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Institute of Education Sciences (IES),   October 15th, 2025.
U.S. Department of Education (ED)
Docket ID: ED-2025-IES-0844

RE: Feedback on Redesigning the Institute of Education Sciences (IES)

The Society for Research in Child Development (SRCD) is pleased to submit comments on behalf of our nearly 5,000 members to the request for feedback on the redesign of the IES. We thank you for the opportunity to contribute to this important discussion.

SRCD is a nonpartisan, international, multidisciplinary professional membership association representing thousands of developmental scientists. Our members' work seeks to improve the lives of children and families by exploring how individual differences and complex systems influence human behavior. Their research informs policies and practices in homes, early childhood and education settings, schools, pediatric practices, public policymaking and more.

As a leading organization committed to advancing rigorous, evidence-based research on children's development, SRCD supports dedicated efforts to strengthen IES's role as the nation's premier source of independent, high-quality education research, statistics, and evaluation. IES should prioritize sustaining scientific integrity, ensuring stable staffing and infrastructure, and maintaining a strong federal role in coordinating education research across the country.

   1. **The Role and Impact of the IES**

Since its establishment under the Education Sciences Reform Act (ESRA), IES has served as the nation's leading source of independent, high-quality education research, statistics, and evaluation. Through its four 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 Cener for Special Education Research (NCSER), IES has transformed how education and child development research informs policy and practice in schools and classroom settings.

Through these efforts, IES has advanced evidence-based policymaking by supporting large-scale longitudinal studies, pioneering data systems, and rigorous evaluations that link

classroom practices into learning outcomes. These efforts have improved reading and math instruction, strengthened early childhood education programs, enhanced teacher preparation and expanded support for children with disabilities.[1,2,3,4] IES contributions have also shaped how developmental and educational science approach lifelong learning and address the specific needs of children.[5,6]

It is critical to underscore what is at stake if IES is not properly supported. Lack of federal funding and workforce support would threaten the nation's ability to sustain longitudinal data, limit our understanding of what happens inside classrooms, reduce our ability to understand the effectiveness of programs and limit the development of interventions that serve children and address their specific needs. Furthermore, it would harm the federal government's capacity to coordinate and apply education research at scale, weakening both national and state-level policymaking.

2. Operational Capacity

Rebuilding staff capacity and infrastructure must be the first priority before undertaking any structural redesign or reorganization. Recent reductions in force coupled with the cancellation of contracts have significantly hampered IES's ability to fulfill its statutory mission. These losses have led to unsustainable workloads among remaining staff and disrupted grant management, peer review, and data collection.

[1] Institute of Education Sciences. (n.d.). *National Center for Special Education Research (NCSER)*. U.S. Department of Education. Retrieved October 10, 2025, from https://ies.ed.gov/about/national-center-special-education-research-ncser

[2] U.S. Government Accountability Office. (2015, July 23). *Teacher preparation programs: Education should ensure states identify low-performing programs and improve information-sharing* (GAO-15-598). https://www.gao.gov/products/gao-15-598

[3] National Academies of Sciences, Engineering, and Medicine. (2018). *Transforming the financing of early care and education*. The National Academies Press. https://doi.org/10.17226/24984

[4] Connor, C. M., Alberto, P. A., Compton, D. L., & O'Connor, R. E. (2014). *Improving reading outcomes for students with or at risk for reading disabilities: A synthesis of the contributions from the Institute of Education Sciences research centers* (NCSER 2014-3000). U.S. Department of Education, Institute of Education Sciences. https://ies.ed.gov/ies/2025/01/improving-reading-outcomes-students-or-risk-reading-disabilities

[5] Institute of Education Sciences. (n.d.). *Reading for Understanding Research Initiative*. U.S. Department of Education. Retrieved October 10, 2025, from https://ies.ed.gov/funding/research/programs/reading-for-understanding-research-initiative

[6] Inter-university Consortium for Political and Social Research. (n.d.). *Early Childhood Longitudinal Study (ECLS) Series*. Retrieved October 10, 2025, from https://www.icpsr.umich.edu/web/ICPSR/series/191

For example, program officers at NCER are managing more than the recommended 35 active awards,[7] while the NCES has lost nearly 30% of its full-time statistical staff between fiscal year 2002 and 2021.[8] Program officers at NCSER have been forced to assume responsibilities from other centers to keep essential activities running. Without a sufficient workforce, even well-designed modernization efforts cannot succeed.

SRCD strongly supports a robust federal research workforce with expertise and administrative capacity to manage and advance IES's mission across all four centers. To do this, IES needs to significantly increase staff capacity. Doing so will ensure continuity in critical research, evaluation, and dissemination activities.

