

knowledge alliance

May 12, 2022

Mark Schneider
Director of the Institute of Education Sciences (IES)
550 12th Street SW
Washington, DC 20024

Dear Director Schneider,

I am writing on behalf of Knowledge Alliance (KA) with comments and recommendations in response to the three Institute of Education Sciences (IES) related National Academies of Sciences, Engineering and Medicine (NAEM) reports released in the months of March and April, specifically “*A Pragmatic Future for NAEP: Containing Costs and Updating Technologies*,” “*The Future of Education Research at IES*” and “*A Vision and Roadmap for Education Statistics*.” KA, a non-profit, non-partisan organization, is composed of leading education organizations that share the belief that high-quality, relevant research is critical to solving the education problems facing our country today. Collectively, we work to elevate the creation and use of rigorous research and evidence for systems change, sustainable reforms, equitable public education and access to opportunity for all. KA thanks IES for recognizing the value of consistent evaluation and commissioning NAEM to conduct a review of the National Assessment of Educational Progress (NAEP), the National Center for Education Research (NCER), the National Center for Special Education Research (NCSER) and the National Center for Education Statistics (NCES). Additionally, KA appreciates the NAEM panelists and authors for their time, attention to detail and commitment to evaluating IES in an unbiased fashion.

KA members engage with IES in a multitude of ways: as grant recipients, data users, data disseminators, and through the What Works Clearinghouse (WWC), among other areas. We are therefore uniquely invested in the results and recommendations in the NAEM reports. KA identified four common themes between the three reports, which we provide responses to. We then provide brief responses specific to each report in order of release. We thank IES for considering KA’s responses, feedback and suggestions and reiterate our willingness to provide guidance in the implementation of these recommendations as needed.

Thematic Point #1: IES is currently underfunded and overburdened.

Since its inception 20 years ago, IES has been responsible for defining the education research landscape by developing and disseminating research nationwide. IES has successfully accomplished this despite a lack of steady increases in Federal funding and in increase in multiple unfunded mandates. As highlighted in “*A Vision and Roadmap for Education Statistics*” NCES has faced multiple new, unfunded mandates such as the Geospatial Data Act and an expansion in mission under the Foundations for Evidence-Based Policymaking Act of 2018. The challenges IES faces in fulfilling its mission are further exacerbated by the fact that it does “not appear to be on par with that of other scientific funding agencies,” as highlighted in Recommendation 9.2 of the “*Future of Education Research at IES*.” Despite IES’s critical work supporting the U.S. Department of Education (ED) and ensuring the availability of high-quality education research, it currently receives significantly less funding than similar agencies such as the National Institutes of Health (NIH) and the National Science Foundation (NSF). This chronic



underfunding has not only led to lost opportunities but slowed down the pace by which IES can evaluate grant and contract competitions, disseminate effective research and respond to needs of the field. We agree with the NASEM reports' overall sentiment that improvements to IES must be supported through appropriation increases.

Thematic Point #2: IES must continue its investments in equitable education research.

Knowledge Alliance strongly believes that every student should have equitable access to high quality teaching and learning to succeed in life. Moreover, our members work closely with IES to create and disseminate education research that can address inequities in education. While we know that IES projects have been addressing educational inequities for years, we appreciate the explicit request for equitable investments stated in the NASEM reports and agree that equity should be clearly guiding the work of IES, including within NAEP, NCER and NCES.

Thematic Point #3: IES's departments must operate together rather than in silos; KA suggests that IES expand Recommendation 2.1 in "A Vision and Roadmap for Education Statistics" and create a strategic plan that cuts across IES Centers.

In reviewing the three NASEM reports, KA members consistently noted how the work of various IES Centers intersect. While we understand why IES requested three separate NASEM reports, we urge the agency to consider the recommendations collectively as well as consider Centers or programs not explicitly discussed in the reports. With this in mind, we believe that IES should invest in a strategic plan that cuts across centers and considers how they can best work together.

Throughout the various reports, KA members noted how the Regional Educational Laboratories (RELs) program may help facilitate recommendations, particularly with regard to knowledge mobilization. For example, recommendation 2.5 in "A Vision and Roadmap for Education Statistics," highlighted the need for NCES to explore alternative data sources and develop new data-science methods. KA members strongly believe that RELs could serve an important role in helping States and districts understand the value and potential of investments in such infrastructure. As IES considers the implementation of NASEM's recommendations, or any additional improvements to the agency, we ask that they consider the work of IES holistically.

