

October 15, 2025

Amber Northern
Senior Advisor, Office of the Secretary
U.S. Department of Education
400 Maryland Avenue SW
Washington, DC 20202

Re: Docket ID: ED-2025-IES-0844

Dear Dr. Northern:

The undersigned organizations thank you for the opportunity to share comments as the Department of Education (ED) considers ways to redesign the Institute of Education Sciences (IES). We are hopeful that this effort strengthens the priorities and operations of IES so that it better meets the needs of state and local education leaders, researchers, and the broader community that is dedicated to improving educational outcomes for students.

Our vision for a redesigned IES is an agency that advances educational equity through rigorous, timely, and actionable research. IES should serve as both the nation's trusted source of high-quality data and a driver of innovation that connects research to practice. A modernized IES would strengthen partnerships with states, districts, and institutions; ensure that research reflects the range of student experiences and educational contexts across the country; and make data and evidence more accessible to those closest to teaching and learning.

IES is an important component of this nation's education system. IES provides resources and supports that help states use their limited resources more effectively, by:

- Supporting communities of practice and technical assistance to build research and data capacity
- Compiling, analyzing, and reporting education data and tracking national educational progress
- Funding and disseminating research on what works in education

These functions were spelled out by Congress through the Education Sciences Reform Act of 2002 (ESRA), and over the years, most recently in late 2023, Congress was working in bipartisan fashion to reauthorize ESRA. Given these recent efforts, the Department of Education should work with Congress to change any of the organizational structures and roles/responsibilities of IES set forth in law. Barring that cooperation, nevertheless, the administration must maintain requirements outlined in ESRA.

We appreciate the Department's efforts to seek public input on how it might redesign IES within the context of existing federal statute. Yet, we are discouraged to see that the Department has

allotted fewer than three weeks to allow the public to provide input, which is too short to gather meaningful input from the wide range of constituencies that would be impacted by changes in the way IES operates. We strongly encourage the Department to extend the public comment period through at least October 25, to provide for a 30-day comment period.

As others have noted, outlining what a re-envisioned IES looks like [is an immense challenge](#). It is a challenge that requires people and resources to plan and implement. Current efforts to defund IES — for example, the more than \$500 million cut in the FY26 president's budget request — will undermine these efforts.

Diminishing IES's research and data capacity would leave state and local leaders without the consistent, comparable information they need to make informed decisions and track progress. Federal data systems provide a unique national perspective that individual states and institutions cannot replicate on their own. Sustained investment in IES is essential for maintaining the high-quality evidence base that underpins educational improvement, equity, and the nation's long-term economic competitiveness.

In addition to these overarching recommendations, we offer the following direct feedback regarding the specific priorities highlighted in the request for information (RFI).

Prioritize and streamline federal data collections to balance burden and benefit

Ensure data remains disaggregated: Beyond maintaining existing disaggregation, IES should strengthen the inclusiveness and transparency of its data systems to better capture the intersecting experiences of students across race, gender, income, geography, and other factors. In particular, IES should evaluate areas where it may need to expand data disaggregation and collect additional data on students' intersecting needs, for example, expanding data collection about the experiences of students of color with disabilities. Disaggregation is not only essential for identifying inequities; it is a cornerstone of transparency that allows educators, families, and the public to understand outcomes within their own contexts. Learners across the full spectrum of educational settings benefit when high-quality, disaggregated data inform decision-making, resource allocation, and continuous improvement.

To streamline the federal data collections that IES manages, IES leadership should evaluate IES's data inventory based on statutory requirements and in service of informing how educators support all students, especially the students the Department of Education — in its role as a civil rights agency — were created to serve. ED is responsible for ensuring equal educational opportunity for all students, regardless of race, color, national origin, sex, disability, or age. Ensuring rights of individual groups of students requires collecting data about the experiences, needs and outcomes of students that is disaggregated by those groups. Such disaggregated data is not politically charged, nor does it contradict the executive order to end diversity, equity, and inclusion efforts within the federal government; it is important and actionable information that decision-makers need to get resources and meaningful learning experiences to the students who need it most. For example, principals who have access to disaggregated data

[report that](#) they are more likely to use it to inform planning and student advising than principals who have access to aggregated data.

