

Response for Request for Information: Feedback on Redesigning the Institutes of Education Sciences (IES) (Docket ID: ED-2025-IES-0844)

The National Academy of Education (NAEd) is pleased to provide this response to the Request for Information (RFI) for "Feedback on Redesigning the Institutes of Education Sciences (IES)." IES plays a critical role in informing U.S. education policy by supporting, engaging in, and disseminating rigorous, independent education research.

The NAEd is a nonpartisan, nonprofit organization that advances high-quality research to improve education policy and practice. Founded in 1965, the NAEd has approximately 350 members, including those in the United States and international associates, who are elected on the basis of their leading and trusted scholarship related to education. The NAEd undertakes research studies to address pressing educational issues and administers professional development fellowship programs to enhance the preparation of the next generation of education scholars. These NAEd research studies often rely on IES-collected data and IES-funded research. Similarly, NAEd members rely significantly on IES data to inform their research. Moreover, the NAEd and its members have received funding from IES and its Centers. NAEd members have served on the former National Board for Education Sciences, and on the Committee on the Future of Education at the Institute of Education Sciences which authored the *Future of Education Research at IES: Advancing an Equity-Oriented Science*, a consensus study by National Academies of Sciences, Engineering, and Medicine (NASEM).

The NAEd fully supports IES, the "independent and non-partisan" "statistics, research, and evaluation arm of the U.S. Department of Education" which "provide[s] scientific evidence on which to ground education practice and policy and to share this information in formats that are useful and accessible to educators, parents, policymakers, researchers, and the public." (https://ies.ed.gov/about) And, it applauds IES as it continues to seek to improve how it carries out its mission, codified in the Education Sciences Reform Act (ESRA) of 2002, and the work of its Centers (similarly codified).

¹ Recent examples of NAEd studies and projects relying on IES data include <u>Evaluating and Improving Teacher</u> <u>Preparation Programs: Consensus Report</u> (2024), <u>Reimagining Balanced Assessment Systems</u> (2024), <u>Addressing Educational Inequities in the Wake of the COVID-19 Pandemic</u> project (2020-2025), and <u>Educating for Civic</u> <u>Reasoning and Discourse</u>.

In response to the RFI, which seeks input on "how IES can modernize its programs, processes, and priorities to better serve the needs of the field and American students," the NAEd provides the following principles that should guide IES efforts.

Comply with all Congressional Mandates

Since the 1860s, the federal government has dedicated significant resources towards the collection, analysis, and dissemination of high-quality educational data for the benefit of our nation's students.² To that end, it has worked to improve and expand educational statistical research and provide additional resources for the evaluation of the United States educational system.³ On November 5, 2002, President Bush signed H.R. 3801, which included ESRA, a landmark act for the improvement of federal education research, statistics, evaluation, information, and dissemination. Through ESRA, Congress recommitted to prioritizing the federal government's role in educational data collection, evaluation, and dissemination. ESRA reconstituted IES within the U.S. Department of Education as an independent research division. See Pub. L. 107-279;20 U.S.C. §§ 9501–84. In creating IES, Congress established the division's mission as "expanding fundamental knowledge and understanding of education from early childhood through postsecondary study, in order to provide parents, educators, students, researchers, policymakers, and the general public with reliable information about—(A) the condition and progress of education in the United States, including early childhood education; (B)educational practices that support learning and improve academic achievement and access to educational opportunities for all students; and (C) the effectiveness of Federal and other education programs." See id. § 9511.

IES has a congressional mandate to "directly or through grants, contracts, or cooperative agreements . . . (1) conduct and support scientifically valid research activities, including basic research and applied research, statistics activities, scientifically valid education evaluation, development, and wide dissemination; (2) widely disseminate the findings and results of scientifically valid research in education; (3) promote the use, development, and application of knowledge gained from scientifically valid research activities; (4) strengthen the national capacity to conduct, develop, and widely disseminate scientifically valid research in education; (5) promote the coordination, development, and dissemination of scientifically valid research in education within the Department and the Federal Government; and (6) promote the use and application of research and development to improve practice in the classroom." See id. § 9512.

2

² Snyder, T. D. (1993). *120 Years of American Education: A Statistical Portrait*, Nat'l Ctr. for Educ. Stat., https://nces.ed.gov/pubs93/93442.pdf.

³ Id.

To carry out these mandates, Congress requires IES to operate four Centers – the National Center for Education Statistics (NCES), the National Center for Education Research (NCER), the National Center for Special Education Research (NCSER), and the National Center for Education Evaluation and Regional Assistance (NCEE). Moveover, IES and its Centers are congressionally mandated to rigorously and validly carry out numerous data collections and report and disseminate the collected data, including but not limited to the National Assessment of Educational Progress (NAEP), Common Core Data (CCD), EDFacts, National Post Secondary Student Aid Survey (NPSAS), Integrated Postsecondary Education Data System (IPEDS), Educational Longitudinal Studies (ELS), Early Childhood Longitudinal Study (ECLS), High School Longitudinal Study (HCLS), Baccalaureate and Beyond Longitudinal Study (B&B), Beginning Postsecondary Students Longitudinal Study (BPS), National Household Education Survey (NHES), and the Trends in International Mathematics and Science Study (TIMSS).

