



**The Education Trust**

Closing the gaps in opportunity and achievement, pre-K through college.

September 16, 2021

Matthew Soldner  
Commissioner, National Center for Education Evaluation and Regional Assistance & Evaluation Officer  
Institute of Education Sciences  
U.S. Department of Education  
400 Maryland Avenue SW, Room 4160  
Potomac Center Plaza  
Washington, DC 20202

RE: Request for Information on the Department of Education's Fiscal Year (FY) 2022-2026 Learning Agenda ([Docket ID ED-2021-IES-0118](#))

Dear Commissioner Soldner,

On behalf of The Education Trust, an organization dedicated to closing long-standing gaps in opportunity and achievement that separate students from low-income backgrounds and students of color from their peers, thank you for the opportunity to comment on the U.S. Department of Education's ("the Department") request for information regarding the Department's FY 2022 – 2026 Learning Agenda. The Department broadly, and the Institute for Education Sciences (IES) specifically, plays a critical role in building evidence to identify the policies, practices, and strategies that can address these opportunity gaps.

For each of the six areas the Department has proposed to focus its FY 2022 – 2026 evidence-building activities on, we write to share our recommendations for: (1) the most important questions about which evidence should be built in each area; and (2) specific evidence-building activities that should be undertaken to answer those questions.

[Proposed Focus Area #1: Addressing the impact of COVID-19 on students, schools and institutions of higher education, educators, and their communities.](#)

We are encouraged to see a focus on addressing the impact of COVID-19 on students, schools, institutions of higher education, educators, and communities. We know that the pandemic has affected everyone — but it has not affected everyone equally. It has compounded educational inequities for students of color, students from low-income backgrounds, English learners, students with disabilities, students experiencing homelessness, and their communities. That is why the Department should ensure its evidence-building activities are primarily focused on underserved students, schools, institutions of higher education, and the educators serving those communities.

*We recommend the Department focus on the following questions and evidence-building activities:*

- Which interventions were the most effective in supporting students to get to grade level, particularly for underserved students? How much academic progress did students make after receiving a year of [high-quality tutoring](#)?
  - *Related evidence-building activity:* Multi-site study to examine the effectiveness of evidence-based/practice-based interventions to alleviate the negative impacts of COVID-19

on student social, emotional, and academic outcomes. The study must include a variety of school settings and student populations to understand potential differentiated effects.

- How has the digital divide widened or diminished since the onset of the pandemic? What strategies and interventions are best to address this?
- Has virtual learning become a long-term tool or approach that schools will continue to use past the COVID-19 pandemic, particularly for underserved students? In what ways? What is the impact of virtual learning on student immediate and long-term social, emotional, and academic outcomes?
- Which students and schools had more access to remote instruction, hybrid, or in-person instruction during the pandemic? How did the quality of virtual or hybrid learning vary across schools and districts, including for schools and districts that serve more underserved students, and what lessons can we learn from places that did it well?
  - *Related evidence-building activity:* Conduct nationally representative surveys to learn from the experiences of educators, students, and families.
- How widely used is grade retention as a strategy for addressing students' unfinished learning? What is the impact of grade retention on academic, social, and emotional well-being, especially for underserved students?
- What strategies were most effective at re-engaging students who became disconnected from school during school closures and/or remote learning?
- What kind of professional development opportunities are most effective in preparing and supporting educators and school staff (e.g., school counselors) to address student well-being, particularly for underserved students, and their own well-being?
- What is the short-term and long-term impact of homelessness and unstable housing on students' social, emotional, and academic outcomes?
- What additional resources, including funding would be needed to address unfinished learning in the schools and districts where the need is most pronounced?
- Are Asian American and Pacific Islander (AAPI) students facing greater discrimination or bullying in schools due to the COVID-19 pandemic? In what ways?
  - *Related evidence-building activity:* Conduct nationally representative surveys, including disaggregated data by ethnicity, home language, and family income, to learn from the experiences of AAPI students and families.
- How did institutions of higher education successfully retain and enroll students (especially students of color and those from low-income backgrounds) during the COVID-19 pandemic?
  - *Related evidence-building activity:* Survey higher education institutions and educators.
- How many students in higher education (with a special focus on students of color and those from low-income backgrounds) were forced to discontinue their enrollment given challenges presented by the COVID-19 pandemic?

