October 15, 2025

Matthew Soldner
U.S. Department of Education
400 Maryland Avenue SW, Room 2C172
Washington, DC 20202

RE: Comments to the Department of Education on the request for information (RFI) on redesigning the Institute of Education Sciences [ED-2025-18608]

Dear Acting Director Soldner,

On behalf of the New America Education Policy Program, we appreciate the opportunity to respond to this request for information (RFI) on redesigning the Institute of Education Sciences (IES), ED-2025-18608. Our work spans the full education and work continuum, from early childhood through K–12, postsecondary, and workforce policy, and we have long advocated for stronger data systems, rigorous evaluation, and evidence-informed decision-making. In this response, we aim not only to propose future directions, but also to situate them in the historical legacy and statutory foundations of IES and its predecessors.

The need for a strong, independent, and well-resourced IES has never been greater. Recent disruptions to federal education research functions have highlighted both the vulnerabilities and the indispensable nature of IES. Now is the time to reimagine the Institute to ensure continuity, strengthen equity, and expand its reach across the education-to-workforce spectrum.

We look forward to continuing to engage the Department on ways to strengthen education across the country. By drawing on the robust data infrastructure and research expertise of IES, the Department can make evidence-based policy decisions that improve outcomes for students, families, institutions, and communities nationwide.

Sincerely,

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History of IES and Federal Education Data

The United States' federal efforts to collect, analyze, and interpret education data stretch back to the 19th century. The Office of Education — created in 1867 — began compiling national statistics on enrollment, literacy, and school conditions, thus planting the seeds of what would evolve into our modern education data infrastructure. Over subsequent decades, the federal role in education research and measurement evolved through a series of institutional transformations, including the establishment of the National Institute of Education (NIE) in 1972 and its later reorganization into the Office of Educational Research and Improvement (OERI) in 1985.[1]

Yet these earlier agencies often lacked the independence, scientific rigor, or stable funding needed to sustain large-scale, long-term, and comparable educational studies across states and populations. Recognizing that structural weakness, in 2002, Congress passed the Education Sciences Reform Act and established the Institute of Education Sciences. IES replaced the Office of Educational Research and Improvement with a more independent, scientifically grounded structure composed of four national centers: the National Center for Education Research (NCER), the National Center for Education Statistics (NCES), the National Center for Education Evaluation and Regional Assistance (NCEE), and the National Center for Special Education Research (NCSER). The law also created the National Board for Education Sciences (NBES) to provide strategic guidance.

At its founding, the IES Director (appointed by the President with Senate confirmation for a six-year term) was charged with stewarding rigorous, objective education research free of political bias—and ensuring that IES operations would adhere to scientifically valid methods.

Grover "Russ" Whitehurst, the first director, famously framed IES as a vehicle to "institutionalize science in education," shifting federal education policy toward systematic, replicable research rather than ideology or anecdote. While that phrase is widely cited in the field, scholars, and observers have pointed out that the vision was to raise the standards of education research—introducing procedural rigor akin to the models found in the hard sciences reflected in the National Science Foundation (NSF) or the National Institutes of Health (NIH).

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[1] https://www.congress.gov/crs-product/R47481

From its early years, IES took on large national assessments and longitudinal studies, commissioning the National Assessment of Educational Progress (NAEP) under the auspices of NCES (authorized under related statute) and driving forward long-term follow-ups of student cohorts. Over time, IES's role expanded to include large-scale program evaluations, technical assistance, and publication of evidence-based practice guides via the What Works Clearinghouse.

The importance of IES is not merely historical but structural: it provides a stable institutional anchor for national education research. Without it, states and institutions would struggle to coordinate definitions, maintain consistent instrumentation, ensure comparability of measures, or sustain long-term trend monitoring. As one critic put it, IES is "where we learn what is and isn't functioning—and what might work better."

In an era of rapid change—technological disruption, evolving credential landscapes, shifts in workforce demands, and widening equity gaps—the existence of a strong, central evidence engine is more critical than ever. Even more so, this is important as we improve our understanding of the effects of the COVID-19 pandemic on our students' learning and development. A redesigned IES must build on that legacy rather than discard it.

Why a Redesigned IES Matters Now

In 2025, sweeping contract cancellations and proposed cuts to IES functions revealed how fragile this infrastructure can be. Among the most consequential was the Department's attempt to terminate remote access to restricted-use NCES data, which would have cut off researchers from vital information on student outcomes. In response, the Institute for Higher Education Policy (IHEP) and the Association for Education Finance and Policy (AEFP) filed suit, arguing that dismantling IES's functions violated statutory requirements and would irreparably harm the public's ability to understand educational equity and performance.[2] Their case highlighted that IES is not a bureaucratic luxury but a legal and practical necessity.

