

#### Society for Research on Educational Effectiveness Advancing Education Research

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Public Comment on Institute of Education Science Modernization Submitted in Response to Department of Education Request for Information (Docket ID: ED-2025-IES-0844) October 15, 2025

The Society for Research on Educational Effectiveness (SREE) appreciates the opportunity to comment on the *Institute of Education Sciences' Request for Information* (RFI) on the future of IES.<sup>1</sup> Founded in 2008, SREE is a professional association committed to generating, synthesizing, and applying reliable evidence of program and policy effectiveness in education. This includes advocating for the development and use of rigorous causal methods to determine not only what works but also for whom and under what conditions. Our membership includes researchers, practitioners, and policymakers from school systems, research firms, universities, and government agencies who share a commitment to credible, transparent, and policy-relevant evidence.

SREE recognizes the substantial and important groundwork laid by IES over the past 20-plus years in advancing rigorous education research and strongly supports the continued funding of this research infrastructure, as authorized by Congress. Of particular importance to SREE, in addition to the collection of national data in NCES, this includes continued funding at NCER and NCSER for research developing and testing new interventions, the development of methods for supporting rigorous research, and programs focused on increasing the number and capacity of researchers to conduct this rigorous research; and at NCEE for evaluations of federal programs and for the dissemination of evidence to states, districts, and schools. It is through this continued funding and running of these programs that the US can continue to be a world leader in education research and evaluation.

Building on this foundation, we see an opportunity to strengthen the nation's evidence infrastructure and to ensure that education research remains consistently rigorous, relevant, and usable across states and contexts. We therefore offer the following guiding principles and recommendations to help IES achieve these goals.

- 1. Maintain and advance evidence standards. As an organization, SREE wholeheartedly endorses the existence of federal standards for quality research. We want to ensure that clear and evolving methodological standards remain central to all education research, evaluation, and dissemination activities. IES should provide such standards to support the states, instead of having them each develop their own separate standards.
- **2.** Examine mechanisms and differences in effects across contexts. In addition to using evaluation to identify effective and scalable interventions, it is also critical to support evaluations that investigate how and why interventions produce different effects across contexts, populations, and implementation conditions.

<sup>&</sup>lt;sup>1</sup> Society for Research on Educational Effectiveness. <a href="https://www.sree.org/">https://www.sree.org/</a>
Request for Information: Feedback on Redesigning the Institute of Education Sciences <a href="https://public-inspection.federalregister.gov/2025-18608.pdf">https://public-inspection.federalregister.gov/2025-18608.pdf</a>

- **3.** Invest in shared research infrastructure. The development of blueprints and digital and analog platforms to support coordinated and scalable education research is essential. Examples such as SEERNet and BIRD-E provide strong models that can be expanded beyond educational technology.
- **4.** Promote sustained researcher-practitioner collaboration throughout the research cycle. Having researcher-practitioner partnerships to co-design studies that address state and local priorities, co-interpret evidence, and applying findings in policy and practice would build analytic capacity at the state and local levels.
- **5.** Balance scientific rigor with policy relevance and timeliness. IES needs to modernize processes so that credible evidence is easily obtained when needed and also is useful for policymakers and educators. We need modern review and dissemination processes so that high-quality studies can inform urgent policy and practice decisions.

We next address the specific questions put forth by IES in turn.

Response to Specific Requests for How IES Can:

1. Function more cohesively across its four centers to ensure shared goals drive data collection, research funding, and technical assistance.

We offer four suggestions. First, IES should establish cross-center initiatives organized around shared research priorities. Each initiative could define common data elements, measures, and design principles to ensure that administrative and survey data collected by NCES can directly inform impact evaluations conducted by NCER and NCSER, and that NCEE's evaluation and synthesis work draws systematically on those same data sources. For example, a cross-center initiative on early literacy could align NCES data collection on reading assessments, NCER/NCSER-funded intervention studies, and NCEE synthesis work through shared outcome definitions and population descriptors. Cross-center initiatives would reduce siloization within education research and allow innovations to more quickly spread across subfields.

Second, IES should require shared data standards and metadata practices to strengthen this alignment, particularly between NCES and NCEE. Many important outcomes and contextual factors about schools (e.g., curriculum use) collected during evaluations are not also collected at scale (i.e., via NCES), making it difficult to understand the extent to which findings from one evaluation may apply to other states and locales. NCES could play a role in defining interoperable variables and measures to facilitate linkage between descriptive data and data collected in evaluations. Similarly, NCEE could make its public-use datasets and WWC-reviewed studies more easily linkable to NCES data, supporting meta-analyses and secondary analyses across the portfolio.