- *Related evidence-building activity:* Analyze projected enrollment and actual enrollment data from academic year 2020-21 for continuing students.
- How did higher education institutions shift institutional spending based on the COVID-19 pandemic?
  - *Related evidence-building activity:* Survey higher education institutions and analyze institutional spending from academic year 2018–19 versus academic years 2019–21.

Proposed Focus Area #2: Promoting equity in student access to educational resources, opportunities, and welcoming, safe, and inclusive environments.

Efforts to learn how states, districts, and schools can promote equity can be done by examining and addressing inequities in a broad array of topics, including [school funding](#), [advanced coursework](#), [early learning](#), access to effective and [diverse educators](#), and access to [welcoming, safe, and inclusive environments](#).

*We recommend the Department focus on the following questions and evidence-building activities:*

- Are Black, Native, and Latino students more likely to face disciplinary action?
  - *Related evidence-building activity:* Analyze related Civil Rights Data Collection (CRDC) data disaggregated by racial and ethnic group, gender identity, income level, home language, and ability levels.
- Do underserved students have equitable access to rigorous/advanced coursework?
  - *Related evidence-building activity:* Analyze related CRDC data disaggregated by race and ethnicity, gender identity, income level, home language, and ability levels.
- Do Black, Latino, and Native students have equitable access to school funding?
  - *Related evidence-building activity:* Conduct racial equity-focused analyses of existing school spending/district revenue data.
- How much additional funding should systems provide to support English learners?
  - *Related evidence-building activity:* Cost modeling studies estimating the cost to achieve equal outcomes for English learners.
- What is the composition of school district funding? What share is (a) state support received through the state’s primary funding formula, (b) state support received through grants or other distributions made outside the state’s primary funding formula, (c) local revenues counted toward the state’s primary funding formula calculation, and (d) local revenues retained in addition to the state’s primary funding formula calculation, including the prevalence of private contributions?
  - *Related evidence-building activity:* Collect more detailed data on district revenues aligned with the categories described in (a) - (d) of the question above.
- What are key elements of safe and supportive schools, particularly for students of color, students from low-income backgrounds, English learners, students with disabilities, and students experiencing homelessness?

- *Related evidence-building activity:* Conduct youth participatory research to center the experiences of students and to identify evidence-based prevention and intervention that support underserved students.
- How effective are district wide restorative justice programs? What are the conditions necessary for district-wide restorative justice programs to be implemented well?
- Do students with disabilities, including those in preschool, have equitable access to high-quality learning environments, and does this differ by Individuals with Disabilities in Education Act (IDEA) disability category, age, race and ethnicity, family income level, gender, and/or English learner status?
  - *Related evidence-building activity:* All IDEA data reported to the federal government, including outcome data and placement data, should be disaggregated by race and ethnicity, IDEA disability category, gender, age, and home language
- Is access to federal- and state-funded preschool and early intervention equitable for young children of color, young children from families with low incomes, and dual language learners?
  - *Related evidence-building activity:* Collect data across the mixed delivery system of early care and learning, in partnership with the U.S. Department of Health and Human Services (HHS), on access to high-quality early care and learning and early intervention, disaggregated by race and ethnicity, income level, age, setting, funding stream, disability status, and home language.
- Do schools have culturally and linguistically competent, effective family engagement strategies, and do they implement them effectively?
  - *Related evidence-building activity:* Develop and evaluate measurement tools that meaningfully capture the effectiveness and cultural and linguistic competence of family engagement strategies. Disseminate research findings through the technical assistance system.
- How do changes in policing policy affect students' social, emotional, and academic development?
  - *Related evidence-building activity:* Use states' school climate data and student outcome data (e.g., discipline, academic) to examine impact of policing policies, with comparisons of different policies across states.
- How are anti-“critical race theory” laws impacting the ability of educators to teach with evidence-based practices (e.g., culturally relevant pedagogy)? How are such laws affecting school climate for students of color and for educators of color?