Equally troubling is the fact that the contract cancellations announced by the Department, which the Administration reported as nearly $900 million in "savings," in reality included many studies that were already underway, some nearly complete, and others even required by law. For example, evaluations of federally required literacy interventions and special education programs were halted midstream, leaving taxpayers with the sunk cost of contracts and researchers without the ability to deliver final findings. This means that not only has the public lost money already invested, but it has also lost the knowledge and insights those studies would have produced. Such disruptions are damaging on multiple fronts: they waste resources, undermine public trust, and leave policymakers without evidence to guide decisions. We call on the Department to either reinstate these contracts or initiate new procurements so that the studies can be completed and their findings disseminated, ensuring that taxpayer investment yields both knowledge and impact.

[2] https://www.ihep.org/press/ihep-joins-lawsuit-challenging-dismantling-of-institute-of-education-sciences/

This episode underscores why redesign is so critical: IES must be resilient to political shifts, insulated from abrupt disruptions, and equipped with clear statutory protections. Redesigning IES is an opportunity to reverse the damage done and insulate IES's core functions, safeguard long-term data series, and strengthen statutory protections. Without a stronger foundation, the nation risks losing decades of progress in building a coherent, evidence-based system for education policy.

The Case for National Data, Longitudinal Systems, and Federal Leadership

The structure of IES—anchored by NCES and its sister centers—ensures that the nation has access to consistent, comparable, and longitudinal education data. NCES administers essential surveys such as NAEP, the National Postsecondary Student Aid Study (NPSAS), and the Beginning Postsecondary Students Longitudinal Study (BPS), which provide long-term trend data across states and demographic groups. These efforts are irreplaceable; no state or consortium of states has the scale, stability, or independence to carry out these national surveys with methodological rigor.

The Statewide Longitudinal Data Systems (SLDS) program has made significant progress in linking early learning, K–12, postsecondary, and workforce data within states. But capacity is uneven. Some states maintain sophisticated systems with robust staffing, while others struggle to connect basic datasets. Without federal guidance and investment, these disparities will continue to widen, and cross-state comparisons will become increasingly unreliable. National coordination also ensures harmonized definitions—what counts as a "short-term credential," how student success is measured, or which employment outcomes are tracked—so that policymakers, researchers, and the public can trust that findings are comparable.

Robust, national data systems are not only about producing tables and charts. They provide the foundation for accountability, identifying opportunity gaps, and long-term monitoring of public investment. Without them, the nation risks both policy blind spots and wasted taxpayer dollars.

The Need for Federal Leadership and Oversight

While states and localities are critical partners in delivering education, there are clear limits to what they can or will study. States may hesitate to investigate politically difficult questions—such as the effectiveness of policies they championed or the return on investment of costly initiatives—especially if results could be unfavorable. Similarly, states may lack incentives to fund studies on topics whose benefits spill across state lines, such as credential portability or interstate student mobility.

This is where federal leadership is indispensable. Education decisions may be made locally, but the federal government provides enormous financial support—over $100 billion annually in grants, loans, and tax benefits—and has a clear responsibility to ensure those investments are effective. Moreover, the nation as a whole has a strong interest in positive educational outcomes, both for

economic competitiveness and civic vitality. Ignoring evidence or failing to study key outcomes would not only be poor policymaking but a neglect of duty to students, families, and taxpayers alike.

With such a significant public investment in higher education, the government has a particular responsibility to understand how students fare—academically, in terms of completion, and in their ability to repay loans. Ignoring this evidence would not only be poor policymaking but would also be neglectful of the millions of students and families who rely on aid and the taxpayers who fund it. Understanding repayment trends, default risks, and labor market outcomes is essential for maintaining program integrity and protecting the economy. Without comprehensive data and rigorous analysis, the nation risks pouring billions into systems without understanding whether they are delivering value, exacerbating inequities, or threatening long-term financial stability for both households and the federal budget.

A strong, national, and apolitical agency like IES exists precisely to fill this gap. It can tackle politically sensitive questions, sustain studies across decades, and ensure that evidence is not filtered by local political considerations. By maintaining independence, methodological rigor, and continuity, IES safeguards the integrity of education research and protects the public's right to know whether policies and investments are delivering results.

IES is also uniquely positioned to conduct and sustain long-term national studies that states cannot replicate. NAEP—often called "the Nation's Report Card"—has tracked student achievement since the 1960s and provides the only reliable state-by-state comparisons in reading and math. Similarly, surveys such as NPSAS and BPS follow cohorts over time, producing insights into financial aid, persistence, and labor market outcomes. Without IES, these datasets would not exist.

