



December 9, 2021

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) to provide insight and recommendations in response to the request for comment made in your blog post titled, "Better is Good" on September 15, 2021. 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 members regularly receive Institute of Education Sciences (IES) funding for their research and dissemination work, and many also operate Regional Educational Laboratories (RELs) and Comprehensive Centers (CCs) for IES and the U.S. Department of Education (ED), respectively.

Over the past few months, we have been closely following the National Academies of Sciences, Engineering and Medicine (NAS) panel on the future of education research at IES and are appreciative of the opportunity to comment on the topics you raised in your September blog post during this transformative time for the agency.

Involving SEAs/LEAs in IES-Sponsored Research

KA members understand the importance of strong partnerships with State educational agencies (SEAs) and local educational agencies (LEAs) to ensure that research is high-quality, relevant and actionable. Our members depend on and actively support robust collaborations with State, district and school staff to formulate relevant, high-priority research questions, to account for local context in study designs, to support strong implementation of interventions, to access data and to interpret and communicate research findings. These roles require SEA and LEA partners to be able to review data before publication to support accurate interpretation and appropriate communication.

Strengthening SEA/LEA Involvement in IES-Sponsored Research and Recommendations

In our members' experience, SEA and LEA staff welcome participation in IES-sponsored research when the research team offers an authentic partnership and when the research

demonstrates value by providing actionable insights—early and often—on questions of high priority to State and district partners. However, IES rules and timelines can often be an impediment to successful research as studies that require original data collection typically take years to complete after an IES grant-making cycle that takes the better part of a year. Additionally, KA members feel that many IES award cycles can be at odds with traditional school data collection times, which usually happen at the beginning of the school year. As most IES grants are received in winter, this leaves no choice but to collect data in the middle of the school year or wait until the next school year. Consequently, even the most relevant IES-sponsored research projects may be completed too slowly to provide answers to the questions SEAs and LEAs ask in the moment. When the potential benefits of research are unclear or too far removed, SEA and LEA staff rightly invest their limited time elsewhere.

States maintain increasingly comprehensive data warehouses that could be much more effectively leveraged to address pressing policy-relevant questions in a timely way. For example, [a study conducted by REL Appalachia](#) of the middle school math course sequence leading to Algebra I and graduation combined with [analytic technical support](#) helped one district change its course assignment policies, effectively eliminating tracking in its middle schools. The REL program's Just-in-Time studies offer additional opportunities to support States and districts and may be completed within 12 months. IES could work with REL staff to further streamline and accelerate the review process for these types of studies, which would make them more useful for States and districts, increasing demand for this kind of work.

Larger SEAs and LEAs have dedicated research and data staff, although many of these individuals are also responsible for State accountability monitoring, Federal reporting and response to urgent needs such as COVID-19 prevention and planning. SEAs and LEAs also often experience high staff turnover and may not be able to commit resources for multiyear projects. To address these capacity issues, we recommend two kinds of incentives that our members have found effective to increase SEA/LEA participation: (1) providing monetary support for SEA/LEA staff working on projects; and (2) establishing specific checkpoints between researchers and SEAs/LEAs throughout a project so they feel invested in the work, can see incremental progress and value and provide input. We recommend that IES directly support such practices, including through providing additional resources, to ultimately improve research effectiveness and impact.

To further strengthen SEA/LEA participation, we propose that IES consider reinstating [research-practitioner partnerships](#), which were a successful effort to include SEAs and LEAs in the development of grant proposals without overburdening their staff. This program required researchers to outline SEA/LEA needs and how the research project would serve them. Engaging practitioners throughout the research process helped to ensure the work addressed their needs, generated actionable findings and created usable resources and communications.

Once granted, IES funds could be used as a stipend for SEA/LEA partners, which would further encourage engagement and guarantee another form of reciprocity.

Lastly, to facilitate the development of new and diverse partnerships between researchers and SEAs/LEAs, KA proposes that IES create a matching directory of States, school districts and other entities and organizations that are seeking research partnerships so that connections can be more efficiently and equitably made. This directory would serve as a clearinghouse for those seeking to connect and could help expedite the proposal process. Alternatively, IES could sponsor a small number of virtual networking events in advance of each grant competition. At these “meet-ups,” research teams and SEA or LEA staff could discuss research needs, capabilities and ideas in line with the upcoming grant competition to see if there could be a good fit for a partnership. Research teams could post a short abstract of past work with SEAs and LEAs in certain areas, particularly those relevant to any upcoming competition as a starting point for conversation. This approach could minimize the burden districts may experience by signing up for a public directory that invites researchers to contact them while continuing to encourage research partnerships.

REL-NEI’s partnership with the Rhode Island Department of Education (RIDE) exemplifies the work required to effectively strengthen SEA/LEA participation. This partnership provided a good framework for a sustained, five-year relationship by which REL-NEI pursued multiple research and technical assistance collaborations that supported decisions related to college and career pathways from school to the workplace. The work included a study of the effects of accelerated college credit programs, as well as related technical assistance to improve work-based learning program quality and data systems, which are all relevant to problems of practice facing RIDE. This partnership also provided various State agencies the opportunity to share updates on their work with researchers, which they deemed useful.

