

Regulation for Federal Financial Assistance

Cheron H. Davis, Florida Agricultural and Mechanical University

Dear Mr. Vought:

I am Dr. Cheron H. Davis, Associate Professor of Reading Education, a literacy researcher, and a teacher educator whose work focuses on evidence-based literacy instruction, teacher preparation, and educational opportunity. I submit these comments in my individual capacity; the views expressed here are my own and do not necessarily represent those of my university or any affiliated organization.

I strongly oppose the proposed revisions to the Regulation for Federal Financial Assistance. At a time when the United States faces persistent literacy challenges, federal grantmaking should strengthen—rather than weaken—the role of independent expertise, credible evidence, and methodological rigor.

Proposed § 200.205 is especially concerning because it would require senior political appointees to exercise independent judgment rather than routinely defer to expert reviewers, while expressly treating peer-review recommendations as advisory. Political leaders appropriately establish lawful national priorities, but they should not substitute political acceptability for disciplinary expertise when assessing a proposal's research design, evidentiary basis, feasibility, or potential contribution. In literacy research, this could disadvantage studies examining achievement gaps, culturally and linguistically responsive instruction, teacher-preparation quality, or the needs of historically underserved students—not because the studies are methodologically weak, but because their questions or findings are politically disfavored.

The practical consequences would extend well beyond individual investigators. A high-quality study of an early literacy intervention, for example, may require sustained data collection over multiple school years to determine whether initial gains endure and whether the intervention is effective across diverse communities. Under proposed § 200.340, an agency could terminate a discretionary award when it determines that the project no longer advances current agency priorities or the national interest. Even when the research remains scientifically sound and compliant, such a termination could interrupt services at partner schools, strand longitudinal data, disrupt graduate student training, undermine commitments made to families and districts, and waste federal funds already invested in the project.

The proposal also risks narrowing the range of questions researchers can ask. Proposed § 200.218 would restrict federal support for work using disparate-impact theories or analytical frameworks. In education, researchers routinely examine whether policies or instructional systems produce different outcomes across student groups. Preventing federal support for such analyses would make it harder to identify where programs are working, where they are failing, and which students are being left behind. That is not a safeguard against poor science; it is a constraint on the evidence policymakers and educators need to improve public systems responsibly.

Other provisions would further weaken the research infrastructure on which sound public decision-making depends. Restrictions affecting publication costs, access to scholarly literature, conference participation, and international collaboration could delay dissemination, limit peer scrutiny, and isolate U.S. researchers from important developments in their fields. These burdens would fall particularly heavily on public universities, minority-serving institutions, early-career scholars, and researchers working with limited institutional resources.

Federal agencies should retain authority to ensure that awards comply with law and advance clearly stated program purposes. However, that authority should be exercised through transparent criteria, meaningful expert review, stable award conditions, and appropriate due process—not through mechanisms that make scientific merit subordinate to shifting political priorities.

I respectfully urge OMB to withdraw or substantially revise the proposed rule. At minimum, OMB should preserve the central role of expert peer review in merit determinations; narrow any discretionary termination authority and provide meaningful procedural protections; remove restrictions that categorically disfavor lawful research methods or subject matter; and protect reasonable costs associated with publishing, accessing, and presenting federally supported research.

The nation's literacy challenges demand more trustworthy evidence, not greater political control over which questions may be studied or which findings may be supported. When scholarly judgment is displaced by ideology, public trust erodes, research capacity declines, and students and communities ultimately bear the cost.

Sincerely,

Cheron H. Davis, Ph.D.

Associate Professor of Reading Education