



National School Boards Association
1680 Duke St. FL2, Alexandria, VA 22314-3493
Phone: (703) 838.6722 • Fax: (571) 470.5108
www.nsba.org

Office of Management and Budget
Office of Federal Financial Management
Washington, D.C.

Re: Comments on Notice of Proposed Rulemaking — Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (2 C.F.R. Part 200)

Dear Director Russell Vought,

On behalf of the National School Boards Association (NSBA), we appreciate the opportunity to submit comments on the Office of Management and Budget's (OMB) Notice of Proposed Rulemaking (NPRM) to revise the Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (Uniform Guidance), as published in the Federal Register on May 29, 2026.

NSBA represents state school boards associations and the locally elected school boards that govern public school districts serving more than 50 million students nationwide. Local school boards are responsible for the effective and accountable use of federal education funds, and we share OMB's commitment to ensuring transparency, fiscal responsibility, and strong program outcomes. At the same time, we are concerned that several provisions in the proposed rule — most notably the revisions to §200.432 (Conference Costs) — would introduce unnecessary administrative constraints and reduce the ability of local educational agencies (LEAs) and other grantees to use federal funds effectively to improve student outcomes.

The NPRM proposes revising §200.432 to provide that conference attendance costs are allowable only when participation is expressly approved by the awarding federal agency and specifically included in the terms and conditions of the federal award. NSBA is concerned that this approach would significantly limit the ability of school districts and education leaders to access high-quality professional development and training opportunities that are directly tied to federal program implementation. Historically, the Uniform Guidance has recognized that professional learning, convenings, and collaborative activities are legitimate and necessary expenditures when they contribute to achieving program objectives. The proposed change departs from this longstanding framework by imposing a rigid pre-approval requirement that may not reflect the dynamic needs of schools and districts.

School board members, superintendents, and district staff rely on conferences, trainings, and convenings to: (1) strengthen governance and oversight of federally funded programs, (2) share evidence-based practices and innovations across districts, (3) build local capacity to meet federal requirements and program goals, and (4) respond to emerging challenges and priorities in real time. Limiting access to these opportunities would reduce the effectiveness of federal

investments and undermine efforts to improve educational outcomes at the local level. The ability to engage in ongoing professional development is particularly important for locally elected school board members, who must oversee increasingly complex federal programs while ensuring compliance with statutory and regulatory requirements.

The proposed requirement that conference participation be explicitly included in award terms would create additional administrative burdens for both grantees and federal agencies. Federal awards are often structured in a manner that does not anticipate every specific training or convening opportunity at the time of award issuance. As a result, LEAs may be required to seek amendments or additional approvals throughout the grant period, delaying access to time-sensitive learning opportunities and increasing administrative costs.

This approach is inconsistent with efforts to streamline federal grant administration and reduce unnecessary regulatory burdens on state and local entities. The proposed restrictions are likely to have a disproportionate impact on smaller and under-resourced school districts, which rely more heavily on federal funding to support participation in professional development and training opportunities. Without access to federal funds for these purposes, many districts may be unable to participate in convenings essential to building capacity, improving governance, and implementing federal programs effectively.

The proposed changes may also have broader implications for national and regional education convenings, including those hosted by organizations such as NSBA. School board members and district leaders frequently use federal funds, where permissible, to attend conferences focused on governance, federal policy, and program implementation. These convenings provide essential opportunities for peer learning, collaboration, and dissemination of best practices. A significant reduction in participation could weaken these networks and limit the field's ability to scale effective strategies nationwide.

NSBA strongly urges OMB to carefully consider the unintended consequences of the proposed changes to §200.432 and to ensure that the final rule preserves the flexibility necessary for LEAs and other grantees to implement federal programs effectively. Professional development, collaboration, and convenings are not ancillary activities; they are essential components of successful program implementation and improved student outcomes. We look forward to continued engagement on this important issue and stand ready to work with OMB to ensure that the final rule appropriately balances accountability with flexibility.

Sincerely,

A handwritten signature in black ink, appearing to read "Verjeana McCotter-Jacobs". The signature is fluid and cursive, with the first name "Verjeana" written in a larger, more prominent script than the last name.

Verjeana McCotter-Jacobs
Executive Director & CEO
National School Boards Association (NSBA)