While this request for information highlights the goal of accelerating evidence use and scaling promising practices, SRCD emphasizes that such efforts depend on sustained investment in fundamental research. Programs such as NCER's "Reading for Understanding" initiative and NCSER's research on multi-tiered system of support (MTSS) demonstrate the long-term value of basic research in shaping effective education practices. [9] By employing these programs, the IES has been able to provide frameworks with multiple levels of support through coordinated, evidence-based practices, strategies and structures that meet the academic, social, emotional, and behavioral needs of all learners.[10,11,12,13]

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[7] U.S. Department of Education. (2025, April 21). *Fiscal year 2026 congressional justification: Institute of Education Sciences* (Document No. 110173). https://www.ed.gov/media/document/fy-2026-congressional-justification-institute-of-education-sciences-110173.pdf

[8] National Academies of Sciences, Engineering, and Medicine. (2022). *A vision and roadmap for education statistics*. The National Academies Press. https://doi.org/10.17226/26392

[9] Institute of Education Sciences. (n.d.). *The Multi-Tiered Systems of Support (MTSS) Network*. U.S. Department of Education. Retrieved October 10, 2025, from https://ies.ed.gov/funding/research/programs/research-networks-focused-on-critical-problems-of-education-policy-and-practice-in-special-education/multi-tiered-systems-of-support

[10] Institute of Education Sciences. (2019). *Evaluating the impact of integrated behavior and reading multi-tiered systems of support in elementary schools*. U.S. Department of Education. https://ies.ed.gov/use-work/awards/evaluating-impact-integrated-behavior-and-reading-multi-tiered-systems-support-elementary-schools

[11] Institute of Education Sciences. (2019). *Measuring implementation of multi-tiered systems of support (MTSS): Integrated MTSS Fidelity Rubric (IMFR)*. U.S. Department of Education. https://ies.ed.gov/use-work/awards/measuring-implementation-multi-tiered-systems-support-mtss-integrated-mtss-fidelity-rubric-imfr

[12] Institute of Education Sciences. (n.d.). *Project DataWall: A decision support system for MTSS*. U.S. Department of Education. Retrieved October 10, 2025, from https://ies.ed.gov/use-work/awards/project-datawall-decision-support-system-mtss

[13] Institute of Education Sciences. (n.d.). *Multi-tiered systems of support and methodological skill development*. U.S. Department of Education. Retrieved October 10, 2025, from https://ies.ed.gov/use-work/awards/multi-tiered-systems-support-and-methodological-skill-development

To support discovery and application, we recommend that IES:
   a) Maintains a balanced research portfolio supporting both basic and applied studies.
   b) Resumes paused fiscal year 2025 research and training competitions to prevent further disruptions to the research pipeline.
   c) expands training and dissemination initiatives that help translate findings into practice while preserving rigor.

3. Modernization Efforts

Modernizing the IES does not necessarily mean reinventing the Institutes' mission or structure. Rather, it can build on the strong foundation established under ESRA and focus on evidence-informed improvements that enhance efficiency, transparency, and timeliness while preserving rigor and independence.

The NCES model demonstrates how incremental, evidence-informed improvements can enhance efficiency and timeliness while preserving rigor and independence. By partnering with states to develop the EdPass system, NCES has significantly reduced the time from data collection to reporting EDFacts data.[14] Similarly, the School Pulse Panel, adapted from the Census Bureau, provides near real-time insights into key K-12 metrics, such as grade-level performance, tutoring prevalence, and attendance trends.[15] These initiatives exemplify how NCES combines rigorous methodology with responsive data that serves policymakers and educators to access actionable information faster. All this is accomplished without compromising quality and maintaining scientific standards.

That is why it is imperative that any modernization efforts balance support for policy-relevant research with continued investments in foundational science. Advances in literacy policy rely on decades of basic research in developmental psychology, cognitive science, and education. Maintaining this continuum, from discovery to application, is critical for sustaining long-term progress in education and child development. By leveraging proven models such as NCES's incremental improvements and partnerships with states, modernization can increase relevance, timeliness, and accessibility without sacrificing

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[14] National Center for Education Statistics. (2024, November 4). *Common Core of Data (CCD) nonfiscal data releases: How the National Center for Education Statistics improved timeliness*. Institute of Education Sciences, U.S. Department of Education. https://nces.ed.gov/learn/blog/common-core-data-ccd-nonfiscal-data-releases-how-national-center-education-statistics-improved
[15] National Center for Education Statistics. (n.d.). *School Pulse Panel: Surveying high-priority, education-related topics*. Institute of Education Sciences, U.S. Department of Education. Retrieved October 10, 2025, from https://nces.ed.gov/surveys/spp/

rigor. SRCD urges the Department of Education ("the Department") to consider these initiatives as it looks to enhance partnerships with states and other stakeholders as well as improvements to mechanisms for dissemination.

