



Docket ID ED-2025-IES-0844

October 15, 2025

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

Dear Dr. Northern,

On behalf of America Forward, I write to share our comments in response to the Department's Request for Information regarding the Institute of Education Sciences (ED-2025-IES-0844).

America Forward leads [the America Forward Coalition](#), a network of 100+ of the nation's most impactful and innovative non-governmental organizations that develop and advocate for more effective public policies to advance opportunity and move all of America forward in policy areas from early learning to workforce development. Many America Forward Coalition member organizations have participated in, or facilitated, rigorous research and experimentation in the education field, ranging from high-impact tutoring to college success coaching sectoral employment programs. Our Coalition includes numerous participants in IES research projects as well as recipients of Investing in Innovation (i3)/Education Innovation and Research (EIR) evidence fund grants.

Our comments emphasize the following points:

- 1) Emphasize action-oriented, practitioner-engaged, quicker-turnaround research
- 2) Accelerate evidence dissemination efforts and align with other agencies
- 3) Enhance technical assistance
- 4) Address key gaps in the research base
- 5) Support data infrastructure capacity and use
- 6) Prioritize rebuilding the capacity of IES, including for education statistics

In general, America Forward strongly supports efforts to strengthen the impact of IES and urges the administration to pursue efforts to rebuild IES's capacity as expeditiously as possible to meet the urgent needs in the field. A renewed IES will be essential to address students' emerging needs, reverse declining achievement levels, and advance evidence-based approaches from early learning through postsecondary and career education.

## **1) Emphasize action-oriented, practitioner-engaged, quicker-turnaround research**

We encourage the Administration to shift IES towards a more action-oriented approach that involves much deeper engagement with practitioners and an emphasis on quicker-turnaround research. IES's support for rigorous evidence-building has been essential to the growth of education research, particularly the explosion of causal research over the past two decades. However, IES's research investments have major areas for improvement.

For example, IES has historically struggled to support the systematic development, adaptation, and scale-up of promising interventions. As the National Academies' 2022 report on IES noted several potential causes for this "lack of consistent progression across project types:" challenges handing off projects between different researchers or research types; hurdles implementing projects in new settings; and the complexities of addressing heterogeneous contexts.<sup>1</sup>

IES must deepen its engagement with practitioners to address these gaps. Historically, IES's funding has been oriented towards, and almost exclusively serves, researchers as the lead recipients. For example, a 2022 analysis found that program developers received only three percent of IES grant funding over the past two decades.<sup>2</sup> Our long experience working with innovation-focused practitioners shows that the structure of funding flows matter: when researchers serve as the lead for nearly all projects, practitioners play a much smaller role in the development and direction of projects.

Moreover, there is a major opportunity to simultaneously rethink the structure of IES research investments. The turnaround on IES projects is often very long and the funding cycle leaves little opportunity for responsiveness to input from the field or changing conditions. While several recent IES initiatives, such as the Accelerate, Transform, Scale pilot and the From Seedlings to Scale project, began to shift IES's efforts in this direction, we support efforts for more dramatic transformation moving forward.

Accordingly, we propose that IES:

- **Emphasize practitioner engagement as a major focus of future research.** IES should emphasize practitioner leadership in projects as a major focus of its work moving forward, including in grant priorities. We encourage IES to seek out complementarities with the practitioner-driven tiered evidence funds operated by ED proper (Education Innovation and Research, Postsecondary Student Success Grants), such as emphasizing evidence-building in areas that are not yet ripe for

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<sup>1</sup> National Academies of Sciences, Engineering, and Medicine (2022), *The Future of Education Research at IES: Advancing an Equity-Oriented Science*. Washington, DC: The National Academies Press. <https://doi.org/10.17226/26428>.

<sup>2</sup> Klager and Tipton (2022), "Summary of IES Funded Topics," Northwestern University, commissioned by the National Academies of Sciences, Engineering and Medicine, [https://nap.nationalacademies.org/resource/26428/READY-KlagerTipton\\_IES\\_Topic\\_Analysis\\_Jan2022v4.pdf](https://nap.nationalacademies.org/resource/26428/READY-KlagerTipton_IES_Topic_Analysis_Jan2022v4.pdf).

extensive scale-up investment or following up on key implementation questions raised in such evidence fund projects.