Third, IES should also encourage stronger integration across its centers and labs, ensuring that RELs and R&D Centers both draw on and inform the work of the WWC, NCER, and NCSER. Technical assistance activities should reflect the most rigorous and up-to-date evidence while also identifying emergent needs and practice-based insights that can inform future research priorities.

Finally, coordination should also extend beyond IES itself. The Comprehensive Centers (CCs), administered by the Office of Elementary and Secondary Education (OESE), play a complementary role by helping states implement and scale evidence-based practices. RELs

and CCs are intended to be complementary, where RELs generate/translate evidence; CCs build regional, state, school, and local capacity to apply it. More generally, the postsecondary and secondary offices of the Department of Education use IES advice and standards to select programs to fund. In practice, however, these networks often operate separately. Establishing formal mechanisms for coordination between RELs and Comprehensive Centers, such as joint planning, co-authored dissemination products, or shared technical assistance priorities, would make federal dissemination and capacity-building investments mutually reinforcing rather than duplicative.

# 2. Better <u>meet the needs</u> of state and local leaders, educators, parents, researchers, and state education agencies.

Meeting the needs of state and local leaders requires building and sustaining strong communication channels and genuine partnerships throughout the entire research process. To that end, we offer four recommendations.

First, IES should strengthen this connection by requiring systematic needs assessments to identify the most pressing policy- and practice-relevant questions facing the field. IES should engage in comprehensive and regular needs assessments that allow them to identify priorities for funding and that incorporate input from policymakers and practitioners (NASEM, 2022, Recommendation 5.5). This can also be done by supporting *Discovery and Needs Assessment* research via grants within NCER and NCSER (NASEM, 2022, Recommendation 4.1), by establishing advisory panels with diverse perspectives, and by appointing a range of practitioner, policy, and scientific leaders to the NBES.

Second, IES should continue to invest in funding mechanisms that formalize and sustain research–practice partnerships, including competitions that require collaboration and flexibility to respond to evolving local needs. For example, the *Evaluation of North Carolina's Career and College Promise Dual Enrollment* program illustrates how strong state-research partnerships can generate timely, practitioner driven evidence to inform policy decisions.<sup>2</sup> IES could advance this goal by: a) funding competitions that require practitioner engagement throughout the project, including from co-developing research questions to analyzing implementation challenges, b) requiring grantees to submit formal partnership engagement plans (NASEM, 2022, Recommendation 8.3), and c) by ensuring that practitioner and policy-maker perspectives are represented in review panels (NASEM, 2022, Recommendation 8.4).

Third, at the same time, IES should advance a conception of rigor that integrates causal inference with systematic attention to implementation, heterogeneity, and scalability. Interventions should be designed and tested with eventual practical use in mind; programs that cannot be realistically implemented or sustained at scale should not advance to large-scale evaluation. Descriptive evidence about local contexts, implementation conditions, and populations should be treated as essential because it allows policymakers to understand the context in which interventions are implemented, formulate hypotheses about why effects vary, anticipate implementation challenges, and make informed decisions about scaling or adaptation (NASEM, 2022, Recommendation 6.3).

Fourth, researchers need continued support to serve as "honest brokers" of evidence. To

<sup>&</sup>lt;sup>2</sup> Evaluation of NC's Career and College Promise Dual Enrollment study details: earlycollegeresearch.uncg.edu/publications-dual-enrollment

preserve trust and independence, researchers must have the ability to work without undue influence and to report results transparently and accurately, including null or unfavorable findings, without fear of losing access to data or partnerships. Reinforcing shared evidence standards through the WWC and related platforms can help ensure that researchers, policymakers, and vendors use a common framework for evaluating and applying evidence.

Finally, we recognize that there are current proposals to shift research funds directly to states. While this approach could help states address their specific priorities, SREE has concerns that it may also lead to a more fragmented and less efficient national research agenda. The federal government plays several critical roles that individual states cannot readily assume. First, it provides the infrastructure for collecting and sharing key national data (e.g., through NCES and SLDS) that allow us to assess whether students across the country are meeting essential learning goals. Second, it facilitates coordination among researchers and decision-makers across states, an especially important function given that multiple states often confront similar educational challenges. Third, federal leadership is essential for disseminating evidence broadly, since individual states have limited incentives or capacity to share what they have learned. Finally, many states currently lack the infrastructure and research capacity to manage rigorous education research portfolios (NASEM, 2022; Hamilton et al., 2019). For these reasons, maintaining a strong federal role in setting priorities, funding research, and building state capacity is essential to sustain a coherent and effective national evidence system.