Thematic Point #4: The National Board of Education Sciences (NBES) must be populated as soon as possible.

The NASEM report "The Future of Education Research at IES" notes that one of the two primary directive entities of IES, NBES, has not convened since 2016 due to a lack of quorum of appointed members. Per the Education Sciences Reform Act (ESRA), the responsibilities of NBES include:

1. Advising and consulting with the IES Director on the policies of IES;
2. Considering and approving priorities proposed by the Director to guide the work of IES;
3. Reviewing and approving procedures for technical and scientific peer review of the activities of IES; and

4. Advising and providing recommendations to the IES Director in a number of areas related to enhancing the scope and impact of IES-funded activities and enhancing the overall effectiveness of IES.

Given that ESRA outlines that the Director and NBES share the responsibility for setting IES's agenda and research priorities, KA strongly believes that it should be populated prior to making any of NASEM's recommendations. The NBES will provide critical insight from the field and ensure that additional perspectives are accounted for in guiding IES's advancement.

We have provided brief comments below highlighting our responses to key portions of all three NASEM reports in order of their release. We reiterate that any changes enacted by IES must occur with respect to current staff capacity and agency funds.

Comments on "A Pragmatic Future for NAEP: Containing Costs and Updating Technologies"

NAEP has been measuring student achievement across various grade levels and subject areas since 1969. As one of the most visible IES products, NAEP results consistently enter the national news cycle, providing great visibility to current education achievements and shortfalls. While the NASEM report makes valid points in support of streamlining the costs of NAEP, KA members strongly believe that any reductions in cost should not impact the quality of the test. While the panel expressed concern that the "[p]rogram management, planning, support and oversight costs account for more than 28.7 percent of NAEP's budget, which is large both in absolute terms and as a percentage of NAEP's budget," it is important to recognize that this budget item includes costs for many items that go beyond "planning and management" such as survey questionnaire development, trend and fairness reviews, translation activities, data collection, analysis, reporting and other activities. Additionally, KA is concerned that reductions in the Federal cost of NAEP may shift costs and/or increase burdens to State Educational Agencies (SEAs) and Local Educational Agencies (LEAs) so we strongly urge IES to evaluate potential, unintended consequences of local administration.

KA members deeply appreciate the high-quality data produced by NAEP, particularly the results of long-term trend NAEP. We encourage IES to modernize and continue long-term trend NAEP as it brings unique, long-term perspectives to student achievement and would be a great loss to the field if eliminated. Additionally, KA members ask IES to recognize that NAEP is already taking steps to evolve in many of the areas highlighted in the report. Rather than remaining stagnant, NAEP has been investing in automated scoring, eNAEP and streamlining costs, when possible. While KA members appreciate the report for flagging areas for continued improvement, we believe it is important to recognize these existing efforts as IES looks forward.

Comments on "The Future of Education Research at IES"

KA members regularly work on projects funded by NCER and NCSER, the Centers reviewed in this NASEM report. As an organization whose member's work spans the building and use of effective, evidence-based practices, dissemination, evaluation and innovation, KA welcomes the concept of "knowledge mobilization" proposed in the report. KA members appreciate the report's recognition that "understanding the processes around knowledge mobilization would help better develop mechanisms

for determining what research would be useful for education policy makers and practitioners, as well as identifying strategies for supporting them in using that research when it is available.” In addressing this recommendation, KA encourages IES to consider how the RELs currently support the work of disseminating promising evidence into decisionmaker’s hands as well as how the RELs help educational leaders harness that evidence into action. KA members have witnessed firsthand how RELs support educational leaders to use research more centrally and substantively in their decision making.

KA appreciates recommendation 4.1's finding that “under the existing project type structure, and given IES’s emphasis on designs that allow for causal inferences, topic areas that can be studied with randomized interventions are viewed as more competitive by reviewers.” Therefore, KA generally supports the recommended revised categories of research so that topic areas that are more challenging to study are provided funding.

