

FEDERAL CALL TO ACTION

DEFEND THE SPEND & E-Rate – ACTION NEEDED BY NOV. 1

October 6, 2026

QUICK REMINDER: E-RATE (COMMENTS DUE OCTOBER 13)

The FCC's E-Rate review (WC Docket 26-133) closes for comments Oct. 13. The record includes whether the program should continue at all. Comments from superintendents naming their own bandwidth costs and student counts make the strongest case. AASA's tool at [Protect E-Rate](#) — What's at Stake for America's Schools & Libraries makes filing quick.

Defend the Spend Recommendations from DOGE:

On Sept. 28, the U.S. DoE issued a memo titled "Mandatory Written Justifications for Payment Requests to Implement Executive Order 14222." Beginning Nov. 1, grantees will need to submit a written justification for each drawdown of federal grant funds. See K-12 Dive coverage of the issue published Oct. 1 here: <https://www.k12dive.com/news/education-department-wants-grantees-to-defend-the-spend-DOGE/831743/>

The Committee for Education Funding (CEF), on Sept. 30, explained that the requirement applies to all ED grants and across the entire ED grantee pool. Drawdown justifications have traditionally been reserved for grantees with financial or compliance concerns. DoE is telling recipients to "plan accordingly and allow sufficient time for processing." That means added paperwork and the potential for payment delays for every school district.

The EdDive Article explains AASA's concern about delays in moving federal resources to schools, districts and states. "Because federal education funds are drawn down through state agencies, the new justification requirements would create additional administrative work for both states and school districts," said Sasha Pudelski, director of advocacy for AASA, The School Superintendents Association, in an online post Tuesday.

Pudelski said the new process would require states to develop guidance, provide technical assistance and to review submissions, while districts may be required to give detailed explanations for pre-approved expenditures. The written justifications seem duplicative of existing accountability measures, which include extensive oversight like "detailed application and budget approvals, monitoring requirements, audits and fiscal reviews," Pudelski said.

"Adding another layer of pre-approval paperwork increases administrative burden without meaningfully improving accountability, redirecting limited administrative capacity away from teaching, learning, and student services," Pudelski said.

Advocacy Actions: Contact Iowa's U.S. Senators and Congressional Representatives before Nov. 1. Ask them to contact DoE and ask them to resist the additional bureaucratic step of having to justify every

federal fund drawdown. The expenditure of federal funds is highly regulated, with oversight before the request via an application process and down to the dollar after the expenditures are reported. Requiring the additional paperwork in an application to justify the request is burdensome for school districts. A local leader's story of limited capacity carries real weight. ED's guidance on submitting payment justifications is here: [DTS Payment Justification – Grantee User Interface](#)

Find your district's Congressional Representative and Senators Grassley and Ernst on the Iowa Legislative Website Lookup Tool at: <https://www.legis.iowa.gov/legislators/find> Select the "school district" tab. Select your school district name from the dropdown box. Page down to select "other elected officials" for links to federal Legislators' contact.

Please let us know if you receive any commitments of support or additional questions from your advocacy efforts. Thank you for your advocacy on behalf of the students and families in your school district!