# 3. Improve the <u>timeliness</u>, <u>accuracy</u>, <u>and accessibility</u> of its statistics and research products.

While IES has a variety of research products, our focus here is on the timeliness, accuracy, and accessibility of products from NCEE. Here we offer two recommendations.

First, IES should modernize how evidence is synthesized and shared. As the 2025 Report *Harnessing Innovation: Implementing Living Reviews at IES* by the Federation of American Scientists (Anderson, Mohsin, & Schoeffel, 2025) argues, the WWC could expand upon static reports to also do living reviews that are updated as new studies are released. This approach would make evidence reviews more responsive to new findings while retaining methodological oversight. This also would allow IES to focus its review and synthesis efforts on the most common and recurring problems of practice (e.g. areas where new findings are most likely to inform policy and program decisions).

Second, IES should invest in knowledge mobilization and dissemination, as these could improve the WWC's accessibility and usefulness, ensuring that evidence is presented in formats that support understanding and use by educators, policymakers, and families. This work should draw from research on science communication and implementation – fields that examine how information is interpreted and applied, not just accessed or visualized. Within this broader agenda, IES could also convene a *User Experience Technical Working Group*, akin to the *Statistical Methods Working Group* that is typically part of the WWC contract. This advisory group could be composed of experts in Human Computer Interaction, Human Centered Design, and User Experience research. Additional approaches could include grants (e.g. knowledge mobilization grant within NCER; see NASEM Report, Recommendation 6.1) or contracts to study how users interact with the WWC (e.g. via interviews, eye tracking). Reviving efforts like the former SWEEP contract, which aimed to improve evidence dissemination and usability, could also serve as a starting point for this work.

#### 4. Maximize the utility of federal and other education program evaluations.

The utility of IES-funded evaluations depends on whether they produce evidence on interventions that are feasible to implement, and whether this evidence informs where and for whom the identified intervention might reliably work. Here we offer four recommendations to increase this utility.

First, IES should strengthen the practical value of its research by ensuring that the interventions that are developed (via *Development* grants at NCER and NCSER) are feasible to implement. This puts a primacy on ensuring that interventions can be implemented in the range of contexts and schools in which they will likely be used, and that, if found effective, they are affordable and likely to be selected for use. The IES *Guide on Conducting Implementation Research* (Hill, Scher, Haimson, & Granito, 2023) and *Cost Analysis Standards* (2021) provide existing frameworks for studying this. Embedding implementation and cost studies systematically across the development and evaluation portfolio would make results more useful to state and local decision-makers, who must weigh both effectiveness and feasibility when deciding whether to adopt or scale programs.

Second, IES should support evaluations that move beyond average effects to examine for whom and under what conditions interventions work. Consistent with the NASEM report (2022; see Chapter 4), evaluations should plan for heterogeneity at the outset—pre-specifying subgroups and moderators, powering analyses to detect meaningful differences, and employing common measures that enable cross-study comparison—rather than treating it as a post hoc exercise. IES has already produced strong guidance in this area (e.g., the NCEE commissioned *Guide on Generalizability*; Tipton & Olsen, 2022) and should implement these recommendations consistently across its evaluation portfolio at NCEE, NCER, and NCSER.

Evaluation work should be done as part of a coordinated effort across states that share common measures, data elements, and aligned designs. Such coordination would allow findings to be synthesized across sites while capturing the variation needed to understand heterogeneity of effects. Models for this already exist, including the *National Institutes of Health*, which funds multi-site clinical trials designed to test both pooled and site-specific effects, and the *Education Endowment Foundation* (EEF) in the United Kingdom, which conducts coordinated replications to examine whether programs produce consistent results across schools. Within education in the US, efforts such as the *Special Education Research Accelerator* (SERA) demonstrate the feasibility of coordinated multi-site field trials under shared protocols, while initiatives like the *BIRD-E* framework for standardized data practices and *SEERNet* for embedded experimentation show how digital and analog infrastructures can support cumulative, policy-relevant research.<sup>3</sup> IES could use its R&D Centers to anchor and manage these networks, ensuring methodological consistency and data interoperability across studies.

