knowledge alliance

April 19, 2023

Honorable Bernard Sanders
Chairman
Committee on Health, Education, Labor,
and Pensions
United States Senate
Washington, DC 20510

Honorable William M. Cassidy, MD
Ranking Member
Committee on Health, Education, Labor,
and Pensions
United States Senate
Washington, DC 20510

Dear Chairman Sanders and Ranking Member Cassidy:

I am writing to provide the recommendations of Knowledge Alliance on the reauthorization of the Education Sciences and Reform Act (ESRA) in response to your request for input. Knowledge Alliance, a non-partisan, non-profit organization, is composed of leading education organizations committed since 1971 to the cutting-edge, effective use of high-quality and relevant data, research, evaluation, and innovation in education policy and practice at all levels. Our members have long and extensive experience carrying out research, evaluations, data collections, technical assistance, and dissemination activities authorized by ESRA, including in operating the Regional Education Laboratories (RELs) and Comprehensive Centers (CCs). We have a keen interest in the reauthorization of ESRA and believe that, based on our experiences, we bring an important perspective to the HELP Committee's deliberations. Knowledge Alliance commends the Committee for taking up the ESRA reauthorization at this time.

Over the past 20 years, IES has produced evidence that explored and answered critical questions about learning, education, knowledge mobilization and implementation. With the knowledge we have acquired, we are at a pivotal moment of unprecedented promise to make a transformational impact, which is particularly critical given evidence of how heavily the COVID-19 pandemic has impacted student learning. KA's vision for reauthorization is grounded in modernizing all aspects of education research, evaluation, statistics, and technical assistance. From foundational studies to innovative research and technical assistance, there is a continuum of activities that are critical to advancing our understanding of how to improve educational outcomes for students. Each type of research plays a unique role in building knowledge and informing practice, and all are necessary for driving progress in education. KA's vision also ensures that that IES' work is directly connected to the needs of students, educators, and communities. As the Committee reauthorizes these important laws, we also urge you to call for increased investments in Federal education research. New and expanded policy deserves increased funding to give the new vision a fighting chance of success.

Attached to this letter are our main recommendations for ESRA reauthorization. In addition, KA was supportive of the 2022 National Academies of Sciences, Engineering and Medicine (NASEM) reports commissioned by IES and I have attached KA's response to the report's recommendations. In the coming days, we will provide the Committee with a detailed specification of the changes that we propose be

made in the current statutory language. We would like to thank you for the opportunity to provide the perspectives of Knowledge Alliance on this important topic. Again, we thank the Committee for initiating action on the reauthorization of ESRA and ETAA, which is long overdue. If I can be of any additional assistance, please do not hesitate to contact Rachel Dinkes at rdinkes@knowledgeall.net.

Sincerely,

Rachel Dinkes
President

KA ESRA Reauthorization Recommendations

1. **Maintain a strong focus on carrying out foundational research that can have a transformative impact on education.**
   - Ensure that ESRA continues to authorize foundational research in areas such as reading and literacy, early childhood education, English Language Learners, and students with disabilities because of the continuing need for evidence-based solutions that, when brought to scale, can significantly "move the needle" in these areas.
   - Update the statute by specifically authorizing research and development in such areas as knowledge mobilization, teacher education, leadership development, workforce development, education technology, and learning analytics.

2. **Ensure that IES activities are undergirded by strong definitions of "scientifically valid research standards" and "evidence-based."**
   - Replace the current ESRA definitions of "scientifically based research standards" with a definition of "scientifically valid research standards" that more accurately captures the universe of research activities that should be supported by IES and that is consistent with language now included in the Higher Education Act and the Head Start Act. Use that term throughout the two statutes in order to ensure that a single set of comprehensive research standards covers all ESRA programs and activities.
   - Add the term "evidence-based" as currently defined in the Elementary and Secondary Education Act (ESEA) and use the term throughout the two statutes so as to ensure that the research, evaluation, and technical assistance activities carried out are aimed at producing and disseminating educational strategies and interventions that have clear evidence of effectiveness.
   - Require that ED issue guidance on the implementation of evidence-based strategies, interventions, and activities, as appropriate for use by Federal, State, local, and school-level officials administering ED programs.
   - Mandate that IES contract with the National Research Council for a timely review of IES's and ED's implementation of the statutory requirements with respect to the conduct of "scientifically valid research."

