

October 15, 2025

Amber Northern
Senior Advisor
Office of the Secretary
US Department of Education
400 Maryland Avenue SW
Washington, DC 20202

Re: Request for Information for Feedback on Redesigning the Institute of Education Sciences (IES)

[Docket ID:ED-2025-IES-0844]

Dear Senior Advisor Northern,

The undersigned organizations are committed to using data and evidence to improve transparency as well as education and employment outcomes for individuals and communities across the country. Through a variety of approaches, we all seek to promote data policies and practices that result in better impact, support, and services for individuals and communities, particularly policies and practices that impact the use of statewide longitudinal data systems (SLDSs)—systems that incorporate early childhood, K–12, postsecondary, and workforce data. We are writing to provide feedback in response to the Department of Education’s (ED) request for public input on strategies to reimagine the Institute of Education Sciences (IES).

The federal government has an irreplaceable role in supporting accurate data collection, research, and technical assistance (TA), particularly with its unique authority and national scope through IES and its four centers: National Center for Education Statistics (NCES), National Center for Education Research, National Center for Special Education Research, and National Center for Education Evaluation and Regional Assistance. It is imperative that the federal government continue to invest in statewide data systems—through the SLDS and Workforce Data Quality Initiative (WDQI) grant programs—as well as state and local data use capacity. Revisions to these programs are necessary to better align them with current state data practices (e.g., Senate HELP Committee Chairman Cassidy’s 2023 bipartisan [Advancing Research in Education Act](#)), but they remain the backbone of the federal-state data ecosystem.

While states should lead in gathering granular data, it is imperative that the federal government maintain essential federal data collections and systems that allow for cross-state, institutional, and program comparisons and nationwide perspectives of our education-to-workforce system. Collaboration with state and local governments and communities is essential to guide federal data priorities and ensure meaningful use. **Any structural changes to IES should preserve the federal government’s role in data collection while also reducing administrative burden on states and localities and protecting individual privacy.**

The comments below address areas where changes to IES will most impact the federal government’s relationship to states in the collection, analysis, and use of education and workforce data.

1. Support states and districts through more responsive technical assistance and capacity building, including building states' capacity for using evidence and creating a culture of continuous improvement.

States are central to the federal education data infrastructure. They collect the majority of administrative data that gets reported to the federal government (e.g., ESEA, Perkins, WIOA) and serve as critical intermediaries between local and federal data systems. As a result, collaboration with states is essential to guide federal education data priorities and ensure meaningful use. A new, reimagined IES should collaborate with and support states by:

- **Building and Maintaining Infrastructure.** While many states fund ongoing system operations, federal support remains essential for larger initial and ongoing infrastructure construction and modernization efforts and investing in human-centered design that can make their data more useful and accessible. The SLDS and WDQI grant programs are the keystone federal data funding grant programs that assist states with the design, development, implementation, security, and use of their longitudinal data systems. While NCES oversees the SLDS program solely, WDQI is overseen jointly by ED and the US Department of Labor (DOL). As the SLDS program has increasingly focused on funding P–20W longitudinal systems, the need for two separate grant programs has decreased. We recommend that ED ask Congress to consolidate the two programs into one flexible source of funding for states to modernize their P–20W longitudinal data systems.

Moreover, we recommend that this new, consolidated grant program be operated in a manner similar to that proposed in the bipartisan Advancing Research in Education Act, including:

- Expanding the eligible grantees beyond the state educational agencies to include the governor, the state's independent data governance body, and multi-state consortia;
- Clarifying the grant program is specifically for P–20W longitudinal data systems (meaning systems must seek to connect, at a minimum, pre-K, K–12, higher education, and workforce data, including workforce training programs and workforce outcomes);
- Requiring evidence of formal data governance for the system seeking grant funding;
- Requiring the use of structured, open, and interoperable data in the systems;
- Making funding available for the development of access tools, analytical capacity, and privacy/cybersecurity improvements in addition to infrastructure modernization;
- Requiring a state funding match; and
- Developing an innovation fund to assist states with new data processes and tools such as the use of AI in analytics.

A revised SLDS grant program with these components could provide the funding stability needed for a strong federal-state data ecosystem that allows for innovation and the ability to nimbly respond to emerging, unanticipated future data needs.