Finally, there is the question of immediate need – how IES can help decision-makers better make sense of the existing evidence already encoded in the WWC. Decision-makers often want to know not simply if an intervention "works" on average, but if it will work in their particular school or context. Despite substantial federal investment, the existing evidence base remains too limited to fully support nuanced comparisons by intervention type, setting, or student

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<sup>&</sup>lt;sup>3</sup> Education Endowment Foundation (EEF): <a href="https://educationendowmentfoundation.org.uk/">https://educationendowmentfoundation.org.uk/</a>
Special Education Research Accelerator (SERA): <a href="https://edresearchaccelerator.org/">https://edresearchaccelerator.org/</a>
Blueprint for Inclusive Research and Development in Education (BIRD-E): <a href="https://www.bird-e.org/">https://www.bird-e.org/</a>
The SEER Research Network for Digital Learning Platforms: <a href="https://ies.ed.gov/use-work/awards/seer-research-network-digital-learning-platforms?ID=4703">https://ies.ed.gov/use-work/awards/seer-research-network-digital-learning-platforms?ID=4703</a>

population within the WWC. For example, if a decision-maker were to filter evidence by one or two variables (e.g., urbanicity), there would likely be no studies that met their criteria. IES could address this by investing in methodological and computational innovations, such as research design, statistical techniques, and machine learning approaches that enable the prediction of intervention effects in schools and districts outside of those included in a study sample. The application of these methods would then need to be piloted, validated in a variety of ways through user experience studies, and ultimately implemented in the WWC.

### 5. Strengthen partnerships with other federal agencies and between <u>state agencies</u> to align data and <u>reduce redundancy</u>.

States currently vary widely in data quality, analytic capacity, and interpretations of federal privacy laws, making it difficult for researchers and policymakers to conduct and use research across jurisdictions. Even within states, cross-sector data linkages (e.g. connecting education records to labor force participation, health outcomes, or social service use) remain rare. These challenges limit the ability to assess how education programs affect later-life outcomes. Here we offer three recommendations.

First, IES should work with other appropriate federal agencies to support the development of clear and consistent guidance on interpreting the Family Educational Rights and Privacy Act (FERPA) for research and evidence-building activities, and to promote model data-sharing agreements that reduce uncertainty for entities that create, use, or share education records, including state and local education agencies, institutions of higher education, and research organizations. IES could play a convening role focused on drawing on efforts such as the Data Quality Campaign's recommendations to align federal, state, and local interpretation of FERPA while helping states build the technical capacity to manage and link data securely.

Second, to promote comparability and cumulative knowledge, IES could also fund cross-state evaluation networks that use shared data elements, common outcome measures, and aligned designs. Models already exist: *CALDER* links administrative data across multiple states to study teacher and school reforms, while the *Statewide Longitudinal Data Systems* (SLDS) offer a platform for multi-state research with consistent data definitions. Building on these, IES could foster a networked infrastructure for coordinated evaluations, anchored through its R&D Centers, to facilitate replication, meta-analysis, and long-term follow-up of promising interventions or policies.

Third, cross-sector linkages would further enhance the national evidence base. Partnering with agencies such as the Departments of Labor, Health and Human Services, and Commerce would enable connections between education data and workforce, health, and demographic records. Successful precedents include the *Post-Secondary Employment Outcomes* (PSEO) project at the Census Bureau, which links education and earnings data for longitudinal analysis; *Opportunity Insights*, which integrates IRS, Census, and education data to study mobility; and the *National Secure Data Service* (NSDS) pilot, authorized by the CHIPS and Science Act, which aims to streamline interagency data access for evidence-building. IES can play a central role in aligning such initiatives with its research and evaluation agenda. Access to such data

https://lehd.ces.census.gov/data/pseo\_experimental.html

Opportunity Insights: https://opportunityinsights.org/

National Secure Data Service (NSDS): https://ncses.nsf.gov/initiatives/national-secure-data-service-demo

<sup>&</sup>lt;sup>4</sup> Post-Secondary Employment Outcomes (PSEO):

must be governed by robust privacy measures and restricted solely to public-good research.

## 6. Improve mechanisms for <u>disseminating</u> and <u>scaling</u> evidence-based practices, including the work of the <u>RELs, WWC, and R&D Centers.</u>

For IES, "dissemination and scaling" necessarily operates on two levels: the dissemination of substantive findings about interventions and practices to decision-makers, *and* the dissemination of the research methods, measures, and tools to researchers that make those findings credible, replicable, generalizable, and interpretable. While both are essential for a functioning national evidence infrastructure, given the mission of SREE, our focus here is on the latter. Here we offer four recommendations.

