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American Institutes for Research

Basis Policy Research

Cognia

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Education Analytics

Education Development Center

Education Northwest

Education Testing Service

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Learning Forward

Marzano Research

Policy Studies Associates

Results for America

RMC Research Corporation

SRI International

University of OK, College of Continuing Education – Outreach

Westat

WestEd

October 3, 2022

Denice Ross
U.S. Chief Data Scientist
Office of Science and Technology Policy
1650 Pennsylvania Avenue NW
Washington, DC 20502

Re: Engagement and Accountability Notice of Request for Information, Office of Science and Technology Policy (OSTP) – Document Number 2022 - 19007

Dear Ms. Ross,

I am writing on behalf of Knowledge Alliance (KA) with comments and recommendations in response to the Office of Science and Technology Policy (OSTP) request for information (RFI) on identifying equitable data engagement and accountability practices between Federal agencies and other levels of government. 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. 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.

Knowledge Alliance believes the collection and dissemination of high-quality research and evidence is integral to innovating and improving learning outcomes for all students, especially those who have been historically marginalized. Our members strive to support the collection and analysis of equitable data that is disaggregated by demographic information to enable insights on disparities in student academic outcomes from the U.S. Department of Education (ED), State educational agencies (SEAs), and local educational agencies (LEAs). KA has been actively engaging around these issues, particularly following the release of the National Academies of Sciences, Engineering, and Medicine (NASEM) report titled "Toward a Vision for a New Data Infrastructure for Federal Statistics and Social and Economic Research in the 21st Century." We applaud the Administration for investing in the creation of a "durable, equitable data infrastructure" across all levels of government and in tandem with external organizations, like ours. While our response focuses on the collection and transmission of equitable data in education, we believe our members' experiences and recommendations can be extrapolated to other sectors. We appreciate the opportunity to respond to this RFI and have provided the responses below to select questions, numbered in order of how they appear in the Federal Register notice.

Responses to Questions

1. What are examples of successful collaborations involving equitable data between the Federal government and (a) Tribal, territorial, local, and State governments, or (b) local communities?

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- ***State Tribal Education Partnerships Program:*** The State Tribal Education Partnerships (STEP) Program was created to promote increased collaboration between tribal education agencies (TEAs) and the SEAs and LEAs that serve students. In 2021, the STEP program generated four webinars providing technical assistance to grantees on logic models and data-driven decision making. Knowledge Alliance members have found that providing technical assistance directly to State and local contexts streamlines the collection of high-quality data.
- ***Native Education Collaborative:*** The National Comprehensive Center (NCC), led by Westat and funded by ED, established the Native Education Collaborative (NEC) to provide additional support to Indian/Alaska Native students. The NEC develops and disseminates resources, including a facilitated framework called Circles of Reflection, to help build SEAs capacity to more comprehensively support Native education through collaboration with districts and tribes. Circles of Reflection also involves rich, collaborative conversations between SEAs, tribes and districts, on topics such as what the SEAs are doing or not doing to support data sharing, to jointly determine priorities; and then collectively develop and implement plans to improve Native education. The NCC has facilitated Circles of Reflection in five States
- ***National Center on Program Management and Fiscal Operations:*** The National Center on Program Management and Fiscal Operations (NCPMFO) works with the Office of Head Start to strengthen program management, disseminate evidence-based management strategies, and inform fiscal policies. NCPMFO creates materials, webinars, webcasts, and training modules to support Head Start grantee data collection and analysis.

2. Among examples of existing Federal collaborations with (a) Tribal, territorial, local, and State governments or (b) local communities involving equitable data, what lessons or best practices have been learned from such collaborations?

- ***Incorporate Field Perspectives:*** In any technical assistance efforts with TEAs, SEAs, or LEAs, KA members emphasize the importance of building strong relationships and providing culturally responsive services that directly meet the field's needs. To create an equitable data infrastructure, those at the local level need a voice in shaping what data is collected and how it is analyzed.

3. What resources, programs, training, or other tools can facilitate increased data sharing between different levels of government (Tribal, territorial, local, State, or Federal) related to equitable data?

- ***State Longitudinal Data Systems:*** Knowledge Alliance has been actively advocating for improvements to the Statewide Longitudinal Data Systems (SLDS) over the past year. The initial investment in SLDS provided States with the resources needed to design, develop, implement, and expand K-12 and P-20W (Pre-K to workforce) longitudinal data systems. These initial investments have been extremely helpful to States; however, KA strongly believes that the Federal government should invest additional resources to improve the utility of these systems to maximize their potential to increase data sharing. Moreover, our members believe that the Federal government should accompany these investments with a nationwide SLDS strategy, rather than support State by State implementation, to create efficiencies and scalability across States. To that end, KA supports IES Director Mark Schneider's call for a SLDS 2.0 which would make SLDS data more accessible by:

- o "Using a modern, often cloud-based, architecture
- o Emphasizing interoperability
- o Aligning coding schema and data definitions across States
- o Making data more widely available while remaining consistent with existing and future privacy laws at the State and Federal level
- o Integrating data from early childhood through labor market outcomes and for other services States identify"

Additionally, KA member Education Analytics has [advocated](#) for SLDS 2.0 to invest in a reference software build (e.g., a template) that would create a common schema that States could customize to their needs and build off of, instead of each State building their own interoperable system from the ground up. A standardized SLDS software template would enable interoperability between State datasets (e.g., facilitate data sharing and merging, streamline Federal reporting efforts). Overall, KA is a strong supporter of SLDS' efforts and believes there is progress to be made in increasing States' data interoperability and accessibility. We know that SLDS funded projects are collecting swaths of data that can be used to address inequities from pre-K to workforce. We encourage OSTP to track SLDS' programs and its successes and push to expand and enhance these systems.

- **State Report Cards:** Under the Elementary and Secondary Education Act (ESEA), SEAs and LEAs that receive Title I, Part A funds must create an annual report card that includes a variety of data about public schools, such as measures on student performance, accountability, per-pupil expenditures and educator qualifications. The comprehensive data provided by [State report cards](#) has potential to offer administrators, educators, parents, and communities critical information on academic and non-academic performance in an easy-to-read manner. It is difficult, however, to study trends across States, districts, and schools since there is no standardized methodology between State report cards. This means that States are using different metrics to collect and analyze their data. Knowledge Alliance members believe that standardizing State report card metrics could strengthen the tool and provide a more uniform set of data to school leaders, educators, families, and students. We encourage OSTP to investigate the work of the [Common Education Data Standards](#) (CEDS) which has been providing common element names and definitions across the entire P-20W system, standardizing the current vocabulary of data elements while also making them more accessible and user-friendly. By leveraging a tool like CEDS, we believe standardized State report card data could be further used to provide insight on the challenges students from historically marginalized populations face and to inform solutions.

6. What resources, programs, training, or tools can make equitable data more accessible and useable for members of the public?

- **Regional Educational Laboratories (RELs):** KA encourages OSTP to leverage 10 [Regional Educational Laboratories (RELs)](#), which work in partnership with SEAs, LEAs, and other education stakeholders, to support the collection of equitable data for education research and to inform policymaking. RELs partner with districts, States, and other education stakeholders to identify high priority needs and conduct applied research to address such needs, helping stakeholders understand problems and learn what is working in their schools. RELs produce clear, objective,

and peer-reviewed research products designed to be actionable for partners and national audiences alike. RELs also develop toolkits that support the scaling up of best practices, such as those identified through the What Works Clearinghouse's Practice Guides on topics like "Using Student Achievement Data to Support Instructional Decision Making." REL's are strategically placed to disseminate high-quality information to their partners and could be leveraged to share information about data usage best practices to the public. REL dissemination activities, products, and strategies are co-developed in partnership with policymakers and educators to help ensure that they can leverage and apply research evidence in their local context. We believe RELs could be meaningfully used in the education space to provide direct technical support to the public regarding the use of equitable data.

- **Comprehensive Centers (CCs)**: The Comprehensive Center (CC) program supports the establishment of 20 CCs that provide capacity-building services to SEAs, LEAs, and schools to improve educational outcomes for all students, close achievement gaps, and improve the quality of instruction. The National Comprehensive Center (NCC) is already making headway on improving the data SEAs and LEAs can use to answer questions relating to diversity, equity, and inclusion. In February 2021, the NCC began a community of practice with teams from seven States utilizing the following recommendations from the 2019 NASEM report, "Monitoring Educational Equity," to identify key indicators for measuring and monitoring the extent of equitable opportunities and outcomes in low-performing schools. The Committee identified a core group of equity indicators with the expectation that different educational agencies could select constructs or add indicators tailored to each local system's needs. These indicators can guide the collection and use of educational data through an equity framework. As the NCC's work shows, CCs are well positioned to provide the SEAs and LEAs with technical assistance on the collection and analysis of equitable data.

- **IES' "Ask An Expert" Service:** The new "Ask an Expert" service provides rapid-turnaround methodological expertise, and evidence-based thought partnering to SEAs and LEAs. IES' "Ask an Expert" services help SEAs and LEAs succinctly answer research-related questions based on the evidence-based subject matter. SEAs and LEAs can also use the "Ask an Expert" service to build their own capacity to design research to answer pressing questions of policy or practice. "Ask an Expert" services are designed to provide answers to requestors in a matter of weeks, not months or years. The RELs stand ready to provide more intensive training, coaching, and technical supports in cases where an "Ask an Expert" request may not be feasible to complete within 4-5 weeks.

Please reach out to Rachel Dinkes at rdinkes@knowledgeall.net with any questions.

Best,

Rachel Dinkes, President