- **Providing TA and Supporting Capacity Building.** Many states are resource-constrained and would benefit from federal support as they build their own secure, interoperable data systems and further their evidence-based policy goals. The federal government could serve as a force

multiplier to state statistical agencies by providing funding as well as analytical capacity and training for state agencies and individuals. Such support could be provided through an expanded Privacy Technical Assistance Center, a new office focused on responsibly enabling data sharing, or by providing a list of TA providers from which states can seek support. Enhanced capacity-building support should also enable states to access data from other states or the federal government for a specific, identified purpose, through partnerships with trusted, public-interest entities that have secure and privacy-protected platforms to facilitate necessary data sharing.

2. Prioritize and streamline federal data collections to balance burden and benefit.

The current administration has shown interest in cross-agency, data-sharing linkages and overall government efficiency. For instance, the administration detailed its interest in streamlining data efforts, particularly between the Departments of Commerce (DOC), ED, and DOL, in a [joint report](#) that focused on integrating and improving data systems to maximize efficiency and effectiveness across workforce development programs and systems. At a higher level, the executive order on “[Preparing Americans for High-Paying Skilled Trade Jobs of the Future Executive Order](#)” also expressed the administration’s interest in streamlining data collections and reporting to understand the effectiveness of education and workforce programs.

ED has a unique opportunity to restructure IES in a way that provides the federal capacity that key data users—including state policymakers, local education agencies, institutions, parents, employers, and researchers—need to better support students and educators. One aspect of federal support is ensuring that all federal education and workforce data collections meet the following shared goals for gathering input and output data:

- Understanding whether widely shared priorities (e.g., increasing academic achievement, helping students thrive, encouraging return on investment) are being met through the programs and interventions receiving government funding;
- Creating a foundation for research into what works well, for whom, under what conditions to meet these identified priorities;
- Protecting the civil rights of all students and workers; and
- Fostering shared accountability by providing recipients of funds with research infrastructure and support.

Federal data collections should also be as minimally burdensome for states and localities and collect as few metrics as necessary to robustly accomplish the above goals. Achieving this goal likely requires a review of existing data collections to determine how to collect the most information in the least burdensome manner. Regular reviews of existing collections should occur through a board structured similar to the National Assessment Governing Board, with both experts and key audiences working together. This board should identify opportunities for streamlining data collections, but foundational collections like IPEDS, EdFacts, Common Core of Data, National Postsecondary Student Aid Study, National Student Loan Data System, National Teacher and Principle Survey, and the Civil Rights Data

Collection should be preserved. Any changes to or cancellations of data collections should follow a transparent public review and comment process.

Assessments, specifically the National Assessment of Educational Progress (NAEP), must continue. NAEP plays a vital role in helping not just state and federal government leaders, but also employers, parents, and communities make decisions about the quality and comparability of state education programs. States and communities use it to benchmark student achievement, employers use it to locate new bases of operation, and federal policymakers use it to assess investments. The scope, frequency, and staffing of NAEP must be sustained, as any reductions will hinder stakeholders' ability to extract timely insights about the condition of the nation's education system. IES should also pursue opportunities to modernize NAEP, such as leveraging AI for generating and testing assessment items.

One approach to ease data access barriers, duplicitous data requirements, and inconsistent understanding and application of privacy protections could be consolidating federal statistical functions into one central location, such as the DOC's Bureau of Economic Analysis, which already houses the federal government's keystone statistical body, the Census Bureau. This approach would require changes to the [Education Sciences Reform Act](#) and thus should be done thoughtfully and transparently over time. But, unlike many other countries and states, which maintain one statistical agency, the United States has a highly decentralized statistical system with 13 principal statistical agencies, three statistical units, and over 100 programs with statistical content.¹ Moving a variety of statistical functions to one department and separating them from the subject-specific agencies in which they reside could protect the independence of the federal statistical system.

However, a new, multi-faceted statistical body would need a governance structure to develop a prioritized research agenda, enforce statistical standards and protocols, and center privacy. Adequate staff with expertise in each area of statistical study would also need to be maintained. While data consolidation can and should lead to efficiencies, safeguards would be needed to ensure that critical data elements and collections are preserved. Additionally, provisions would be needed to maintain secure management of data assets and appropriate access by stakeholders. With respect to the federal investment in education and workforce programs, this streamlined collection could allow for greater insights into whether and how all federally funded education and training programs are working as intended and whether these programs could work more efficiently together to ensure positive outcomes along education-to-employment pathways.