First, IES should create a methods clearinghouse or repository to improve the dissemination of the methods, measures, and analytic tools needed to support rigorous research in education. IES could establish and maintain an open repository of validated instruments, researcher-developed surveys, statistical packages (e.g., R or Stata code), and online tools that support reproducibility and high-quality analysis. This "methods clearinghouse" could function as a companion to the WWC but focused on the infrastructure of credible research rather than intervention outcomes. Sustaining such tools requires dedicated funding for versioning, documentation, and user support, and IES could create a small-grants mechanism for the ongoing maintenance of included tools.

Second, IES should sustain and expand methods training programs. IES's Methods Training Grants provide opportunities for existing researchers in the field to continue to learn about, and ultimately use, state-of-the-art statistical and computational methods in their research. Through these workshops, the field has learned a variety of new methods and research designs that would not be possible otherwise; often, they take this training back to their universities and teach courses to the next generation of scholars.

Third, IES should sustain and expand education research training programs. IES's Research Training Program in the Education Sciences has been a vital mechanism for transformation in the field of education research over the past 20 years. It was via this program that an entire new field of researchers – trained in rigorous causal evidence – was developed, with many of those from the first cohorts just now reaching senior leadership positions in the field. Continuing and expanding these training programs – particularly in states and institutions with limited research infrastructure – will help ensure that all states have researchers with the ability to produce and interpret rigorous evidence.

Fourth, dissemination should not only communicate findings but also build on and contribute to knowledge about how evidence is used in practice. IES should advance the science of evidence around translating, disseminating and using research evidence by supporting research that investigates how evidence is accessed, interpreted, and applied across policy and practice communities. This includes understanding what kinds of evidence different users need and what supports them in applying that evidence in practice. The NASEM (2022; Recommendation 4.1) report refers to this as research on *knowledge mobilization* and suggests it be funded through grants within NCER and NCSER. Additionally, RELs, R&D Centers, and Comprehensive Centers are ideal laboratories for this work, allowing IES to test and refine dissemination strategies in real-world settings. Clarifying whether the WWC's primary audience is local practitioners, intermediary organizations, or policymakers would also help target dissemination investments more effectively. The essential point here is for this work not to be one-offs, but instead to be studied and shared in ways that others can learn from and apply to their work as

well.

### 7. Modernize its <u>peer review</u>, grantmaking, and contracting processes to encourage <u>innovation</u> while maintaining rigor.

We offer two recommendations regarding improving peer review for grant making.

First, increasing the frequency and flexibility of funding cycles would make IES more responsive to emerging needs and encourage innovation. Running more frequent funding cycles per year would allow promising ideas to move more quickly from concept to implementation. In addition, IES could create multiple funding mechanisms, including smaller and shorter-duration awards, to test high-potential ideas or pilot methods before larger-scale evaluations (NASEM, 2022, Recommendation 8.2).

Second, IES should refine its peer review process to ensure that practical importance and potential for use and impact are weighed appropriately alongside methodological rigor. Current scoring systems tend to privilege technical design quality over considerations of need, feasibility, and potential for broad use. As the NASEM report observed (2022, Ch. 8), this approach can lead to a "2.0 cut point problem," where strong but narrow studies are favored over projects with high significance but tractable design limitations. To address this, IES could explore a two-stage review process similar to the Education Innovation and Research (EIR) program, in which proposals are first screened for significance and potential contribution to policy or practice, and only then evaluated for methodological rigor.

Review processes could also include structured opportunities for methodological revision when significance is strong, allowing promising but imperfect proposals to be improved rather than rejected outright. Finally, providing Program Officers with limited discretionary authority – similar to other federal science agencies, such as the National Science Foundation – would enable IES to fund high-need or high-opportunity projects that may not rise to the top under strict scoring formulas.

#### Summary

In closing, we want to reflect on the enormity of what IES has accomplished in the last 20 years. In this short time, IES has developed a strong evidence base of rigorous causal studies – over 400 efficacy and effectiveness trials to date, in addition to many hundreds of strong quasi-experiments – and, to do so, has trained an entire new generation of scholars, as well as building the expertise of existing scholars, to take on this work. These studies were built upon the foundation of even more studies, also funded by the IES, in which interventions were developed, and other studies developing new measures, new research designs, and new statistical methods for analysis. Moving forward, it is our hope that IES will take this opportunity to build upon – not replace – its prior mission, to hold steady in its focus on rigor and evidence, while forging a new path forward that involves greater collaboration and partnership with states and decision-makers.

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