executive Order on Gold Standard Science, this would be at odds with the general

---

<sup>18</sup> <https://www.ecfr.gov/current/title-34/subtitle-A/part-75#75.623>

<sup>19</sup> <https://www.nsf.gov/policies/document/pappg24-1-supplement-2>

<sup>20</sup> <https://downloads.regulations.gov/NSF-2026-OTR-0001-0003/content.pdf>, p. 188.

principles of reproducibility and transparency. The OSTP guidance stated that transparency “complements reproducibility by ensuring that the materials and processes needed to replicate studies are accessible and clearly reported.”<sup>21</sup>

As AERA noted last year in consideration of proposals for the use of NIH funds to cover publication costs for NIH-funded research, prohibiting the use of federal funding to cover publication costs would create financial burdens and an unfunded mandate for education researchers who publish findings from federally funded research in peer-reviewed journals.<sup>22</sup> This provision in the proposed rule would have particularly disproportionate impact on graduate students, early career scholars who have increased pressure to publish to advance in their careers, as well as researchers from less research-intensive or resourced institutions.

AERA members publish articles in journals that span organizations that are both research-oriented and practice-oriented, in addition to AERA’s seven journals which are all regarded as high impact journals by scientific metrics. This prohibition would also affect AERA’s own journal publications where education researchers seek to publish their federally funded work and pay article publishing fees to enable required public access. On average, 21 percent of articles published in AERA’s seven journals are the product of federal funding, with 33 percent of articles published in AERA’s open access journal, AERA Open, resulting from federally funded research.

**For these reasons, we urge OMB to remove this language to maintain current practice for federal funds to be allowable for costs related to publishing federally funded research.**

Please do not hesitate to contact me if you have any questions or need any additional information on how this proposed rule will impact education researchers. **Given the scope of ramifications that this proposed rule would have on AERA members and the field of education research, we urge OMB to withdraw this proposed rule in its entirety.**

Sincerely,



Tabbye M. Chavous, PhD  
Executive Director  
[tchavous@aera.net](mailto:tchavous@aera.net)

---

<sup>21</sup> <https://www.whitehouse.gov/wp-content/uploads/2025/03/OSTP-Guidance-for-GSS-June-2025.pdf>, page 2.

<sup>22</sup> <https://www.aera.net/Portals/38/AERA%20Comments%20on%20NIH%20RFI%20on%20Allowable%20Publication%20Costs%20%28FINAL%29.pdf>