While streamlining data collections will also increase overall efficiency, the protection of individuals' privacy rights must be at the center of all data collections. Data use must be transparent and used only for its original purpose. PII should be used only when absolutely necessary, and even then, under strict access controls and privacy protections. For research, the default should be access to and use of aggregate or individual-level data, not PII.

The Federal Role in Data Collection and Research

¹ See GAO, [Expert Views on the Federal Statistical System: Report to Congressional Committees](#) (Sept. 2025), table 1.

In redesigning IES, the federal government has an opportunity to better support states and districts, streamline the federal data and statistical ecosystem, strengthen statewide and multi-state data systems, protect individual privacy, support research into what works to improve academic achievement and career outcomes, and spur innovation. It is important to consider both policymakers' need for an independent education research, statistics, and evaluation entity as well as the field's need for actionable and useful data and evidence to support learning and decisionmaking by educators and parents. To accomplish this, the undersigned organizations recommend considering the following principles of redesign:

- **Measure What Matters.** Federal education and workforce data collections should gather information to: (1) understand whether priorities (e.g., increasing academic achievement, career attainment) are being met through government-funded interventions; (2) create a foundation for research into what works well, for whom, and under what conditions to meet these priorities; and (3) foster shared accountability by evaluating the efficacy of government investments in education, workforce, and related programs.
- **Make Data Structured and Systems Interoperable.** Public education and workforce data that is not personally identifiable should be structured and open, making it easier to share. Structured data is organized systematically with a clearly defined format and well-defined relationships between different elements. Data systems with clear governance and interoperability enable different systems to read, share, and process data consistently and securely. This mitigates some bias and accessibility concerns and allows artificial intelligence (AI) systems to efficiently access, process, and “learn” from data, leading to better applications, predictive capabilities, and overall AI performance. When data is not in a structured format, it leads to a higher risk of unreliable information being fed into AI processes and misapplied.
- **Make Data Use Possible.** States play a central role in our larger data ecosystem. They collect most administrative data, including personally identifiable information (PII), and serve as a critical bridge between local and federal systems. While most states now fund the ongoing performance of their data systems, they still require federal funding to seed modernization efforts and invest in human-centered design that can make their data more valuable and accessible to employers, educators, parents, and students through dashboards, visualizations, and other tools. States need clarity from the federal government on the application of federal laws and regulations to their work and benefit from economies of scale when the federal government provides TA. States can provide local governments, communities, and state policymakers with better analysis for decisionmaking when they can rely on expertise and analytic capacity from federal agencies.
- **Identify What Works.** Federally funded education and workforce research should focus on ways to improve outcomes (e.g., increasing academic achievement, closing achievement gaps, improving return on investment) for students and workers. It should be practice focused; connected in a meaningful way to local, state, or regional efforts; and ultimately benefit communities.

- **Protect Privacy.** Protecting individuals' privacy and rights must be at the center of all data collections. Federal data collections should be as minimally invasive and burdensome as possible to accomplish publicly identified and agreed-upon (e.g., through statute) priorities and goals. Data should be used only for the purposes for which it was collected. For research, the default should be access to and use of aggregate or individual-level, but not personally identifiable, data. Restricted use access should be provided only when it is needed to accomplish research that advances agreed-upon goals. Data collected by a federal agency should protect individuals' privacy and be used to benefit those individuals—not for alternative purposes without public transparency and input.

Thank you for considering these recommendations for redesigning IES's structure, priorities, and operations to be more efficient and impactful. The undersigned organizations look forward to a continued conversation with ED about the future of IES. Please do not hesitate to contact Kate Tromble, Vice President, Federal Policy at the Data Quality Campaign (kate@dataqualitycampaign.org), with questions or to discuss these recommendations further.

Sincerely,

Advance CTE
All4Ed
Alliance for Learning Innovation
Association for Career and Technical Education
Credential Engine, Inc.
Data Quality Campaign
Data Science 4 Everyone
Education Reform Now
FutureFit AI
Georgetown University Center on Education and the Workforce
Institute for Higher Education Policy
National Center for Learning Disabilities
National College Attainment Network
National Parents Union
New America Higher Education Program
Results for America
Silver Arrow Strategies, LLC
StriveTogether