Additionally, through congressional funding, the Centers fund training programs for the next generation of education scholars and through competitive grants provide funding to support education research.

IES was created to continue and expand the critical role played by the federal government to collect and disseminate high-quality data. IES is the backbone of the research and data necessary to monitor the quality of the public education and to measure and evaluate interventions to improve education for all students.

The NAEd submits that foremost, in any effort by IES to "modernize its programs, processes, and priorities," it must comply with its congressional mandates.

Recommendations

In response to a request from IES, the National Academies of Sciences, Engineering, and Medicine (NASEM) convened a committee of experts to "provide guidance on the future of education research at the National Center for Education Research and the National Center for Special Education Research. The committee was tasked with providing guidance on critical problems and issues where new research is needed, how to organize the request for applications, new methods and approaches, and new and different kinds of research training investments." In 2022, this 15-member committee issued a research-informed report, <u>The Future of Education Research at IES: Advancing an Equity-Oriented Science</u>, with recommendations across the following categories: (1) project types for NCER/NCSER grants; (2)

⁴ National Academies of Sciences, Engineering, and Medicine (2022). *The Future of Education Research at IES:* Advancing an Equity-Oriented Science, at p.2. The National Academies Press. https://doi.org/10.17226/26428.

research topics for NCER and NCSER grants; (3) methods and measures; (4) broad and equitable participation in NCER and NCSER research training programs; (5) application and review process; and (6) enabling of NCER/NCSER work (i.e., investigating funding processes to identify inequities and expanding IES's budget).

The NAEd endorses the recommendations in this NASEM report and suggests that they be incorporated in any modernization of IES.

Additionally, the NAEd makes the following recommendations:

- 1. Re-constitute the staffing of IES. As the NASEM report indicated, since its establishment in 2002, IES has had limited staffing to accomplish its tasks and needed additional staffing. The current cuts in IES do not allow IES to meet its congressional mandates.
- 2. Maintain the National Center for Education Statistics (NCES) and its essential data collection mandates.
- 3. Expand topics and research designs that include and go beyond student outcomes. In addition to cognitive outcomes, include broader developmental outcomes and practices, warranted by current findings (particularly through interdisciplinary research across cognitive and social psychology, human development, and the neurosciences) that cognition, emotions, and perceptions all intersect in dialogical relationships.
- 4. Expand the breadth of priorities to address the complex ecologies in which learning unfolds. These priorities should address the array of stakeholders, including students, families, communities, professionals in the world of direct practice, professional associations such as those led by teaching professionals, and policy makers at district, state and federal levels. These priorities should also address the range of learning settings that include but are not limited to schools.
- 5. Move beyond a transmission model for the dissemination of research findings. Currently, What Works Clearinghouse, Practice Guides, and the work of RELS serve as the primary vehicles through which findings from IES funded research is disseminated, but there is not a sufficient model in place to facilitate the interrogation of such findings in practice. In this vein, prioritizing research on knowledge mobilization would facilitate the state of relations among research, practice, and policy in the country.
- 6. We understand there are considerations underway around the role of the Regional Educational Labs that include closer relationships with states. While having Regional Labs be responsive to particular needs within states is worthwhile, this must be balanced with IES supporting the development of scientific findings that have generalizability and that are warranted by an ethical commitment to equity in opportunity to learn. This is important considering the differences in priorities in

- education across states, some of which are divisive and not contributing to a broader civic good.
- 7. Expand the breadth of methodological foci supported by IES to include analytic designs and methods that wrestle with complex systems and not limit research to causal designs that presume simplistic relations of causality.
- 8. Ensure that research and research training grant programs are run competitively and include independent scientific peer review processes. The independent scientific peer reviewers should have the appropriate expertise to conduct the reviews, and the processes should remain independent of both NCER and NCSER (under the primary responsibility of the Office of Science).
- 9. Broaden and publicly document the range of diversity in grantees and reviewers, both in terms of individuals, institutions, and disciplines represented.

Conclusion

The United States, from its inception, has crafted an experiment in democratic governance that is complex. Rooted in the U.S. Constitution is a vision of a society in which democratic goals that respect the rights of individuals, that seek to structure opportunities to navigate the rights of individuals in conversation with ethical commitments not to inflict harm, to navigate relationships across minorities and the majority, and to navigate these tensions through multiple opportunities for civic engagement (e.g., voting). These all require a public who are knowledgeable, disposed to wrestle with complexity, to empathize with others, to navigate multiple points of view. NAEd has addressed this dilemma in its report *Educating for Civic Reasoning and Discourse*. Our system of public education is the primary vehicle for supporting the development of such knowledge and dispositions. These dispositions are not exclusive to any particular political party. Our people – children, adolescents, adults – are also citizens of the world. We live in an ever increasingly inter-dependent world where we face equally complex challenges that require deep knowledge across fields of study, ethical commitments for a search for a common good, and dispositions to engage with complexity and nuance.

For these sacred obligations, IES plays a critical role in supporting the development of scientifically warranted research to inform the practice of education within schools and across community sites of practice. This requires valuing research that wrestles with complexity, with better understanding of the processes through which knowledge is taken up and interrogated by multiple stakeholders. We encourage the Department of Education to take up these challenges as we re-examine the work of the IES. We at the NAEd will continue to serve as a resource for this most important work.