### Proposed Focus Area #3: Meeting student social, emotional, mental health, basic, and academic needs.

As indicated in our [report on social, emotional, and academic development](#), the majority of public schools and districts in the U.S. report they are working to support the social and emotional learning of students, but too often, the approach is to narrowly focus on changing student behavior rather than

implementing practices that build relationships and create learning environments that support positive social and emotional growth. This is especially true in schools and districts that serve large populations of underserved students, including students of color and students from low-income backgrounds.

*We recommend the Department focus on the following questions and evidence-building activities:*

- Do underserved students have equitable access to adequate support staff (e.g., school counselors, mental health providers)?
  - *Related evidence-building activity:* Analyze related CRDC data disaggregated by race and ethnicity, gender identity, income level, home language, and ability levels.
- What is the impact of having a school counselor of color on Black and Latino students' enrollment in rigorous/advanced courses, college aspirations, FAFSA completion, and college enrollment?
  - *Related evidence-building activity:* Analyze student outcome data by race and ethnicity, cross-tabulating with data on access to school counselors.
- Do educators and school staff have access to ongoing, frequent professional development based on evidence-based strategies to address the social and emotional needs of students, including training on multi-tiered systems of support (MTSS), healing-centered engagement, family and student engagement strategies, anti-bias mindsets, restorative justice, empathic discipline, etc.? What is the impact of evidence-based professional development?
  - *Related evidence-building activity:* Survey educators and administrators regarding the supports they provide and receive. Conduct evaluation(s) of professional development activities to examine intermediate and long-term effects on educators' and school staff's abilities to support student social, emotional, and academic development.
- How can school districts include student voice in choosing, implementing, and evaluating practices aimed to improve students' social and emotional well-being?
  - *Related evidence-building activity:* Case studies of districts working to include student voice in efforts to support social and emotional needs of students.

#### Proposed Focus Area #4: Increasing postsecondary education access, affordability, completion, and post-enrollment success.

Students from low-income backgrounds and students of color disproportionately enroll and persist in higher education at lower rates than their peers. Students from low-income backgrounds and students of color face multiple barriers accessing and navigating higher education (including lack of academic counseling, adequate financial support, etc.) that result in lower persistence and graduation rates. To mitigate these barriers, students of color need additional academic, financial, and advising assistance at their respective higher education institutions to reach completion.

*We recommend the Department focus on the following questions and evidence-building activities:*

- Are diploma tracks making it more difficult for students to pursue postsecondary educational opportunities?
  - *Related evidence-building activity:* Analyze alignment between high school graduation requirements and college admission requirements.

- How are students of color and those from low-income backgrounds faring in terms of postsecondary education access, affordability, completion, and post-enrollment success?
  - *Related evidence-building activity:* Disaggregation of Integrated Postsecondary Education Data System (IPEDS) and National Student Loans Data Systems (NSLDS) data by race, ethnicity, and income for student success measures (enrollment, affordability, completion, and post-graduation outcomes).
- What evidence-based practices are best for students of color and those from low-income backgrounds to ensure postsecondary education access, affordability, completion, and post-enrollment success?
  - *Related evidence-building activity:* Analyze existing evidence-based practices by community-based organizations and institutions of higher education increasing postsecondary education access, completion, post-enrollment success for students of color and those from low-income backgrounds, including a particular focus on minority-serving institutions (MSIs).
- How are MSIs faring in terms of providing postsecondary education access, affordability, completion, and post-enrollment success for students of color and those from low-income backgrounds?
  - *Related evidence-building activity:* Analyze student outcomes of Higher Education Act (HEA) Titles III and V program funding (i.e., Title III, Part F; Title V, Part A and Title V, Part B) at MSIs.
- What programs or policies ensure first-generation college students have positive relationships and a sense of belonging, have financial supports to engage in the college community, have academic supports, and have access to career-building opportunities (e.g., internships, etc.)?

### Proposed Focus Area #5: Supporting a well-prepared diverse educator workforce and their professional growth to strengthen student learning.