3. **Maintain the independence of IES, and its basic structure to produce transformative education research that will advance education equity and ground research in the experience of learners, educators, and communities.**
   - Provide a more transparent and engaging process by which practitioners, SEAs, LEAs, and researchers can contribute to the articulation of new topics of research to ensure that projects are directly connected to the needs of students, educators, and communities.
   - Update the statutory language on the responsibilities of the National Center for Education Research (NCER), the National Center for Education Statistics (NCES), and the National

Center for Special Education Research (NCSER) to reflect current and emerging needs, such as those related to recovery from the COVID-19 pandemic and other critical, equity-based concerns.

- Provide flexibility for the Commissioner of Education Research, to establish national research and development centers that address topics of importance and relevance in the field.
- Increase transparency around (1) how priority topics are being identified; (2) engagement with stakeholders; (3) participation and success of training programs; and (4) information on research applicants at both the individual and institutional levels.
- IES should regularly collect and publish information on the backgrounds of applicants and funded principal investigators and co-PI's for review panels, and study samples.
- Update the statutory description of the functions of IES and its Director so as to ensure that all activities carried out by the Institute are relevant and useful and that all products IES produces are widely disseminated to researchers, policymakers, practitioners, and the public.

4. **ED should actively collaborate with other data-holding federal agencies and organizations to develop useful products and processes to provide timely, policy relevant insights.**
   - Require that ED and IES co-develop and align their standards of rigor for research and evidence use, with public comment, and apply them to all appropriate programs, including Regional Educational Labs (RELs), the Comprehensive Centers (CCs), National Education Research & Development (R&D) Centers, and IES competitive grants programs.
   - Prioritize timely, effective knowledge mobilization of research and evaluation results generated by the RELs, the CCs, R&D Centers, and other IES research to ensure that States, school districts, and schools have continuous access to the latest evidence on which educational strategies and interventions work and in what contexts.
   - Ensure effective collaboration and consultation between IES and ED on all evaluations of impact, implementation and utilization of funds across Federal education programs as outlined in Section 8601 in ESEA. For policy relevance, ensure that rigorous studies of program implementation in different contexts are conducted.

5. **Strengthen the ability of the RELs to serve their customers effectively.**
   - Maintain the current language specifying the REL governing board's structure, including continuing to require that the board includes the chief State school officer from each State in the region (or the chief's designee) and to provide that the board has full authority over the REL's priorities and work plans, so as to ensure that REL activities address regional needs.
   - Continue to require that the RELs program is administered through contracts so as to enable a broad range of offerors to compete for and receive awards.

- Clarify the critical role of RELs in conducting applied research on improving teaching and learning, including by providing analytical support.
- Authorize the RELs to conduct a full range of scientifically valid research activities that address practice-based questions.
- Highlight the opportunity for RELs to undertake innovative approaches and collaborations to bridge the gap between research and practice, such as research-practice partnerships and research alliances.
- Ensure, through appropriate statutory language, that RELs have the flexibility to respond quickly to stakeholder needs.
- Maintain a separate authorization of appropriations for the RELs.
- Ensure, through appropriate statutory language, that ED evaluations of the RELs are timely and based on the full body of the RELs' work.

6. **Strengthen the capacity of the CCs to serve their stakeholders effectively.**
   - Maintain the current requirement that ED fund at least 20 CCs, including at least one in each of the geographic regions served by the RELs.
   - Allow flexibility as authorized for the Secretary of Education to establish additional comprehensive centers that provide technical assistance on areas of importance to the nation.
   - Eliminate the role of Regional Advisory Councils (RACs) while continuing the expectations that CCs would conduct needs assessments to inform their work.
   - Clarify that the role of CCs is to provide high quality capacity building support to SEAs, REAs, and LEAs to: address high leverage problems, undertake systemic improvements; implement and scale evidence-based policies and practices; redress inequities in opportunities and outcomes; and support effective implementation of federal education laws. Regional comprehensive centers provide intensive capacity building to develop human, organizational, policy and resource capacities of SEAs and LEAs.
   - Ensure, through appropriate statutory language, that ED evaluations of the CCS are objective, timely, and based on the full body of the CCs' work.