KA also appreciates the note in recommendation 4.1 that the current NCER and NCSER project types and topics structure “fail to account for the complexities of implementation or how evidence influences or drives changes in policy and practice.” KA members encourage IES to consider how the National Center for Education Evaluation and Regional Assistance (NCEE) as well as the former Researcher-Practitioner Partnerships (RPPs) can be used to support the implementation of recommendation 4.1.

KA members are also in support of recommendation 5.1 to look at outcomes other than solely individual student outcomes because we concur with the report authors that this expansion of outcome measures could be important in driving research that examines systems or school buildings. KA supports recommendation 6.1 to develop competitive priorities for other research methods as well as recommendation 6.2 to convene a new competition and review panel for qualitative and mixed-methods and approaches. KA is particularly invested in how these measures will relate to the WWC and the Elementary and Secondary Education Act (ESEA) tiers of evidence.

KA strongly supports recommendation 7.3 to increase transparency around who applies for, and benefits from, training. KA also strongly supports recommendation 8.1 that IES regularly collect and publish information on the racial, ethnic, gender, disciplinary and institutional backgrounds of applicants and funded principal investigators (PIs) and co-PIs, as well as the composition of the review panels and study samples. In addition, KA would encourage increased transparency around the review process.

As IES considers expanding NCER and NCSER in other ways, such as working with big data, expanding to studies on data visualization and education technologies or holding two grant cycles, KA emphasizes the need to balance new initiatives under current funding allocations. Regarding recommendation 8.2 for two grant cycles, KA would be happy to provide field input on how to best transition to this practice in terms of timing, expected turnaround and size of the grants.

Comments on “A Vision and Roadmap for Education Statistics”

KA members are energized by this report’s vision to fundamentally reimagine NCES by developing a strategic plan based off many of the report’s recommendations. Similar to the other two NASEM reports, KA encourages that many of the largescale recommendations be implemented following the full population of the NBES and as a result of increased Federal resources.

knowledge alliance

KA supports the attention to NCES' role as a leader in evidence building and NCES' strong history of producing credible and relevant evidence, being a leader in data standards and a key facilitator in data access. While KA members believe NCES should play a leadership role in fulfilling the roles of the statistical official delineated in the Evidence Act as outlined in recommendation 2.3, we believe this transition should account for NCES' capacity at current appropriations levels and occur in partnership with ED.

KA supports the report's recommendation to expand data sources for new insights. However, in order for NCES to take advantage of additional data sources and new ways to link data, and to collaborate with other Federal, State and local agencies, additional resources will be required.

KA strongly supports the report's recommendation to assist SEAs and LEAs through data facilitation. KA members are already engaging in work to help states, districts and schools build their data capacity and streamline data linkage. KA notes that NCES can play a stronger role in data governance, particularly as a data facilitator, data curator and template developer. Again, to do this, additional resources beyond current Federal appropriations will be needed.

With regard to conclusion 4-1 noting that NCES "can expand its impact by providing leadership and expertise to facilitate responsible data use and access," KA finds that RELs and the Comprehensive Centers (CCs) can support and provide capacity building in this area. KA members also appreciate the report's conclusion to reconsider NCES' organizational structure, but do not support the third recommendation to separate NAEP from NCES.

Lastly, KA would like to lift up the report's recognition of the NCES School Pulse Panel (as well as the role NCES played in the Household Pulse Panel, which was not mentioned in the report) as examples of innovation and flexibility NCES is capable of. However, the report failed to note how this innovation and flexibility was possible only because of COVID-19 relief funding. KA notes that without increased Federal appropriations, none of the recommendations in the report can be successfully undertaken.

Conclusion

KA members look forward to acting as a thought partner with IES as it considers implementing the recommendations proposed by NASEM. Furthermore, we are excited to engage with IES on conversations surrounding improvements to current data infrastructure. As we have done for the past fifty years, we intend to continue advocating for IES's need for increased Federal appropriations and hope that such increases can allow for IES's advancement as boldly envisioned in these three NASEM reports.

Please reach out to Rachel Dinkes at rdinkes@knowledgeall.net, Lindsay Fryer at lfryer@pennhillgroup.com or Soraya Zrikem at szrikem@pennhillgroup.com with any questions,

Best,



Rachel Dinkes, President