Ensure high-value data is reported in an efficient and accessible way: Balancing burden and benefit in federal data collection must also include considerations of data accessibility and use, so that data collection efforts maximize the investment that is made. IES leadership could consider expanding several data reporting efforts managed by ED, such as [DataLab](#), which makes sample survey data available — to include the most up-to-date data available for all sample surveys. In addition, IES should consider how to streamline its data reporting infrastructure. For example, by taking efforts to reduce redundancies between the DataLab infrastructure and the infrastructure used to report data from the National Assessment of Educational Progress (NAEP). In addition, IES should modernize the [Digest of Education Statistics](#).

Maintain current features of critical data collections: When evaluating IES’s data inventory as noted above, based on statutory requirements and in service of ensuring that all students receive high quality education opportunities, we strongly urge the Department to maintain the following data collections: the Common Core of Data, the Private School Universe Survey, the Education Demographic and Geographic Estimates, the Civil Rights Data Collected, Integrated Postsecondary Education Data System (IPEDS), College Scorecard, and NCES sample surveys (e.g., NPSAS).

Restore and Strengthen NAEP: We support the administration’s efforts to continue administering the National Assessment of Educational Progress (NAEP), as it is the only nationally representative and continuing assessment of what students know and can do. However, we have concerns about the [future of NAEP](#) given staff reductions at NCES, disruptions with [NAEP contracts](#), and [delays](#) with releasing results. We urge IES to invest resources to ensure that NAEP remains a valid, reliable, and trusted tool to measure student achievement – for all students from every background.

Use transactional FSA data for research and transparency: IES should have full access to transactional record-level data from systems such as the Common Origination and Disbursement (COD) database and the National Student Loan Data System (NSLDS). When appropriately aggregated and protected for privacy, these data can inform research on the reach and effectiveness of federal student aid programs and improve public transparency about who is served and with what outcomes.

Overhaul higher education program data infrastructure: IES should modernize and integrate the Department’s higher education data systems to provide clearer, more [comprehensive information](#) on institutional and student outcomes. A unified infrastructure would help policymakers and the public evaluate performance, identify effective practices, and strengthen incentives for institutions and grantees to improve results.

Leverage its grantmaking to advance impactful, practitioner-relevant research on pressing topics, with specific input on the identification of those topics

Invest more, not less in IES: The federal government can leverage its resources to support innovative research, but that requires investment in the Department of Education — IES must rehire evaluation experts who can manage research grant application processes, especially those who can vet applications for evidence standards to ensure that ED continues to fund high quality research. Rehiring IES research and data experts should be coupled with efforts to automate the bureaucratic, compliance-focused parts of grantmaking so staff can focus more on research quality — disseminating evidence, providing substantive technical assistance to grantees, reviewing grantee performance data, and providing more frequent and responsive feedback to applicants and grantees. Supporting impactful, practitioner-relevant research also requires investing in institutions of higher education and in a strong, diverse pipeline of students who can become the next generation of education researchers and data analysts, both in and outside of academia.

Simplify and increase transparency in grantmaking: To expand the reach and impact of its research programs, IES should simplify grant application processes, improve transparency in funding decisions, and reduce administrative barriers that limit participation by smaller or less-resourced institutions. Competitive opportunities should explicitly encourage partnerships between research-intensive universities and institutions that serve underrepresented or rural populations. Such partnerships can expand innovation capacity across the education sector and ensure that federal investments reflect the full range of expertise and learner experiences found in communities nationwide.

