COUNCIL for OPPORTUNITY in EDUCATION

Dedicated to furthering the expansion of college opportunities for low-income, first-generation students, and students with disabilities.

TRIO Week of Action Toolkit: OMB Uniform Guidance & EDGAR

Before you start

Set aside 30 minutes between Monday, November 9 and Friday, November 13 to call and then email the education staffer for your House Representative and both Senators.

- **Who reaches out:** Any TRIO staff member can take part. Hearing from TRIO staff makes a particular difference with congressional offices, so we're especially counting on you to do your part. If your program serves several districts, divide the offices among your team.
- **Do this on your own time, not grant time.** Federal grant funds cannot be used for lobbying. Make calls and send emails outside of work time using personal resources. Speak as a constituent and professional, not on behalf of your grant hosting institution.
- **Find your staffers:** Use COE's updated congressional contacts list. Not sure who represents you? Use Find Your Member.
- **Gather your local numbers:** Know how many students you serve, the schools or communities you serve, and your recent outcomes. Use your own program's numbers, not national TRIO totals.
- **Invite the staffer to the briefing:** Every call and email should invite the staffer to the November 18 Hill briefing (details below).

Briefing details: *When ED Comes After EDGAR: What's at Stake for Students and Communities.* Wednesday, November 18, 11:30 a.m.–1:00 p.m., U.S. Capitol Visitor Center, Room 203-02. Lunch provided. Staff RSVP by close of business Monday, November 16 – use this link to register. Questions: Peter Mills (peter.mills@coenet.org) and Christian Bell (christian.bell@coenet.org).

Attach both handouts to your email: *Federal Overreach: Proposed Changes to Federal Grantmaking Regulations* and the briefing invitation.

What this means for TRIO

Two proposed rules are at the center of this week's asks. "UG" refers to OMB's proposed rewrite of the Uniform Guidance, the rules for grants across the federal government. "EDGAR" refers to the Department of Education's proposed changes to its own grant regulations. Both are dangerous for TRIO, and we're asking Congress to block both.

Below are short summaries of how the rules would affect TRIO, for you to draw on in your calls and emails. You don't need to name the specific provisions. They're listed in parentheses in case a staffer asks. Keep it nonpartisan: these rules would give the same broad authority to any future administration.

- **Students could lose services mid-program** (UG §200.340, EDGAR §75.901). Grants could be ended "for convenience" even when a program meets every obligation. TRIO serves students over years, through high school, college entry, and degree completion. A cut in the middle interrupts that.
- **Multiyear grants could become year-to-year** (EDGAR §75.253). Congress moved TRIO to five-year grants in the 2008 HEA reauthorization so programs could plan. The proposal would let ED weigh any information, not just performance, when deciding whether to continue a grant. It also drops the rule that existing grants are continued before new competitions are funded. A program meeting every goal could still see its funding cut or ended prematurely.
- **Politics over peer review** (UG §§200.205, 200.206; EDGAR §75.228). By law, ED must fund TRIO applications in order of their peer review scores, adjusted for prior experience. The proposals would require political sign-off on every discretionary award, make expert review advisory only, and give bonus points to applicants that accept a lower indirect cost rate than they negotiated. Each could move a lower-scoring applicant ahead of a higher-scoring one.
- **Federal mandates could clash with the TRIO statute** (EDGAR §§75.500, 75.210, 76.500). Undefined new rules on hiring and admissions could conflict with the eligibility requirements Congress set for TRIO, such as serving low-income and first-generation students.
- **Uncertainty makes it hard to keep staff and serve students** (EDGAR §§75.230, 75.253; UG §200.208). Late continuation decisions, partial payments, cuts based on unspent funds, or reimbursement-only payments make it hard to retain staff and plan summer and year-round programming for students.
- **Political oversight over routine costs** (UG §200.400). Empowers political appointees to arbitrarily prohibit funding for routine, essential expenditures--including organizational memberships, conference attendance, and professional development training--that are vital to the successful execution of federal grants.

(Want more information? See COE's summary of the proposed OMB and EDGAR rules and their impact on TRIO, here and here.)

The ask: Include language in the FY 2027 appropriations bill that (1) blocks implementation of the proposed OMB and EDGAR rule changes through FY 2027 and (2) require OMB and ED to engage in meaningful consultation with education stakeholders on future rules.

Your biggest worry

The email and call script both ask you to name your biggest worry and what it would mean for your students. Pick the one below that fits your program best. Use your own words if you can and add a real example if you have one.