- **Shift investment towards more applied, action-oriented initiatives in partnership with practitioners.** Alongside engaging practitioners across projects, we support setting clearer pathways from R&D to adoption and scalability, such as by establishing a National Advanced Center for the Development of Education (NCADE) at IES. These efforts should incorporate earlier-stage, formative research, such as pilots, feasibility studies, implementation research, and rapid cycle evaluation to develop and strengthen effective programs, including enabling organizations to fully understand the needs of key populations and then refine their strategies to address those needs. In particular, rapid-cycle evaluation can support quicker, intentional testing, building on decades of experience from the business world and increasing support from federal agencies.
- **Strengthen the IES project review process.** As the National Academies’ report noted, IES’ project review structure makes it “challenging for review panels to track whether a set of funded proposals coherently maps onto the needs of the field,” while “the voices of practice stakeholders are not regularly integrated into review.” IES should restructure its review process, as well as its overall evidence planning process, to ensure deeper engagement with the practice community.<sup>3</sup>

## **2) Accelerate evidence dissemination efforts and align with other agencies**

The creation of IES’s What Works Clearinghouse (WWC) was a watershed moment in evidence-based policy, and the WWC has served as a model for other federal agencies’ clearinghouses. At the same time, the WWC has some serious limitations in its present structure that we urge you to review.

First, the WWC has long struggled to respond quickly to new research and post study reviews. It often takes years for the WWC to review and add syntheses on cutting-edge research. While we recognize the importance of an in-depth review process – one of this comment’s co-authors was once a WWC-certified reviewer during his time at the Department – the turnaround is simply too long.

Second, there are opportunities for greater alignment across agency clearinghouses, and particularly the Department of Labor’s Clearinghouse for Labor Evaluation and Research (CLEAR) and the Department of Health and Human Services’ Pathway to Work Clearinghouse. While each of these clearinghouses has a different core focus, they also have overlapping scopes around workforce-related education and training. However, each clearinghouse’s protocols differ in small but important ways that mean study reviews are not interchangeable (e.g., CLEAR allows quasi-experimental studies to meet its top evidence rating, while such studies are only eligible for a lower rating under ED’s What Works Clearinghouse). There are no compelling policy reasons for these differences; aligning could allow the clearinghouses to increase their speed and output.

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<sup>3</sup> National Academies of Sciences, Engineering, and Medicine (2022).

Third, while the WWC has increasingly emphasized resources for the field, such as practice guides, these IES could go even further to ensure these resources respond to practitioners' needs. That could include, for example, complementary materials that contextualize practice recommendations with clearer examples.

Accordingly, we suggest that IES:

- **Expedite the WWC review process.** In our experience, a series of resolvable logistical or contractual hurdles have slowed the review process in the past.
- **Pursue stronger alignment with the research clearinghouses at peer agencies.** This could mean, for example, establishing a common set of research protocols moving forward so agency clearinghouse reviews are comparable across clearinghouses.
- **Engage with practitioners to strengthen dissemination materials.** As we recommend above, deeper engagement with practitioner communities could help ensure these resources are most useful for the field. IES could also ensure that its materials reference where recommendations relate to federal evidence-based requirements, such as evidence-based provisions in the Every Student Succeeds Act (ESSA).

### **3) Enhance technical assistance**

We encourage the Administration to ensure IES's technical assistance resources including the Regional Educational Laboratories (RELs) are fully responsive to practitioner needs and work in close partnership with any similar resources offered by the Department proper, such as Comprehensive Centers. These efforts should build on recent promising investments such as a new National Rural Higher Education Research Center.

