

April 2, 2026

The Honorable Kirsten Baesler  
Assistant Secretary for Elementary and Secondary Education  
U.S. Department of Education  
400 Maryland Avenue, SW  
Washington, D.C. 20202

Re: ED-2026-OESE-0364: Comprehensive Centers Program

Dear Assistant Secretary Baesler,

EdTrust, a national nonprofit organization that advocates for education policies that work to address longstanding inequities, particularly for students of color and students from low-income backgrounds, respectfully submits the following comments in response to the Department of Education's (the Department) notice inviting public comment on the structure and priorities of the Comprehensive Centers (comp centers) program. We appreciate the opportunity to weigh in on a program that plays a critical role in building the capacity of state educational agencies (SEAs) and local educational agencies (LEAs) to improve outcomes for all students, particularly those in the lowest-performing schools.

#### *Regional Center Structure and Coverage*

The notice raises questions about how to determine the appropriate number and coverage of regional centers. Rather than prescribing a specific number, we urge the Department to prioritize consistency in regional coverage over time. State and district staff benefit enormously from stable, ongoing relationships with their regional center partners — relationships that allow centers to develop deep familiarity with state context, policy landscapes, and local capacity needs. Frequent restructuring, or uneven coverage, undermines that continuity. Whatever configuration of regional centers is ultimately selected, we strongly encourage the Department to commit to maintaining that structure across grant cycles to provide reliable, equitable access to support for all states and districts.

#### *Relationship Between Comprehensive Centers and Regional Educational Laboratories*

We welcome the Department's acknowledgement that it is considering a comprehensive review of how comp centers and Regional Educational Laboratories (RELs) are structured, and urge the Department to pursue it seriously. As documented in [Reimagining the Institute of Education Sciences: A Strategy for Relevance and Renewal](#), what was intended as a beneficial overlap between the two programs has in practice produced turf wars and mission creep. The consequences fall on states and districts, who frequently don't know which entity is better positioned to meet their needs, and who may receive inconsistent support as a result.

The report recommends clarifying the distinct roles of each program, synchronizing their award cycles, and exploring a coordinated structure that could bring greater coherence to the federal

research and technical assistance ecosystem. We urge the Department to use this review as a genuine opportunity to address these structural problems, while ensuring the unique but complementary missions of each program to provide improved supports for state and district leaders.

### *Content Centers: Strong Support for Literacy, with Important Caveats*

We strongly support the creation of a dedicated content center focused on literacy for students with disabilities. This population has long been underserved by both literacy research and implementation support, and a targeted center is an appropriate and necessary investment.

At the same time, we encourage the Department to think more expansively about literacy support through the comp centers themselves. Many states have now enacted comprehensive literacy policies, and the pressing need is not just policy development but also the implementation capacity to carry those policies out effectively — particularly in high-need schools and districts. We urge the Department to direct regional comp centers to prioritize literacy implementation support as a core function, in alignment with the administration's own supplemental priority on literacy.

### *Concerns Regarding the Use of Supplemental Priorities to Drive Content Center Selection*

The notice indicates that administration supplemental priorities will partially drive the selection of field-initiated and "emerging priority" content centers. With the exception of the Department's priority on literacy noted above, we have significant concerns about this approach and urge the Department to ensure that content center selection is driven by evidence of need and demonstrated gaps in state and district capacity — not by political priorities. Three current supplemental priorities are particularly problematic:

### **Returning Education to the States**

While states play an important role in education governance, the administration's approach risks weakening the federal civil rights enforcement and accountability measures that protect student rights. Comp centers exist to build state and district capacity in service of our shared obligation to all students — not to facilitate a retreat from federal equity commitments. Any comp center work shaped by this priority must ensure continued compliance with federal law, including essential civil rights protections.

### **Educational Choice**

Public dollars should be invested in public schools, which serve over 90% of America's students and cannot discriminate in admissions. Directing comp center technical assistance toward private school choice would divert the program away from the students and institutions it was designed to serve — particularly students with disabilities, rural students, and students from low-income families, for whom voucher programs consistently fail to deliver meaningful options or stronger academic outcomes. This loss of technical assistance, resources, and capacity for our nation's public schools is unacceptable.

## **Patriotic Education**

The administration's approach to this priority represents a top-down, politically motivated effort to define curriculum content in ways that conflict with the General Education Provisions Act, which explicitly prohibits federal direction or control over curriculum and instruction. This effort also actively conflicts with the administration's own goals of returning education to the states. The organizations elevated to lead this work are not experts in history or education — they are politically aligned organizations whose version of history education marginalizes the experiences of Black, Latino, LGBTQ+, and Native American students, as well as students with disabilities. Directing comp center resources toward this priority would actively harm students and undermine the program's credibility.

The Comprehensive Centers program has a proud history of providing nonpartisan, research-grounded technical assistance. We urge the Department to preserve that character by ensuring priorities are determined by evidence of need — above all, the urgent need to improve outcomes for students who have been most underserved.

### *School Improvement as a Central Focus*

Supporting states and districts in their school improvement work must remain a central mission of the comp centers program. The need is urgent and the equity stakes are high. According to a new Government Accountability Office (GAO) [report](#), the share of schools identified for comprehensive support and improvement grew by more than 1,200 schools nationwide — and those schools have become more academically challenged and economically disadvantaged over time. Schools with higher percentages of students from low-income backgrounds were significantly less likely to exit improvement status, a stark illustration of the compounding inequities at play — ones rooted not in any failure of students, but in centuries of chronic disinvestment.

The GAO report also identifies the strategies most associated with successfully exiting comprehensive support and improvement (CSI) status — building buy-in, changing school culture, fostering collaboration, using data, targeting professional development, and sustaining improvements — with effective leadership identified as critical to all of them. These are precisely the capacity-building strategies comp centers are positioned to support. Yet EdTrust's [recent research](#) finds that SEAs continue to face significant capacity constraints in leading this work, with data-informed decision-making and continuous improvement practices remaining nascent in many agencies.

We urge the Department to make supporting SEA and LEA school improvement capacity an explicit priority for regional centers — helping states build the leadership, data systems, and implementation infrastructure needed to deliver meaningful support to identified schools.

### *Addressing Resource Inequities*

Finally, we urge the Department to direct comp centers to support states and districts in identifying and addressing resource inequities that undermine educational opportunity. As

research consistently demonstrates — including work from [American Institutes for Research](#) and [All4Ed](#) — federal resources alone are insufficient to meet the needs of the lowest-performing schools, and many states' own funding systems exacerbate rather than remedy underlying inequities. Comp centers should be equipped and expected to help state and district partners diagnose these inequities and develop actionable strategies to address them. Technical assistance that ignores the resource context in which schools and districts operate will always fall short. Equity-centered capacity building must account for whether schools have the resources they actually need to improve.

The Comprehensive Centers program represents a vital federal investment in the infrastructure of educational improvement. We urge the Department to preserve and strengthen that investment by maintaining stable regional coverage, clarifying the relationship between comp centers and RELs, centering literacy implementation and school improvement as core priorities, and ensuring that content center selection is driven by evidence rather than political priorities. We stand ready to provide additional information or support as the Department moves forward with this work.

Sincerely,

Calculus Roundtable  
EdTrust  
Educators for Excellence  
Families in Schools (FIS)  
National Parents Union