Another example of successful SEA/LEA engagement can be seen through Education Innovation and Research (EIR) grants. Several KA members serve as third-party evaluators on EIR grants and have found that interim reporting on program implementation and the factors that support or impede strong implementation are as valuable to district partners as the final assessment of the intervention’s impact on students. For example, RMC Research Corporation’s Denver office conducts implementation studies of EIR grants and curriculum adoption designed to explain observed differences in outcomes and to provide formative feedback on intervention components that are and are not effective. IES should require recipients of their research grants to design robust implementation studies and provide participating educators with actionable formative feedback. Again, this will require IES to ensure that research teams have adequate funding to support these activities.

SEAs/LEAs as Principal Investigators (PIs) in IES-Sponsored Research

Your blog specifically asked for feedback on the efficacy of SEAs and LEAs serving as PIs in IES-sponsored research. As mentioned, many SEAs and LEAs are excited about forming partnerships with researchers, and some even have dedicated staff to support this effort. While we encourage qualified SEAs and LEAs to serve as PIs on grants and other research projects, we believe IES can identify and incentivize a variety of approaches to researchers partnering with SEAs and LEAs to conduct meaningful, actionable and impactful studies. For example, staff may serve as co-PIs, task leads and act as senior advisors, depending on the project and available resources, where they can provide valuable input and be directly engaged in leading the work. We further recommend IES not require SEA and LEA staff working on grants to receive funds directly, as this could inadvertently supplant existing State or Federal funds that support SEA/LEA staff salaries. Grant reviewers would need training on this issue to avoid inadvertently penalizing proposals that do not allocate significant funding to SEA or LEA staff named as co-PIs.

Although some districts have the capacity to serve as PIs and have teamed up with KA members to compete successfully in the EIR program (RMC's partnership with Miami-Dade County and Seminole County is one example), in other cases, SEA/LEA leads in smaller districts and States are unfamiliar with Federal grant systems and may lack capacity to prepare successful proposals for IES grants. One KA member experienced these difficulties firsthand when an SEA partner found it so difficult to lead proposal development as the PI that the proposal bid was not submitted on time. Smaller SEAs and LEAs are also often unable to support implementation of off-the-shelf programs because they do not fit their context. Additionally, research is typically more expensive in smaller districts because research teams must engage multiple small districts to meet their design's sample size requirements. REL Appalachia highlighted some of these challenges, primarily in rural areas, [in a recent webinar](#). Throughout, REL Appalachia outlined how research in small or rural districts oftentimes requires more resources and discussed potential solutions to rural-specific barriers. IES should acknowledge that research in smaller SEAs/LEAs is more resource-intensive and align grant funding levels appropriately.

In summary, KA members will continue to work in partnership with SEAs/LEAs to understand the short- and long-term benefits of the proposed research project and to ensure success of the project. Throughout a partnership, it is important to have a common understanding of the overall benefits of the research, which may include providing stipends and materials for schools in exchange for participation and promising to provide research participants with relevant data and analysis. Overall, research is most beneficial to SEAs and LEAs when it does not interrupt or add to SEA/LEA workload, and instead, consistently supports States/districts and answers the questions of practice they are facing.

Peer Review Panels

On Improving and Diversifying the Peer Review Process

KA appreciates IES' efforts to diversify the peer review pool by race, ethnicity and professional background. Specifically, we believe your proposal to recruit panel members from backgrounds other than American universities, including experts from industry and philanthropy and qualified representatives from LEAs and SEAs, is appropriate and can help better ensure that proposed studies are suitable for an array of educational settings and educators. You stated in your blog that "academics can be very traditional and are trained to be hypercritical;" we agree that academic reviewers are sometimes at risk of holding particular biases towards certain strands of education research. We strongly support the idea of including well-trained reviewers from other education-affiliated backgrounds. Overall, we believe that panel diversity in all forms, including professional background, could help ensure a better balanced and more equitable review process.

Some KA members propose that IES consider requiring a training or certification process for peer reviewers. This will allow for an open and inclusive conversation on the risk of bias and ensure that all panelists hold a shared understanding of the IES proposal review process. We believe looking internally at the [What Works Clearinghouse's \(WWC's\) certification program](#) would be a great foundation for IES' own training program. A streamlined training program would allow for the recruitment of high-quality reviewers from an array of relevant backgrounds and lead to a larger bench of peer reviewers that are ready to be called upon to review when needed. This could also be a sustainable way to encourage a wider range of peer review perspectives without diluting the quality of the peer review process. A training program for peer reviewers on how to effectively communicate criticism and thoughts on an IES proposal could be beneficial to ensuring the proposal panels, when consisting of members with diverse perspectives, can have open, honest and constructive dialogue around strengths and limitations of proposals. Ultimately, this training would promote constructive communication back to applicants in ways that facilitate reflection and improvement in future applications.