The cutting-edge providers with whom we work are eager for more intensive, responsive support. For example, a report we co-authored earlier this year surveyed more than 50 of the most innovative non-profit postsecondary student success providers and found they were interested in an array of supports to help them refine their models and scale, ranging from support for evaluation and research to financial and sustainability analysis.<sup>4</sup>

In particular, **we encourage the Department to pursue deeper, more systematic engagement with practitioners**, including national and regional non-governmental providers, to understand what has worked well with the RELs and other resources and what could work better moving forward.

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<sup>4</sup> Brown, López, Sackett, and Woodhouse (2025), *The Non-Profit Funding Gap: Strengthening the Postsecondary Student Success Ecosystem*, America Forward and National College Attainment Network, [https://www.americaforward.org/wp-content/uploads/2025/03/NCAN-America-Forward\\_Student\\_Success\\_Report\\_FINAL-1.pdf](https://www.americaforward.org/wp-content/uploads/2025/03/NCAN-America-Forward_Student_Success_Report_FINAL-1.pdf).

#### **4) Address key gaps in the research base**

We encourage the Department to consider key gaps in the research base as it pursues a stronger IES moving forward in partnership with practitioners. We note two here for your consideration.

First, we encourage you to **emphasize the research and development of valid and reliable assessments that will create a more comprehensive and complete picture of students' strengths, successes, and areas for growth**, in alignment with the broad evidence base on whole learner approaches. Bipartisan governors across the nation have widely emphasized a need to strengthen supports for student mental health and well-being; as Arkansas Governor Sarah Huckabee Sanders commented in her annual address, "Suicide rates among teens have tripled, self-harm among girls has risen by nearly 200%, and depression among teenagers has increased by 150%."<sup>5</sup> In turn, these assessments can support new research measuring the impact of whole learner approaches on children's development and outcomes.

Second, **we encourage you to continue broadening IES' scope of investment to recognize the full set of educational programming relevant to the Department**. Historically, IES has dedicated only a small portion of research dollars to education beyond high school: from IES' founding in 2002 through 2020, only 7 percent of IES funding supported "Postsecondary/Adult" projects.<sup>6</sup> Expanding IES's scope – ideally, accompanied by increased appropriations – would enable IES to address some of the most pressing issues in education, including evidence-based strategies to support effective transitions to postsecondary learning and careers.

#### **5) Support data infrastructure capacity and use**

We encourage the Department to expand IES's support for strong data linkages, building on its history of critical investment. State Longitudinal Data System (SLDS) has provided transformational support to develop data infrastructure across the nation.

Moving forward, we encourage you to **take opportunities to expand SLDS support linkages across early learning, K-12, postsecondary, and workforce systems, as well as public benefits systems**, including in alignment with the Workforce Data Quality Initiative (WDQI) program. In particular, we emphasize expanding access for innovative providers to leverage their data for performance management and improvement. We also encourage you to support educational institutions and providers in developing strong, privacy-protected data linkages, including aligned efforts with the Privacy Technical Assistance Center. In the near term, for example, states, institutions, and providers will deeply benefit from efforts that facilitate data linkages for the purpose of Workforce Pell reporting.

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<sup>5</sup> DiMarco (March 10, 2025), "Student Well-Being, School Choice, Higher Ed Top Governors' Priorities for 2025," *The74*, <https://www.the74million.org/article/student-well-being-school-choice-higher-ed-top-governors-priorities-for-2025/>.

<sup>6</sup> Klager and Tipton (2022).

**6) Prioritize rebuilding the capacity of IES, including for education statistics**

Finally, we strongly encourage you to rebuild the human capacity of IES as quickly as possible. The present lack of capacity has slowed progress in the field at a critical time. Moving forward, the Department should prioritize adding staffing for critical ongoing functions, such as administration of key national surveys, while also building out the necessary staffing for the more expansive, transformational changes we recommend above.

**Conclusion**

Thank you for the opportunity to provide input on this vital issue. We would be happy to discuss any of these issues in more detail. Please feel free to contact us at [chase.sackett@americaforward.org](mailto:chase.sackett@americaforward.org) and [heather.rieman@americaforward.org](mailto:heather.rieman@americaforward.org).

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