My biggest worry is…	For our students, that would mean…
that ED could end our grant midcycle, even while we're meeting every goal	students we've worked with for years could lose their support right before they apply to or finish college
that our funding could be cut each year for reasons that have nothing to do with how we're	we couldn't promise students and families we'll still be here next year, and it would be harder to

My biggest worry is…	For our students, that would mean…
performing	retain professional staff
that political sign-off could override the peer review process	strong programs could lose out for reasons unrelated to how well they would serve students
that political appointees could block funding for routine, essential costs like professional development, conference attendance, and organizational memberships.	our staff could be cut off from the training and professional networks that keep them effective, and our students would feel the difference.
that applicants would get extra points for accepting a lower indirect cost rate than they negotiated	smaller colleges and community organizations like ours could lose out, even with stronger proposals
vague new rules that could conflict with how Congress told TRIO to choose its students	confusion about whether we can keep serving the low-income and first-generation students TRIO exists for

Email template

Note: *Send this after your call, or on its own if you can't get through. The bracketed parts are where your program comes through, so give them the most time. Attach both handouts.*

TEMPLATE

Subject: How ED and OMB's proposed grant rules would affect [TOWN] TRIO students, and an invite to the Nov. 18 briefing

Hi [STAFFER FIRST NAME],

I'm [NAME], and I'm [YOUR ROLE, e.g., the director, a counselor, or an academic advisor] with the [TRIO PROGRAM] at [INSTITUTION OR ORGANIZATION] here in [TOWN]. I'm writing as a constituent about proposed changes to federal grant rules that worry me, and that would affect the students I work with.

This year we're working with [NUMBER] students from [SCHOOLS OR COMMUNITIES]. Most will be the first in their families to go to college. [ONE SPECIFIC DETAIL: a result, or a student's story without names. For example: "Last spring, every one of our seniors applied to college, and 31 of them started classes this fall."]

The Department of Education and the Office of Management and Budget have both proposed new rules for how federal grants are awarded and managed. I'm all for accountability with taxpayer dollars, but these proposals go much further and would very likely hurt the programs I work with as well as the students we serve. Specifically, the Department of Education could end a grant "for convenience" even when a program is doing everything right, or cut its funding for reasons that have nothing to do with how it's performing. The rules would also require political sign-off on grant awards and add a lot of new paperwork.

My biggest worry is [PICK ONE FROM "YOUR BIGGEST WORRY" ABOVE]. For our students, that would mean [ITS IMPACT, IN YOUR OWN WORDS OR WITH A REAL EXAMPLE].

As Congress finishes FY 2027 funding, I hope [SENATOR/REPRESENTATIVE] will support language that:

- extends the current block on OMB through FY 2027 and makes clear that this block covers the Department of Education's EDGAR rule too
- requires both agencies to measure the cost and burden on grantees, including small and rural ones, before going further
- requires them to consult with educators on development of future rules

I'd also love for you to join a lunch briefing on this topic on Wednesday, November 18, from 11:30 to 1:00 in the Capitol Visitor Center, Room 203-02. You can RSVP by Monday, November 16, at this link. I've attached the invitation and a short analysis of the proposals.

If you'd ever like to see our program in action, or have questions about TRIO in [STATE/DISTRICT], I'm always glad to help.

Thank you,

[NAME] [TITLE, INSTITUTION] [PHONE / PERSONAL EMAIL]

Call script

Note: *Don't read this word for word. Use it as a guide and keep the call to two or three minutes. Call the office's main line and ask for the staffer who handles education. If you get voicemail, leave a short version and follow up by email.*

Finding the DC office number: Call the Washington, DC office, not a state office. Each member's DC phone number is listed in the House directory and the Senate directory, and on the contact page of the member's website. You can also call the U.S. Capitol switchboard at (202) 224-3121 and ask to be connected to the office.

SCRIPT

Hi, my name is [NAME]. I'm a constituent from [TOWN], and I'm [YOUR ROLE, e.g., the director, a counselor, or an academic advisor] with the [TRIO PROGRAM] at [INSTITUTION OR ORGANIZATION]. Do you have a couple of minutes?

I'm calling about new grant rules the Education Department and OMB have proposed. They'd affect every TRIO program, including ours.

A little about us: we work with [NUMBER] students from [SCHOOLS OR COMMUNITIES], most of them first-generation and low-income. [ONE DETAIL OR RESULT.]

My biggest worry is [PICK ONE FROM "YOUR BIGGEST WORRY" ABOVE]. For our students, that would mean [ITS IMPACT, IN YOUR OWN WORDS OR WITH A REAL EXAMPLE].

We're asking [SENATOR/REPRESENTATIVE] to support language in the FY 2027 funding bill that blocks these rules, the way the current CR already blocks the OMB rule. I'll send you the details by email.

[Pause here and let them respond. You might ask: "Is this on [SENATOR/REPRESENTATIVE]'s radar?" If they ask something you can't answer, say you'll find out and follow up.]

One more thing: there's a lunch briefing for staff on this on Wednesday, November 18, in the Capitol Visitor Center. I'd love for you to come, and I'll put the invitation in my email.

Thanks so much for your time. What's the best email to send that to?

After you reach out

- **Follow up.** Staff are busy. If you don't hear back in a few days, send a short note and remind them of the November 16 RSVP deadline.
- **Say thank you.** Send a thank-you to every staffer you speak with, even if they don't commit.
- **Bring in your network.** TRIO alumni, parents, and partners can email their members in two minutes through the coalition's action center.
- **Tell COE what you heard.** Send Peter Mills (peter.mills@coenet.org) which offices you reached, any response, and whether a staffer plans to attend the briefing. This helps us target follow-up meetings.