



June 1, 2021

Ruth Ryder
Deputy Assistant Secretary
Office of Elementary and Secondary Education
U.S. Department of Education
400 Maryland Avenue, SW, Room 3E325
Washington, DC 20202

RE: Docket ID ED-2021-OESE-0044

On behalf of Knowledge Alliance (KA), the following comments are provided in response to the Notice of Proposed Requirements and Definitions for the Education Innovation and Research (EIR) program published in the Federal Register on May 3, 2021. Knowledge Alliance, a non-profit, non-partisan organization, is comprised of leading education organizations committed since 1971 to the greater use of high-quality and relevant data, research, evaluation and innovation in education policy and practice at all levels. Knowledge Alliance supports the development and scale-up of successful innovations at the State and local levels that help drive substantial and lasting improvements in student achievement. We support education programs, like EIR, focused on building and disseminating evidence to improve teaching and learning in our nation's classrooms. Knowledge Alliance is pleased that Congress continues to provide robust funding and support for EIR and that the U.S. Department of Education (ED) is focused on ensuring evidence-based strategies and interventions are used to support student learning and development.

As a whole, Knowledge Alliance supports the priorities and definitions recently proposed by ED. We additionally ask that ED ensure the congressionally directed mandate for explicit funds towards social and emotional learning (SEL) and Science, Technology, Engineering and Math (STEM) in making EIR awards is met. While we are pleased to note that references to SEL, STEM and computer science (CS) are included in each of the two proposed priorities, we want to ensure that EIR overall continues to build upon these specific areas of proven success.

Furthermore, we appreciate that both proposed priorities recognize the importance of professional development within EIR projects to build capacity amongst leaders and educators to achieve the project's intended outcomes. We request that any professional development related projects funded under EIR be aligned with the definition of "professional development" in Section 8101 of the Elementary and Secondary Education Act (ESEA) and necessary data be collected and evaluated to measure the impact of professional development on teacher and student learning.

Proposed Priority One: Innovative Approaches to Addressing the Impact of COVID-19 on Underserved Students and Educators.

The need to focus on what works for students, educators and school leaders using research and evidence-based practices has always been critical, but now more than ever it is imperative as our nation's education system seeks to recover and meet the profound learning and social and emotional needs of students—especially those who have been disproportionately impacted by the COVID-19 pandemic. Knowledge Alliance is appreciative of the diverse ways in which priority one maintains the importance of SEL with the inclusion of multi-tier systems of support, educator professional development, resources to use trauma-informed practices and support for the creation of equitable and inclusive learning environments in schools. KA supports priority one's recognition of the importance of addressing and progressing past the many educational challenges posed by the COVID-19 pandemic through evidence-based practices that consider the whole child and needs of educators.

Proposed Priority Two: Promoting Equity and Adequacy in Student Access to Educational Resources and Opportunities.

Knowledge Alliance strongly supports ED's interest in projects that propose innovative ways to address the various inequities in this country's education system. Equity is critical to a flourishing education system and research is key to identifying and supporting equitable evidenced-based practices across the nation. The projects supported by EIR, under this proposed priority, can help guide the nation's learning recovery and address systemic practices that have contributed to inequities, so that we can exit the pandemic with a stronger, more equitable, educational system than we entered with.

Proposed Definition for High-Quality Tutoring

Knowledge Alliance recognizes the importance of high-quality tutoring that is evidence-based, delivered in small-group settings and reflects differentiated support based on student need. To reinforce that high-quality tutoring is rigorous and effective, KA proposes the following edits in bold to the proposed definition:

High-quality tutoring means tutoring that is based on evidence-based strategies, **as defined in section 8101 of ESEA and is appropriate to the phase of EIR to which the applicant is applying to**, that support students' success in the classroom; is delivered in individualized or small-group settings; reflects differentiated support based on student need; is aligned with the district's curriculum; has established standards of intensity and dosage based on level of need; is delivered by tutors who are well-trained, who are supported with resources and personnel (such as a tutor coordinator), and who work closely with the student's teacher of record; and includes instruments to examine instructional quality and quantity.

This addition will align ED's efforts towards building and applying an evidence-base in high-quality tutoring with the current definition of "evidence-based" in ESEA and ensure that strategies related to high-quality tutoring are supported through research and evidence.

Proposed Definition for Personalized Learning

Knowledge Alliance supports the proposed definition for personalized learning; we are appreciative of ED's recognition that various data sources, like formative assessments and digital learning, are key components in tailoring the instructional needs of individual students.

Proposed Definition for Underserved Students

Knowledge Alliance supports the proposed definition of underserved students. The proposed definition provides greater clarity on the high-needs student populations that have been disproportionately impacted by the COVID-19 pandemic. We believe that by focusing efforts on the needs of underserved students, EIR grantees will be able to directly address the impacts of COVID-19 and strengthen the educational system for all students.

As a coalition of leading education organizations, Knowledge Alliance believes education innovation is imperative to providing solutions that address the direct educational challenges of the COVID-19 pandemic and systemic inequities within our educational system. Knowledge Alliance strongly believes that the EIR program is critical in supporting new solutions to various challenges and helping states, districts, educators, families and communities prepare students for success in college, career and citizenship.

Thank you for the opportunity to comment on the proposed priorities and definitions. If you have questions, please do not hesitate to contact me at jball@knowledgeall.net.

Sincerely,

A handwritten signature in cursive script that reads "Jacki Ball".

President
Knowledge Alliance