



Zachary Rogers
U.S. Department of Education
400 Maryland Ave SW
Washington, DC 20202

Docket No: [ED-2026-OPEPD-2542](#)

My name is Erin Vobornik, and as Executive Director of the National Association for the Transformation of Adult Education (NAFTAE), I am writing to offer thoughts and recommendations on the U.S. Department of Education's (ED) proposed rule to amend the Education Department General Administrative Regulations (EDGAR), which set forth the policies that govern the administration of federal education grants.

Adult education programs across our country adhere to all applicable federal, state, and local laws and guidance in serving millions of adult learners who are striving to boost their literacy, numeracy, digital and information literacy skills, workforce readiness, and acquire their high school equivalency. This critical work helps to ensure employers have the skilled workers necessary to fill in-demand jobs, subsequently strengthening the economy and ending the cycle of illiteracy and generational poverty that has trapped too many Americans for decades. In order to serve these adult learners and ensure local business and community needs are met, it is vital that funding flows to our programs as intended by Congress without unnecessary delays or disruptions, and through a non-political agency process.

NAFTAE supports efforts to promote the effective administration of federal education grants and resources. However, we are concerned that several proposed changes could create greater uncertainty for our adult education programs that rely on federal funding to provide services to adult learners and prepare them for today and tomorrow's workforce. Specifically, we are concerned about the proposed changes that would authorize ED to terminate discretionary awards at convenience (§75.901), reduce or eliminate continuation awards (§75.253) without regard to grantee performance, de-obligate excess unspent funds from a grantee during the award period (§75.251), and require grantees to comply with Executive Orders (§76.700). Additionally, the proposed rule would add a new competitive preference for applicants who propose to charge lower indirect costs than their negotiated rate (§75.228).

These proposed changes would lead to uncertainty around funding and program continuity, potentially disrupting critical services, undermining the progress adult learners have made, and limiting their ability to acquire the skills needed to fill today and tomorrow's jobs. Programs depend on stable and predictable funding to develop long-term strategies, allocate resources, hire and train teachers and staff, and deliver high-quality services. Authorizing mid-stream funding reductions, terminations, or de-obligations before a project's anticipated completion creates inefficiencies in delivering programs and services to learners, uncertainty that can hinder program effectiveness and ultimately weaken efforts to ensure adult learners gain the essential skills they



need to succeed in the workforce and beyond, and risks wasting taxpayer funds and all the effort that goes into receiving and implementing the grant award.

We are also concerned by the proposal to allow the Secretary to prioritize applicants who voluntarily accept an indirect cost rate below their federally negotiated rate. For adult education programs, indirect costs support essential functions such as administrative staff, IT systems, utilities, and facility operations. Providing a competitive preference to organizations that are willing or able to absorb these costs does not necessarily identify applicants that can deliver federal programs more effectively or efficiently. Instead, the proposed rule could incentivize applicants to under-resource the organizational infrastructure necessary to administer federal grants effectively. Adult education programs across the country already operate within constrained budgets while striving to deliver high-quality services to adult learners. By encouraging organizations to absorb operational costs, the proposed rule would weaken the organizational capacity needed to run efficient programs and ultimately support adult learners.

As you can see from these comments, the proposed rule raises weighty and complex issues that demand more time for a meaningful opportunity to review, as required by law. As such, we join with many other organizations in urging ED to extend the comment period to allow for a full analysis of all the proposed changes.

Adult education programs are the fuel that will power the future of our economy. NAFTAE urges ED to revise the aforementioned provisions. Thank you for considering our concerns and recommendations on the proposed rule. We look forward to continuing and furthering our ability to serve learners, support local businesses and communities, and strengthen our nation's economy.

Sincerely,

Erin Vobornik
Executive Director
NAFTAE