



Zachary Rogers
U.S. Department of Education
400 Maryland Avenue SW
Washington, DC 20202-6450

June 20, 2025

Dear Mr. Rogers,

I am writing to provide the comments on the [notice](#) of Proposed Priorities, Requirements, Definitions, and Selection Criteria as published by the U.S. Department of Education (ED) on May 21. [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, KA and its members promote the use of rigorous research to figure out what works to improve student outcomes and empower schools, districts and all 50 States with the tools and resources needed to improve learning and outcomes for every student.

We appreciate ED's first proposed priority- Promoting Evidence Based Literacy. KA acknowledges the urgent need to address declining reading scores and provide direct support to help parents, teachers, schools leaders and other stakeholders address stubbornly low literacy rates. Specifically, we appreciate ED's focus on supporting evidence-based literacy instruction and supporting projects that have been tested and evaluated to ensure they can help improve students' literacy outcomes at all grade levels Pre-K through grade 12.

In addition, we appreciate ED's inclusion of an evidence framework in this notice. However, KA would urge ED to replace the current definition of an evidence framework under the proposed definitions with the definition of tiers of evidence based as defined in ESEA. While we strongly support the inclusion of a definition of evidence to assist States, districts, schools and practitioners in classifying evidence, we believe that using the definition of evidence based in ESEA will help ensure a consistent definition of "evidence" across ED programs and statutes.

The education R&D field, with the leadership of the Federal government, has done a lot of work to familiarize parents, teachers and policymakers about the tiers of evidence included in the Every Student Succeeds Act (ESSA) definition of evidence. The ESSA tiers came from a recognition that balancing rigor and quality in research was necessary to ensure that taxpayer dollars are being spent on programs with a track record of effectiveness. Using this definition will help streamline ED's grant making process by creating consistency in what qualifies as strong research and effective practice across all ED programs. A common definition also allows grantees to more easily understand and meet requirements, reduces



duplication of effort in interpreting different standards ultimately making the grantmaking process more efficient for both ED and grantees. and makes it easier for ED in the grantmaking process.

KA would like to thank ED for the opportunity to provide feedback on the Secretary's Supplemental Priorities and Definitions on Evidence-Based Literacy, Education Choice, and Returning Education to the States. NAEP scores tell us that for most groups, student achievement is stalling or declining. We share ED's desire to change this trend by continuing to understand what is working for students and ensure that investments made by ED are driving meaningful impact for students. In order to support evidence-based accountability, data-driven decision making, and education research for use in the classroom, it is essential that ED have a robust, funded, and fully functional IES. The comments provided above are informed by KA's extensive experience in the field, and we believe they illustrate ways in which ED can ensure an efficient and streamlined grantmaking process to achieve its priorities as laid out in this notice.

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

Sincerely,

A handwritten signature in black ink that reads "Rachel Dinkes". The signature is written in a cursive, flowing style.

Rachel Dinkes
President