

MEMORANDUM

DATE: September 28, 2026

TO: All U.S. Department of Education Grant Recipients

FROM: Murray Bessette
Principal Deputy Assistant Secretary and Acting Assistant Secretary for the
Office of Planning, Evaluation and Policy Development

SUBJECT: Mandatory Written Justifications for Payment Requests to Implement Executive Order 14222

Purpose

This Memorandum provides guidance regarding the requirements for submitting written justifications for payment requests when accessing federal grant funds. This guidance is issued in furtherance of [Executive Order \(EO\) 14222](#), dated February 26, 2025, “Implementing the President’s ‘Department of Government Efficiency’ Cost Efficiency Initiative” (hereafter referred to as “DTS,” short for *Defend the Spend*) which aims to ensure transparency and accountability in federal spending. It includes a framework to assist recipients in preparing accurate and compliant written justifications for payment requests.

Background

The President’s DTS initiative, outlined in EO 14222, emphasizes transforming federal spending to ensure transparency and accountability to the American public. A key component of this initiative requires federal agencies to establish systems for recording and justifying payments issued under federal contracts and grants.

Starting on **November 1, 2026**, written justifications for payment requests will be required for all Department of Education (ED) grants. This will bring ED’s grants, administered via our grant system, G5, in line with the process already in place with the grants co-administered with our agency partners through interagency agreements. For those grants co-administered by partner agencies, DTS implementation is already complete, and written justifications for payment requests have been required since the grants were first administered through the partner agencies’ systems.

Beginning November 1, 2026, the G5 system will update and require recipients to provide a written justification for all payment requests. This process should not change the timeline for processing a payment request, unless the payment request triggers procedural or internal control concerns (see “Clarification on Justifications for Payment Requests” for more information). The following guidance applies to justifications for payment requests submitted through all grant payment systems for all ED programs.

Regardless of the system in which the grant is administered, recipients should plan accordingly and allow sufficient time for processing, in the instance where additional review or clarification may be required.

Guidance on Justifications for Payment Requests

Recipients must provide clear, detailed justifications for each payment request. Every justification for a payment request must include all of the following elements, and be no longer than 255 characters:

☐ **Program Name**

Identify the program associated with the request (e.g., Perkins V; ESEA Title I, Part A; IDEA Part B, Sec. 611; or Innovative Approaches to Literacy).

☐ **Expense Categories & Amounts**

List the relevant budget line items or expense categories with amounts that total the payment request. ED encourages recipients to use the budget categories used in the budget form submitted with your grant application, if applicable: personnel/fringe benefits, travel, equipment, supplies, contractual, construction, other, and indirect. If applicable, recipients may also use the “subaward(s)” expense category.

☐ **Date Range**

Provide the start and end dates for the date of the earliest expense included in the payment request and the date of the latest expense included in the payment request.

☐ **No Personally Identifiable Information (PII)**

Do not include names, employee IDs, social security numbers, or any other PII.

Justifications for payment requests should be complete and brief. Use precise wording that conveys the required program, costs, and dates without additional narrative. The goal is clarity and compliance within a 255-character limit.

Suggested Sentence Frame

“[Grant Program Name]: [Line item] \$, [Line item] \$, [Line item] \$; Dates [start]–[end].”

Note: Justifications must accurately justify costs directly incurred by the recipient. Subawards, if applicable, may be categorized by the level of detail the recipient has available, but each request should clearly indicate the total amount per request expended via subawards.

Final Submission Checklist

Before submitting a payment request, verify that:

- ☐ The program name is identified
- ☐ All line items are listed with precise amounts

- ☐ The expenditures sum to the payment request total
- ☐ A valid date range is included
- ☐ No PII is included

Clarifications on Justification for Payment Requests

Payment requests that trigger procedural or internal control concerns will be handled in accordance with current policies and procedures, which are described below.

In the event a recipient submits an invalid or incomplete written justification for payment request and a clarification is required, recipients will receive an email that specifies any additional information that may be needed. Once the recipient responds to the clarification request via an updated justification for payment request, the payment request will be processed. Recipients should respond to requests for clarification about payment request justifications as soon as possible and ensure that all the elements in the clarification request are addressed in the updated payment request justification. The payment request will not be approved until the clarification request is responded to and accepted.

If any issues arise regarding payment processing, recipients should contact their assigned ED contact (including program specific inboxes, if applicable).

In certain circumstances, it may be necessary to reject a recipient's justification for payment request outright (e.g., when a recipient submits a duplicate payment request or a request for unallowable costs). When a justification for payment request is rejected, the recipient will receive an email notification of the payment request rejection.

Support and Resources

If you would like template language or examples to assist in preparing your justification for payment requests, please contact your assigned ED contact.

Grants Administered out of G5

Please contact the Office of Business Support Services at OBSSHelpDesk@ed.gov and copy your assigned ED contact. An online ticket can also be submitted at: <https://obssed.servicenowservices.com/csm>.

Please see this PowerPoint for step-by-step instructions on how to submit justifications in G5: [G5 Payment Justification](#).

Grants administered out of PMS (Payment Management System)

Please contact PMS Support at PMSSupport@psc.hhs.gov and copy your assigned ED contact. An online ticket can also be submitted at: https://gditshared.servicenowservices.com/hhs_pms.

Note: Recipients are encouraged to mark emails from PMS Support as “Not Spam” and add the sender to their safe senders list to help ensure future PMS communications are delivered to their inbox.

Please see this PowerPoint for step-by-step instructions on how to submit justifications in PMS:
[PMS Payment Justification](#).