In addition, IES could also identify practitioner-relevant topics and advance impactful, practitioner-relevant grantmaking by:

- Using data from fast-turnaround surveys (e.g., the [School Pulse Panel survey](#)), which can help the Department of Education quickly understand the impact of major disruptions on education or the topics that are of most interest and concern across places, and illuminate emerging issues in public education
- Improving meaningful engagement of diverse stakeholders, including students, educators, families, and community-based advocates — particularly those representing impacted communities, in setting priorities for data, research, evaluation, and technical assistance activities
- Working with Congress to revise the definition of scientifically based research in ESRA to include more theoretical and methodological diverse research to produce more useful and relevant evidence to improve practices and outcomes

Improve the reach and utility of evidence dissemination

To improve the reach and utility of evidence dissemination, IES should improve the accessibility, timeliness, and visibility of research that it supports or conducts. Specifically, IES should ensure that the research it funds is communicated in formats that are clear, concise, and actionable for

practitioners and decision-makers. Studies should include summaries and implementation guidance that translate technical findings into practical steps educators and policymakers can use. Strengthening the link between research production and real-world application will make federal investments more effective and help evidence reach classrooms, campuses, and communities where it can drive change. For example, IES can:

- Invest more in strategic communications capacity and set communications goals for the data, research, and evaluation reports that it publishes that are strategic, measurable, ambitious, realistic, time-bound, and incorporate equity and inclusion
- Encourage research grantees to publish findings in the journals that practitioners read (e.g., *District Administration*)
- Encourage research/policy advocacy partnerships that intentionally pair academic research entities with organizations that are skilled in policy advocacy and communications, to develop and widely disseminate research findings
- Maintain and improve the utility of the What Works Clearinghouse (WWC) and other research dissemination tools (such as the Education Resources Information Center), based on feedback from users

In addition to these recommendations, we note that the ALI Task Force Brief: [Inclusive Education R&D](#) includes recommendations to prioritize knowledge mobilization and engagement, which we fully support.

Support states and districts through more responsive technical assistance and capacity building, including building states' capacity for using evidence and creating a culture of continuous improvement

Restore, strengthen, and encourage use of existing technical assistance structures: ED has existing technical assistance mechanisms that should be restored and strengthened to support state and district leaders' needs. Regional Education Laboratories (RELs), Comprehensive Centers, and Equity Assistance Centers all work directly with state and local education leaders and educators to support policy and practice improvement. Technical assistance should not only provide guidance but also foster collaboration among states, districts, and institutions engaged in shared research and improvement efforts. Embedding opportunities for practitioners to co-develop questions, interpret findings, and test solutions will help states build enduring capacity for using evidence in context and strengthen a culture of continuous improvement.

A revised scope of work for this group of technical assistance providers could include advising states on public performance management across the functional areas of IES (data collection, analysis, and reporting; evaluation; research; dissemination; technical assistance; etc.). In concert with this recommendation, we note that the ALI Task Force Brief: [Inclusive Education R&D](#) includes recommendations to invest in high-quality collaborative education R&D efforts centered at the state and local levels.

Provide funding to enhance statewide longitudinal data systems: State and local leaders need real-time data to engage in continuous improvement. Statewide longitudinal data systems can enable state and local leaders to make data-driven decisions. One focus of a redesigned IES should be to seek large federal investments from Congress to equip states with the resources needed to create next-generation statewide longitudinal data systems that include linkages of P-20 student data to workforce data and include other government sectors, which are responsibly powered by artificial intelligence.

In closing, we appreciate the opportunity to share comments and recommendations regarding the Department's goals to redesign IES. Together, these recommendations envision an IES that produces knowledge; drives improvement; and makes evidence accessible, actionable, and relevant for every learner and community. We are happy to respond to any questions that you may have about this letter's contents. Please contact [Reid Setzer, director of government affairs](#) with questions.

Thank you for your consideration.

Sincerely,

Advance Illinois

All4Ed

Applied Learning Insights LLC

Calculus Roundtable

EdTrust

Education Reform Now

Educators for Excellence

InnovateEDU

National Parents Union

The Century Foundation

The Study Group

UnidosUS