Moreover, if the Administration is serious about redesigning IES to fulfill its mission, it should request robust funding for the SLDS program in its annual budget request to Congress and ensure that states receive the technical assistance and guidance needed to build and sustain high-quality systems. Together, these actions would close critical gaps in our national data infrastructure, giving students, policymakers, and institutions the information they need to understand the return on investment of education and training programs from early childhood through careers.

Finally, federal leadership in education research ensures reliability and comparability at scale. If every state developed its own methods, the resulting patchwork would make national patterns invisible, delay recognition of emerging problems, and weaken policymaking. The federal government must continue to serve as the coordinator, aggregator, and guarantor of high-quality education data.

Recommendations for a Redesigned IES

Protect and Enhance Longitudinal and Assessment Systems

IES should have guaranteed stable, multi-year funding for NAEP, NPSAS, BPS, and related studies. These programs must be insulated from mid-contract cancellations and allowed to evolve with

modular “add-ons” for emergent issues (e.g., pandemic recovery, AI in classrooms, or digital learning). A commitment to continuity is essential: once interrupted, longitudinal series lose their value.

Deepen Data Linkages Across the Education–Workforce Spectrum

A redesigned IES should function as a federated hub that securely links data across early childhood, K–12, higher education, and workforce systems. This requires standard identifiers (with privacy safeguards), interoperability protocols, and harmonized definitions. For example, linking preschool participation data with later NAEP outcomes, or community college enrollment with long-term labor market earnings, would help policymakers understand return on investment. Federal leadership here is essential: no state can fully track interstate mobility, credential portability, or national labor market outcomes on its own.

Embed Opportunity and Representation Centrally

Education access and quality vary across the country, and the federal government should ensure opportunity gaps are being proactively identified and addressed. IES-funded studies must:

- Disaggregate data by race, ethnicity, income, disability status, language, geography, and first-generation status (for college students, military-connected status, and more).
- Oversample underrepresented populations, such as English learners and students with disabilities, to ensure statistical power.
- Report subgroup effects and equity impacts, not just average treatment effects.
- Ensure terminology for English learners is updated to reflect current law (i.e., English learners, not limited to English proficient (LEP)) and consistent across IES data collection and research projects.

Ensure Governance, Accountability, and Institutional Protections

To prevent disruption and maintain independence, IES governance structures should be strengthened and protected from political interference. This means:

- Build protections around programs and initiatives to ensure they cannot be cancelled abruptly or subjected to non-continuance orders without proper cause.
- Provide grantees with strategies, tools, and guidance to help ensure long-term sustainability and impact beyond the grant period.

Foster Feedback Loops, Uptake, and Diffusion

To close the gap between research and practice, IES should prioritize communication, feedback, and evidence diffusion. Evidence must flow in both directions. IES should:

- Convene educators, administrators, and state leaders regularly to identify emerging research needs.

- Track uptake and diffusion of evidence-based practices, not only their efficacy. (See dissemination recommendations below.)
- Provide meta-analyses and synthesis reviews to spotlight promising practices and highlight where gaps remain.

Improve Data Quality, Timeliness, and Accessibility

To maximize the usefulness of IES data, the Department should modernize its systems for accuracy, timeliness, and accessibility.

- Streamline current data collection systems, taking advantage of existing direct certification infrastructure. However, more comprehensive indicators could be developed through cross-departmental data sharing. Income tax data from the IRS could directly observe parental or household income, and has already been piloted in a few states. The administration itself has already proposed such agreements in the context of other programs.
- Support the development of other multidimensional indicators of poverty, and funding transparent research into designing new methods of measurement. This may include technical assistance grants to states to improve SEA and LEA collection.
- Standardize how states report their mandated data to NCES. Even within states, among LEAs, there is a wide range of capacity for data collection. To this end, it may also be helpful to strengthen and further unify reporting guidelines for LEAs.

Expand Dissemination and Scaling of Evidence-Based Practices

To ensure that IES research informs real-world decisions, IES must modernize how it shares and scales evidence-based practices. IES should strengthen mechanisms for disseminating and scaling effective practices, including through RELs, the What Works Clearinghouse, and R&D Centers. Specifically, the Department should:

- Employ cross-sector and social-impact approaches to both design and scale-up. When multiple and different stakeholders are engaged from the beginning in providing design input, they are more likely to be partners in disseminating the results. For example, where feasible and not harmful to research integrity, groups such as educator organizations, education leadership associations, parent groups, social impact organizations, professional learning providers, and even media developers could be engaged by RELs and Comprehensive Centers in processes of research, development, prototyping, testing, and dissemination.
- Develop digital dissemination strategies with communications experts to determine the extent to which practitioners, faculty, and education leaders are seeing and using materials provided by the IES. This would include acting on analytics (geographically, as well as through .edu, .org, and other domains) to improve dissemination strategies and conduct outreach on which communication channels and strategies are most effective.