

knowledge alliance

April 1, 2022

Liz Eisner

Associate Commissioner

National Center for Education Evaluation and Regional Assistance (NCEE)

Institute of Education Sciences (IES), U.S. Department of Education (ED)

550 12th St SW

Washington, DC 20224

Dear Associate Commissioner Eisner,

On behalf of Knowledge Alliance (KA), the following comments are provided in response to the request for feedback on the *What Works Clearinghouse (WWC) Procedures and Standards Handbook, Version 5.0 (handbook)*. 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. We believe the effective use of rigorous research and evidence is integral to innovating and improving learning and outcomes for every student. Collectively, we promote the use of rigorous research to figure out “what works,” and why, to improve student outcomes and then share those findings with policymakers, practitioners and the general public.

KA members routinely utilize and promote the WWC. Some members use the WWC handbook for their study design to help ensure it will meet WWC standards while other KA members use the WWC to identify, and then disseminate, high-quality education research to the field. KA members appreciate the routine updates of WWC standards and procedures to provide clarifications and create new standards when circumstances illuminate that such changes are required by the field.

Overall, KA is in support of the majority of the proposed changes to the WWC. Below are specific comments around the themes and topics discussed in the WWC’s [“Summary of Changes to Draft Version 5.0 WWC Procedures and Standards Handbook.”](#)

Changes to the Organization of the Handbook

Knowledge Alliance **supports** the merging of the standards and procedures handbook into a single document to improve the *Handbook’s* usability to education practitioners, WWC reviewers and others who rely on the WWC to assess the quality of education research. Additionally, Knowledge Alliance **supports** the organizational changes proposed in version 5.0 of the *Handbook*. The new “Overview” chapter, will provide a succinct summary of the WWC and improves the accessibility of the WWC to broader audiences.

Knowledge Alliance also **supports** the modifications to the *Handbook’s* organization to align with the flow of content within the study process and the expanded technical appendices.

Changes to Procedures and Standards

Topic Specific-Application

Knowledge Alliance **does not support** the proposed change to no longer allow for topic-specific application of the standards. While KA members understand the need for consistency in study reviews, we believe the flexibility of the current policy, which allows for topic-specific application of the standards, permits reviewers and researchers to better account for the nuances of education research in different domains. When instances of rater inconsistencies arise due to topic-specific application of the standards, KA suggests that it be noted to enable the reader to decide the impact.

Use of Study Review Protocol

Knowledge Alliance **supports** the proposal to use the *Study Review Protocol* to compliment the *Handbook*.

Effectiveness

Knowledge Alliance **supports** the alignment of WWC effectiveness ratings with the definition of “evidence-based” included in the Elementary and Secondary Education Act (ESEA) and utilized by the Institute of Education Sciences (IES) and the U.S. Department of Education (ED). This proposed change will streamline identification of effective interventions. Additionally, Knowledge Alliance **supports** the proposed change to determine effectiveness ratings at the domain level and create a composite finding if there are multiple main findings. This will provide a better representation of the underlying construct than a single measurement and eliminates the need for multiple comparison corrections.

Knowledge Alliance **does not support** the proposed change to only allow WWC effectiveness ratings to be based on outcome measures that are independent of intervention developers and study authors due to there being many examples of developer outcome measures that have been independently validated to meet standards of reliability and validity. There are strong examples of developer outcome measures that use a criterion-referenced approach constructed independently of a product. KA appreciates the WWC’s emphasis on integrity in research, which could be unduly influenced by outcome measures developed by the intervention developers. Thus, instead of the proposed change, KA suggests that the WWC propose that outcome measures which are not independent be criterion-referenced, constructed independently of the product, independently validated and meet standards of reliability.

Attrition

Knowledge Alliance **supports** the changes to the *Handbook* when attrition bias is assessed because the proposed change recognizes that statistical procedures can attempt to adjust for the potentially biased effects of attrition. Additionally, KA **supports** the proposed flexibility for WWC reviewers to determine between an optimistic or cautious attrition boundary for a specific review which is a change from the review protocol determining the choice. This proposed change recognizes that the assumption of whether to use an optimistic or cautious boundary for a specific review depends on the factors observed in studies.

Bundled/Combined Interventions

Knowledge Alliance **appreciates** the proposed change to no longer consider bundled-or combined-interventions a confounding factor in review of individual studies. However, it would be helpful if the *Handbook* provided example(s) of a bundled intervention.

Thank you for the opportunity to comment on the *What Works Clearinghouse (WWC) Procedures and Standards Handbook, Version 5.0*. If you have questions, please do not hesitate to contact Rachel Dinkes at rdinkes@knowledgeall.net and Soraya Zrikem at szrikem@pennhillgroup.com.

Best,

A handwritten signature in black ink that reads "Rachel Dinkes". The signature is written in a cursive style with a large initial "R" and a long, sweeping underline.

Rachel Dinkes
President, Knowledge Alliance