7. **Continue and strengthen the State Longitudinal Data Systems (SLDS) program.**
   - Require that SLDS grants are made through a peer-review process that ensures technical quality.
   - Require that ED develop performance measures for the SLDS grants, which the Department would use to gauge the ongoing performance and progress of grantees.
   - Ensure that the data included in State's SLDSs are relevant, useful, accessible, and widely disseminated (taking care to abide by all privacy requirements).
   - Expand the eligible applicant pool for SLDS grants to include the Governor or other data governance bodies or organizations managing or overseeing a State's SLDS.

- So as to encourage greater consistency and interoperability of data and data systems across States: (1) add language encouraging States' SLDS managers to coordinate their activities with other States; (2) require that all SLDSs use a common set of data standards, which could be established by NCES; and (3) authorize ED to make grants or enter into contracts to facilitate interoperability and coordination.

8. **Authorize IES to carry out innovative research and development endeavors that can lead to breakthrough, scalable advances of effective educational solutions.**
   - Prioritize the development and testing of innovations that are carried out by partnerships of, at a minimum, researchers, evaluators, and consortia of State or local educational agencies so as to help ensure that innovations reflect State and local needs, are implemented with fidelity, and can easily be scaled.
   - Ensure that innovations supported under any new authority are directly connected to urgent student needs, including the needs of children with disabilities, English learners, and students whose educational achievement was affected by the pandemic. Applicants for innovation projects should be required to demonstrate how the proposed innovation will directly address such learners' needs.
   - Structure IES's authority to support innovative research and development in a manner that is flexible enough to enable a rapid response to critical needs but also provides for competition and transparency. Indeed, the reauthorization should require greater transparency, particularly with respect to the peer-review process, across the full range of IES functions and activities.

9. **Authorize the creation of a new program within IES, aligned to the NCADE proposal, that funds research to find education innovations that have increased probability of scaling, meet the needs of the field, and that have rigorous evidence of impact.**
   - Require that IES creates a new center that: (1) funds projects jointly carried out by researchers and developers for the purpose of building effective educational innovations, such as rapid cycle, transformative research and technological solutions, that can quickly scale up and be put into practice; and (2) is sensitive to needs identified in the field.
   - Mandate that this program has, as one of its priority activities, supporting projects carried out by partnerships that, at a minimum, include researchers and State and local educational agencies (SEAs and LEAs) to ensure that innovations are high-quality, relevant, actionable, and affordable. Ensure, through appropriate statutory language, that all members of such a partnership would be involved in the carrying out of grant, contract, and prize activities from the beginning.

10. **Reinforce existing ESRA language to protect student privacy.**
    - Strengthen language throughout ESRA that reinforces and protects student privacy around how information is viewed and used while also expanding access to data sets under Confidential Information and Statistical Efficiency Act (CIPSEA) CIPSEA protections.
    - For primary collections, NCES should modernize standard language on consent and planned usage, to permit secure secondary uses that enable high-quality follow-up studies, such as through privacy-protected linkages with other data sources.
    - Formally authorize the Privacy Technical Assistance Center (PTAC) to help groups understand how to safely share information for the purposes of evidence building. Authorize the PTAC to share best practices and provide technical assistance on the safe facilitation of data sharing between partners such as researchers, education technology companies and SEAs/LEAs.
    - For primary collections, NCES should modernize standard language on consent and planned usage to permit secure secondary uses that enable high-quality follow-up studies, such as through privacy-protected linkages with other data sources.

11. **Increase the federal investment in research, development, knowledge mobilization, capacity building, and technical assistance Implementation support.**
    - 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.