4. Federal Coordination and States's Research Capacity

The federal government plays a unique and irreplaceable role in coordinating education research and data collection across states and institutions. Most states lack the scale, resources, and infrastructure to independently conduct longitudinal studies or maintain robust data systems.

Through the NCES, IES serves as the nation's data backbone, enabling consistent, comparable and representative education data collection across states and populations. States depend on IES data systems to design policy interventions, monitor equity, and assess program effectiveness.[16] Without a strong federal infrastructure, this coordination, and the insights it produces, would be lost.

Modernization and redesign efforts should reaffirm this, by ensuring consistent, comparable education data across states and subgroups; robust federal investments in longitudinal studies, such as High School and Beyond, the National Teacher and Principal Survey, and the Early Childhood Longitudinal Study, which provide essential data to understanding learning trajectories and workforce outcomes; and capacity building partnerships between states, districts, and research institutions that allows for local innovation within a national framework.[17,18,19]

5. Uphold Scientific Integrity and Peer Review

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[16] Carroll, S., & Myers, T. (2025, July 2). The case for IES: Four ways states use federal data to guide postsecondary research and policy. *Institute for Higher Education Policy*. https://www.ihep.org/the-case-for-ies-four-ways-states-use-federal-data-to-guide-postsecondary-research-and-policy/

[17] National Center for Education Statistics. (n.d.). *High School & Beyond (HS&B) - Overview*. Institute of Education Sciences, U.S. Department of Education. Retrieved October 10, 2025, from https://nces.ed.gov/surveys/hsb/

[18] National Center for Education Statistics. (n.d.). *National Teacher and Principal Survey (NTPS)/Schools and Staffing Survey (SASS) - Overview*. Institute of Education Sciences, U.S. Department of Education. Retrieved October 10, 2025, from https://nces.ed.gov/surveys/ntps/

[19] National Center for Education Statistics. (n.d.). *Early Childhood Longitudinal Studies Program (ECLS) - Overview*. Institute of Education Sciences, U.S. Department of Education. Retrieved October 10, 2025, from https://nces.ed.gov/ecls/

Scientific integrity and peer review processes are central to the credibility of education and child development research. As the Department seeks to review and modernize its peer review, grantmaking, and contracting processes, SRCD recommends building on the work funded by the IES and conducted by the National Academies of Science, Engineering, and Medicine (NASEM). Released in 2022, these reports provided comprehensive recommendations for IES's research, assessment, and statistical activities, reviewing existing programs with the intent to strengthen the successful initiative of the IES, while addressing potential updates to current processes. "The Future of Education Research at IES" outlines recommendations relevant to grantmaking, peer review, evidence synthesis, and the promotion of research use, while "A Vision and Roadmap for Education Statistics" recommends that NCES expand internal capacity through contractors, flexible contract types, cost-effective innovations, and performance-based requirements.[20,21] SRCD strongly encourages the Department and the IES to evaluate and incorporate these evidence-informed recommendations as modernization efforts proceed.

This effort should go hand-in-hand with reconstituting the National Board for Education Sciences (NBES) composed of experts in education research, data, and statistics. A fully functional, independent NBES is essential for ensuring that research priorities, peer review, and standards of evidence are guided by scientific expertise and insulated from political influence.

6. Conclusion

We want to thank you for the opportunity to submit a response. Efforts to modernize the IES should seek to strengthen one of the nation's most important education research institutions. IES's work has provided the foundation for decades of developmental and educational progress, from improving literacy and early learning to expanding access and opportunity for all students and communities.

SRCD is concerned that if the IES staffing and research capacity is not addressed, the nation risks losing the ability to generate longitudinal data, understand the critical needs of children in classrooms, and address teacher shortages, among other issues impacting our

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[20] National Academies of Sciences, Engineering, and Medicine. (2022). *The future of education research at the Institute of Education Sciences in the U.S. Department of Education*. The National Academies Press. https://www.nationalacademies.org/our-work/the-future-of-education-research-at-the-institute-of-education-sciences-in-the-us-department-of-education
[21] National Academies of Sciences, Engineering, and Medicine. (2022). *A vision and roadmap for education statistics in 2030 and beyond*. The National Academies Press. https://www.nationalacademies.org/our-work/a-vision-and-roadmap-for-education-statistics-in-2030-and-beyond
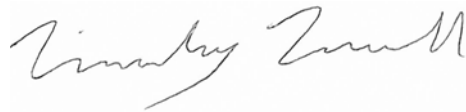
school systems throughout the nation. We encourage careful consideration of these issues and urge the Department to look at successful models as it advances modernization efforts. SRCD also aligns with and supports the more detailed technical comments submitted by peer organizations, including the American Educational Research Association (AERA), whose analysis further elaborates on many points raised here.

Thank you for taking the time to read our response to this notice. Please do not hesitate to reach out to us.

Sincerely,

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