As IES begins considering changes to peer review panels, we would like to emphasize the importance of a timely and efficient review process. KA members have repeatedly found their research negatively affected by delays in award announcements and the overall waiting time after submitting applications for awards. We encourage IES to consider ways to expedite the review process. For example, the National Science Foundation (NSF) has currently eliminated synchronous panel reviews in their "mail only" Merit Review process. In these cases, reviewers are responsible for reviewing and assigning scores to assigned applications by a certain date, regardless of when other reviewers receive their assignments. This practice streamlines the review process overall by eliminating the scheduling challenges related to getting all reviewers

together at the same time. Notably, NSF officers are expected to collect and summarize the results of the review panel oftentimes with final say on who is and is not recommended for awards. This may be more power than IES officials currently have in the peer review process. We urge IES to consider whether it has any programs where the tradeoff between quickening the pace of review and providing IES staff with slightly more agency is worthwhile. Specifically, as IES considers the use of a lottery system in granting awards, we wonder whether a process similar to NSF's would streamline the initial review process, while understanding that IES would need to put additional resources towards peer review to accomplish this goal. We also propose that IES consider shortening grant applications when applicable and feasible to make the review process more efficient for both applicants and reviewers.

The Proposed Use of a Lottery System in Granting Awards

Overall, KA members support, under certain conditions, the use of a lottery system to award grants. We believe it is critical that any lottery system require that applications meet a threshold review score before becoming eligible for an award so that awards continue to be made to the highest-quality applicants. The lottery system should not eliminate the need for a review panel, and we would like to underscore the importance of that panel being diverse and unbiased. We believe that such a panel can be achieved through the certification process that we previously noted. We would also like to note that the National Institutes of Health (NIH) lottery panel cited in your blog was applied to a program with a surplus of high-caliber applications and limited funding. Specifically, NIH chose to use the lottery system for a program in which they were unable to fund all eligible and high-quality applications. We believe that the lottery system is best fit for an equivalent situation within IES, and that it will be important to communicate clearly with the field about this intention.

Scaling Up

On Scaling Up Interventions and Products that Work

As IES and ED consider strategies to support scaling efforts, we recommend IES examine current REL and CC activities in this area. Unlike academic researchers, REL and CC staff have a strong focus on implementation and scale up efforts and are eager to do more work in this space. Additionally, RELs are well suited to investigate outcomes for specific student populations to then replicate, to the extent relevant and feasible, impact studies across multiple States in their region.

KA members were intrigued by your idea of embedding entrepreneurs in research and development projects. However, one current regulation may distort incentives for IES grantees to adopt the methods of commercial developers (market analysis, user-fit testing) with an eye

toward scaling their interventions or products. An Obama administration regulation ([2 CFR 3474.20](#)) requires ED grantees or subgrantees to openly license the public rights of any grant deliverable that is created wholly or in part with ED funds. This regulation has been applicable to competitive grant awards announced after February 21, 2017. Although we recognize that the kinds of market analyses that commercial developers routinely conduct might also support scaling of openly licensed products, this requirement will likely be a source of confusion about their relevance to IES grantees, or worse, a disincentive for engaging seriously with them. We believe this regulation could impact grantees' scale-up and commercialization efforts and request that IES look into this matter.

Member Examples of Support for Scaling

The following examples highlight successful KA member efforts to support the scaling of interventions of various kinds. We are happy to share more details upon request.

- The Comprehensive Center Network website provides an array [of evidence-based resources](#) for SEAs/LEAs to use and replicate in their local contexts, including toolkits, blog posts and policy briefs. Further resources can be found on individual CC websites.
- RMC Research Corporation is using implementation science through the RC7 Comprehensive Center to help SEAs in Alabama, Mississippi and Florida strengthen the link between research and practice. For example, RC7 is currently supporting the implementation of Florida's Benchmarks for Excellent Student Thinking (B.E.S.T) Standards through an improvement science lens. RC7 has supported Florida's SEA from day one and has focused on ensuring that research-based instructional practices are being used to support the implementation of B.E.S.T Standards.
- SRI Education serves as an evaluator of four i3/EIR scale-up or expansion projects. SRI evaluators work with developers to define their interventions and develop internal reporting mechanisms that help to ensure consistency of program delivery across sites. They also collaborate with developers to specify adaptations to their interventions that will support scaling by making them less costly or feasible to implement in a wider range of contexts, and then test the effectiveness of those strategies for reaching scaling goals.

Thank you again for your call for comment; we look forward to reading the NAS panel report in the upcoming months. Should you wish to follow up on this information, please contact Lindsay Fryer at lfryer@pennhillgroup.com or Soraya Zrikem at szrikem@pennhillgroup.com

Sincerely,

knowledge alliance

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