The need to provide a strong and diverse teacher workforce for all students is as urgent as ever, particularly as school and district leaders are developing plans to address unfinished learning and help students catch up after the disruptions due to COVID-19. A growing body of research shows that having access to teachers of color benefits all students — and [can be particularly transformative for students of color](#). Yet, [only 21% of teachers in the U.S. are teachers of color](#). Moreover, the lack of diversity of the teacher workforce relative to the student population (more than half of all students in the national public school population identify as a person of color) is one of the key drivers of inequity in education, even as states and districts continue to [invest in strategies](#) to increase the racial diversity of their workforces.

*We recommend the Department focus on the following questions and evidence-building activities:*

- What are the long-term student gains in having access to non-novice teachers? How does having a large number of non-novice teachers concentrated in a school affect student outcomes?
  - *Related evidence-building activities:* Analyze student outcomes to examine the impact of non-novice teachers on students. Interview teachers and school leaders in schools with

larger percentages of novice teachers about the impacts of the workforce on student outcomes (e.g., social, emotional, and academic outcomes, etc.).

- What are the long-term student gains in having access to a diverse teaching force?
  - *Related evidence-building activities:* Analyze student outcomes by race and ethnicity using CRDC and state-level data to examine the impact of same-race teacher/student matches and the impact of teachers of color on White students.
- What are the effective strategies that states have taken to recruit and retain teachers of color?
  - *Related evidence-building activities:* Analyze outcomes of existing evidence-based practices carried out by states and districts to recruit, retain, and support a diverse workforce; analyze outcomes of efforts to provide equitable access to non-novice and certified teachers, including the ways that states are tracking progress and reporting data and which strategies are most effective.
- What practices are effective in training teachers to provide culturally sustaining curriculum to students? How is culturally responsive pedagogy used to prepare and support all teachers in their abilities to serve a diverse student population?
  - *Related evidence-building activity:* Conduct longitudinal study on effectiveness of teacher preparation programs on teachers' abilities to use culturally responsive pedagogy to support student social, emotional, and academic development. Identify best practices to apply culturally responsive pedagogy in classroom instruction.
- What is the impact of school leader diversity, experience, and retention on recruiting and retaining teachers of color and teachers serving in high-needs schools?
  - *Related evidence-building activity:* Survey teachers about their experiences with school leaders, including how those experiences inform teachers' decisions about staying or leaving their schools and/or the profession.
- What are the most effective strategies for diversifying the school leader pipeline?
  - *Related evidence-building activity:* Conduct case studies of districts that have a diverse school leader workforce and/or have diversified their school leader workforce over a number of years.
- What are the characteristics of the best teacher preparation program practices for preparing teachers of color to gain their certifications, become successful teachers, and remain in the classroom?

In addition to these specific questions, we encourage the Department to ensure that school leaders are appropriately included in any efforts to examine the educator workforce.

#### Proposed Focus Area #6: Improving Federal student aid programs.

The postsecondary enrollment of students from low-income families and students of color largely depends on their access to federal student aid programs (federal grants, loans, work-study). However,

today, the total amount of outstanding U.S. student debt is about \$1.58 trillion; with roughly 1/8 of the U.S. population having a federal student loan. This issue disproportionately affects students from low-income families and students of color, as these students face stagnant wages and enormous wealth gaps. Furthermore, the purchasing power of the Pell Grant has dropped dramatically since the program's inception. This leaves students with significant amounts of unmet need, often leaving them with no option but to take on large debt burdens to pursue college.

*We recommend the Department focus on the following questions and evidence-building activities:*

- How are students of color faring in terms of college affordability?
  - *Related evidence-building activity:* Disaggregate NSLDS data by race/ethnicity and student default rates, repayment rates, amount of debt, employment, earnings, and earnings-to-debt ratio.

We are happy to respond to any questions that you may have regarding the contents of this letter; please contact Reid Setzer, Director of Government Affairs, at [rsetzer@edtrust.org](mailto:rsetzer@edtrust.org). Thank you for your consideration.

Sincerely,

The Education Trust