



## Regulation for Federal Financial Assistance

**Monique Anair**, Santa Fe Community College

Dear Mr. Vought:

Thank you for the opportunity to comment on Proposed Rule: Regulation for Federal Financial Assistance (OMB-2026-0034; FR Doc. 2026-10817). The proposed changes to government-wide grant policies will have profound consequences and I am writing to oppose these changes and share my viewpoint as a U.S. citizen and educator.

I write to you in my capacity as a career and technical education teacher, researcher, and program administrator. I work with and manage multiple federal grants that connect to current federal and state government efforts to increase skilled trades training at high schools and community colleges. These programs work across non-profit and corporate entities that directly impact our children's lives.

The current grants I work with were awarded by multiple agencies and programs, including the National Science Foundation's (NSF) Advanced Technological Education (ATE) program, the State Apprenticeship Expansion Formula (SAEF) grant, and the Training for Residential Energy Contractors (TREC) grant. The research gathered through these publicly funded projects engages multiple service providers, generating essential data on and insight into U.S. workforce and economic development initiatives. My experience with this wide grant portfolio leads me to believe that these regulatory changes, as currently proposed, will negatively impact research that spurs open innovation in the United States, directly impacting economic development and education.

### Areas of Concern

**The proposed changes described in §200.218** will negatively impact a growing body of essential education and socioeconomic research. Disparate-impact frameworks reveal when policy effects differ between groups; without these methods, we lose information that is necessary for understanding when and why interventions work. The wholesale dismissal of public health, environmental science, and social sciences research that employs these methods means that we will lose critical knowledge that is essential to workforce development and training. For example, the current cross-sectional research being done on the health of America's youth is critical to ensuring we have healthy workers for essential industries that underpin the United States' global economic success. Cross-sectional research studies that combine ethnographic, social science, and environmental justice directly impact programs like the U.S. Army's Future Soldiers program (Filkins, 2025), a key contributor to increasing recruiting numbers. This proposed change also violates the principles of open innovation research. In my current work, open innovation research advocates for the development of responsive workforce programs, which requires attention to disparate impacts between students of different backgrounds. Narrowing, isolating, and eliminating permissible research methods will harm the United States

in the long run by preventing us from fully understanding how policies work in practice.

**In §§ 200.204 through 200.206**, “OMB proposes a variety of changes designed to ensure and emphasize the need for merit-based selection of recipients for discretionary awards,” but systems of meritocracy inherently perpetuate policy inequity (Pruitt and Flores, 2021), so this emphasis on merit risks replicating the very kind of biased practices that the government proposes to eliminate in **§200.218**. In my experience as an educator, my students do not come to my classroom having lived equitable experiences, and I have found that systems of meritocracy serve those who already have advantages. My current workforce development work primarily assists men aged 18–35 who attempted college but stopped-out by their third semester, before later returning to postsecondary education for hands-on skills training in an attempt to increase their earning power. These men did not benefit from our state’s meritocracy policies that were in place at the time they came of age. Based on my professional experience, my viewpoint is that policies based on meritocracy have disparate impacts and may contribute to inequities that the proposed changes are intended to address.

## Changes Are Needed, but Should Be Considered Carefully

Current U.S. government leaders should consider what they can do to support better and more informed practices in publicly funded research. Federally funded researchers are governed by **research standards and practices** developed by the U.S. Department of Health and Human Services (HHS). These rigorous certification processes are required by universities across the United States. Current Institutional Review Board (IRB) processes provide oversight to researchers undertaking research studies, and all review members and those who apply to the IRB must have HHS sanctioned certifications. The U.S. government could improve these processes by requiring and funding additional education to ensure that the **Belmont Report’s** ethical principles and guidelines for human subject research are followed and practiced by everyone engaged in conducting publicly funded research. In my experience, when working outside of the traditional research university environment, very few organizations have the resources to obtain the necessary training and certifications that inform ethical practices and ensure the responsible use of public dollars through ongoing research projects.

## Final Thoughts

If implemented as proposed, these changes could have significant long-term consequences for our children by weakening the research ecosystem that informs educational innovation, workforce development, and evidence-based policies. Reduced investment in current research will limit our ability to understand and address complex and interconnected factors that influence academic success, physical and mental health, and future economic opportunities. Over time, these changes will hinder the development of effective educational practices and diminish our nation's capacity to foster innovation, economic growth, and global competitiveness. In an increasingly complex and competitive world we need more discoveries and advancements to prepare our children—and thus our nation—for future success.

Sincerely,

Monique Anair, EdD