



September 23, 2026

Zachary Rogers
Senior Advisor
Office of Planning, Evaluation and Policy Development
U.S. Department of Education
400 Maryland Avenue SW
Washington, DC 20202

Re: Docket ID ED-2026-OPEPD-2542, Education Department General Administrative Regulations

Dear Mr. Rogers:

Thank you for the opportunity to comment on the U.S. Department of Education's (USED) proposal to revise its existing Education Department General Administrative Regulations (EDGAR). As non-profit professional society leaders at the American Association of Physics Teachers, we are concerned about several of the changes being proposed that would undermine scientific research, interfere with lawful efforts to ensure that all students thrive, shift limited resources away from those who need them most, and inject politics and ideology into USED's grantmaking and grant management processes. For these reasons and for the specific comments below, we urge USED to withdraw this proposal.

Section that would enable the Department of Education to terminate or suspend grants "for convenience." (75.901)

AAPT has received federal support to develop and deliver programs and activities supporting the physics education community. Full- and part-time staff are partially or fully supported by federal grants. In the past, federal funding allowed AAPT to develop programs that address the full spectrum of physics education from K-12 through graduate education, as well as teacher preparation.

We have experienced firsthand the impact of the sudden cancellation of federal funding mid-grant when two of our federal grants were cancelled in 2025. This caused a loss of around \$1.4 million in support for programs supporting the two-year college physics educator community and high school physics teachers. We expected these projects to positively impact 110,000 students taking physics classes at two-year colleges and over 1,800 high school physics teachers and approximately 18,000 high school students; preliminary results from this work indicated that these positive impacts were likely to result from this work. For example, one grant would have continued previous positive results connecting a teacher's supportive actions with an increase in students' future physics intentions. This continued the previously funded



work that aimed to increase the number of U.S. domestic physics majors. In addition, these grants supported two full-time staff and many other part-time employees. As a consequence of the cancellations, the research questions remain unanswered, impacting the future of physics teaching in both K-12 and two-year colleges. Volunteer labor cannot substitute paid staff labor while maintaining a high-quality delivery of programs that yield positive results.

Our membership has been similarly impacted, particularly the Physics Education Research (PER) community. The PER community collectively conducts studies on all aspects of physics education and aims to create physics environments where education is relevant and research based, materials are well-delivered, and individuals have the opportunity to appreciate and understand physics without unnecessary barriers. They have also experienced first-hand the impact of grant cancellations in 2025. This has resulted in job loss, disrupted education plans, and abrupt, premature ending of projects aimed at improving physics learning spaces from K-12 through graduate education. These cancellations harm the education enterprise in both the immediate present and foreseeable future.

Bottom line, cancelling grants mid-project is a waste of taxpayer dollars and creates uncertainty for the associations and individuals involved in the project.

Furthermore, uncertainty regarding funding will dissuade those AAPT members and staff with new ideas from submitting proposals, thus preventing innovation that will improve teaching methods and learning environments from being implemented, directly impacting the competitiveness of U.S. students and the U.S. scientific workforce.

Conclusion. We recommend that the current EDGAR be retained.

Sections shifting decisions about funding federal education grants away from grantees' performance and toward the Administration's own shifting policy preferences. (76.700)

Preparing grant proposals already requires a substantial investment in AAPT staff and member time, because AAPT and its members consider how to meet the requirements of the request for proposals. We would need to weigh whether we will submit grant proposals if they will not be funded because the administration determines that the proposal doesn't satisfy its changing policy priorities or doesn't comply with the President's Executive orders. Having proposals be reviewed in consideration of the perceived administration's policy priorities or the President's Executive orders not only undermines the scientific review process, which determines whether the individual proposals meet the priorities established in the calls, but also creates needless bureaucracy. Scientific study of teaching and learning should reflect questions of the time, previous research, and the needs of our country. Limiting what can be studied in future proposals will limit discoveries and advancement.



Conclusion. We recommend that the current EDGAR be retained.

Section on prioritizing grant applicants that lower cost rates (75.228)

Indirect cost rates fund critical operations for a project, ranging from electricity to building staff. Prioritizing grant applicants that have lower indirect cost rates is prioritizing those with significant financial resources to make up for these lower rates. This will harm education environments that serve rural and lower resourced students, because the institutions that house those grants cannot pay for the indirect costs. This means these education environments will be even more underserved, because proposals will not be submitted or funded due to the impossible conditions to operate or proposals will be uncompetitive because the projects will be severely scaled back to be manageable with fewer resources.

Conclusion. We recommend that the current EDGAR be retained.

Section on removal of “underserved populations” throughout (75.210).

The removal of “underserved populations” (§ 75.210) and elimination of two factors (§ 75.210(d)(2) and § 75.210(e)(2)) that currently list the specific barriers a project's design or personnel plan may address, including economic disadvantage, race, ethnicity, disability, national origin, and several others, would block federal funds from supporting or promoting Diversity, Equity, and Inclusion (DEI/DEIA) initiatives that are perceived to conflict with applicable Federal anti-discrimination laws. Lawful, established efforts to increase participation in subjects that are critical to the U.S. such as science may be put at risk of elimination. The Department describes this as a change made purely for internal “alignment.” But a “target” population is simply whatever population an applicant chooses to describe. The revised language has no requirements for population to include students who need the most support. That distinction matters because achievement and opportunity gaps by income, race, disability status, and English learner status remain well documented and persist, especially for subjects such as science.

Projects that increase participation already are required to follow the law. We are aware of federally-funded projects that had funding terminated, despite legal compliance. We anticipate this proposed EDGAR change would result in legally compliant projects being denied a fair chance at funding. Furthermore, the US risks excluding STEM talent to meet the current and future needs of US employers if these types of programs are not funded.

As an example, a federal award on which AAPT participated was terminated even though the project supported the success of all students, especially those who face any of the starkest barriers.. This project's goal was to systemically transform postsecondary physics and



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astronomy departments through careful examination of their policies, practices, climate, and culture in order to create law-attentive action plans, plans that include improved mentorship and more relevant physics curricula for all students. Many other physics education projects were terminated despite focusing on understanding and addressing participation in STEM and being in accordance with all applicable statutes and mandates. They were deemed to “no longer effectuate priorities” of the administration.

Conclusion. We recommend that the current EDGAR be retained.

Any final revisions to EDGAR should strengthen rather than weaken the responsible implementation of federal grants and the lawful pursuit of legitimate goals to help each and every child get the support they need to thrive. Thank you for your consideration of these comments.

Sincerely,

A handwritten signature in black ink that reads "Debbie Andres". The signature is written in a cursive style with a horizontal line underneath the name.

Debbie Andres
AAPT President

A handwritten signature in black ink that reads "Beth A. Cunningham". The signature is written in a cursive style with a horizontal line underneath the name.

Beth A. Cunningham
AAPT Chief Executive Officer