



AMERICAN STATISTICAL ASSOCIATION  
Promoting the Practice and Profession of Statistics®

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February 1, 2024

The Honorable Miguel Cardona  
Secretary, Department of Education  
400 Maryland Avenue, SW  
Washington, DC 20202

Dear Secretary Cardona,

I write to you as a proponent of evidence-based policymaking and, specifically, the vital role therein of timely, reliable, and objective education statistics in education policies. I also write to urge actions regarding the National Center for Education Statistics (NCES) to ensure impartial, relevant, and timely statistics and to request an opportunity to discuss the issues and recommendations with you.

NCES is the backbone of the US education data infrastructure, reliably researching and reporting on the condition of American education from early education through postsecondary and adult learning, and in an international context. It provides nonpartisan data on education, including the congressionally mandated National Assessment of Educational Progress and Condition of Education report. Founded in 1867, NCES is the second-oldest and third-largest by budget of the 13 principal federal statistical agencies.

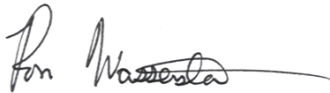
Since my [August 2021 letter](#) to you, two reports have called attention to the urgent needs for NCES. The 2022 National Academies' report, "[A Vision and Roadmap for Education Statistics](#)," discusses the agency's many needs to continue providing reliable, timely, and objective statistics. The second is a November 2023 journal article, "[Bolstering Education Statistics to Serve the Nation](#)," by former NCES commissioners and a former chief statistician of the United States, among others, that further elaborates on NCES' impediments and provides three sets of recommendations to address them. One set focuses on providing NCES control over its professional and statistical operations (referred to in the federal statistical community as "professional autonomy"), which could be addressed in the reauthorization of the Education Sciences Reform Act of 2002, currently being deliberated in Congress. A statistical agency's professional autonomy is foundational to it being an agile and trustworthy agency that can fulfill its Evidence Act requirements.

The August 2023 guidance in the [proposed "Trust Regulation"](#) details many professional autonomy and other aspects of a statistical agency meeting its Evidence Act responsibilities. It also emphasizes the role of the parent agency. For further reference, see "[What Protects the Autonomy of the Federal Statistical Agencies?](#)", a peer-reviewed journal article that discusses the professional autonomy issue in depth, and the fall 2021 discussion titled "[State of the Education Data Infrastructure: What Three Experts Have to Say About the National Center for Education Statistics.](#)"

To further convey the gravity of the issue, I would like to draw your attention to the US Senate language accompanying the draft [FY23 Labor, Health and Human Services, Education appropriations bill](#): "The Committee believes the Secretary, Commissioner and Director of IES should take swift action to support NCES as an independent Federal statistical agency pursuant to recommendations of the NASEM report."

Thank you for your consideration. We would welcome the opportunity to meet with you to discuss the ASA requests and how we can support your efforts to ensure NCES continues to fulfill its mission to provide objective, nonpartisan, and timely education data. The enclosure summarizes our NCES priorities.<sup>1</sup>

Sincerely,

A handwritten signature in black ink, appearing to read "Ron Wasserstein", with a long horizontal flourish extending to the right.

Ron Wasserstein  
Executive Director

Enclosure: American Statistical Association Reauthorization Priorities for the National Center for Education Statistics

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<sup>1</sup> [https://www.amstat.org/asa/files/pdfs/POL-ESRA\\_ReauthTwoPager.pdf](https://www.amstat.org/asa/files/pdfs/POL-ESRA_ReauthTwoPager.pdf)



## **Ensuring Objective and Reliable Education Statistics**

### *Reauthorization Priorities for the National Center for Education Statistics*

The National Center for Education Statistics (NCES) provides information on the condition of education through administrative data collection, status and longitudinal surveys, and assessments. Founded in 1867, NCES is the second oldest and third largest by budget among the 13 principal federal statistical agencies.

**Desired Outcome** – We urge changes in the Education Sciences Reform Act (ESRA) in order to:

*Ensure education statistics are objective, nonpartisan, trustworthy, and relevant because of their wide use for education decisions by families, students, and researchers as well as by school and education administrators, policymakers, and media.*

**Reauthorization Priorities** – To meet this outcome, ESRA should:

- Provide NCES final authority over its budget allocation, hiring, IT, contracting, and publications. Following the model of federal statistical agencies, NCES should have full control over its operations to be clearly accountable, avoiding opportunities for inappropriate external influences.
- Preserve presidential appointment status and reinstate Senate confirmation for the NCES Commissioner. Senate oversight of the NCES commissioner appointment helps ensure a qualified leader and objective education statistics for our nation. Further, presidential appointment and Senate confirmation provides the commissioner with more authority to advocate for independence and relevance of NCES data.
- As part of publication autonomy, make NCES' name and agency-specific logo the prominent name and logo on all NCES' webpages, reports, and products. Because trust in a statistical agency is paramount, NCES' name should be known and associated with its products.
- Restore NCES confidential treatment and protections of data. The quality of NCES data requires survey respondents to trust that NCES will protect their information.

See these March 2023 and November 2023 publications for in-depth discussions, [What Protects the Autonomy of the Federal Statistical Agencies?](#) and [Bolstering Education Statistics to Serve the Nation](#).

[Department of Education founded in 1867 to provide statistics](#)

“That there shall be established at the City of Washington, a department of education, for the purpose of collecting such statistics and facts as shall show the condition and progress of education in the several States and Territories, and of diffusing such information respecting the organization and management of schools and school systems, and methods of teaching, as shall aid the people of the United States in the establishment and maintenance of efficient school systems, and otherwise promote the cause of education throughout the country.”

**Declining autonomy and stature** –The 1988 [Hawkins- Stafford Elementary and Secondary School Improvement Amendments Act](#) made the NCES commissioner presidentially appointed and Senate confirmed and provided NCES sufficient autonomy to ensure objective and reliable

2000's

- NCES moved under Institute of Education Sciences losing publication and budget autonomy, staff appointment and contracting authority, and its advisory panel
- NCES confidential protections of data weakened

2012

- Senate confirmation of NCES Commissioner removed

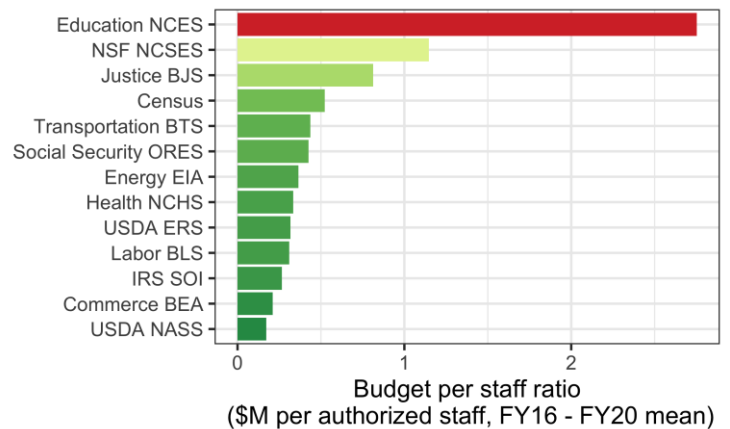
2014-24

- Legislative and administrative proposals to remove presidential appointment of NCES commissioner
- 2020 administration proposal to separate assessments to non-NCES center
- IES branding campaign to lessen focus on centers, undermining NCES further

products. Since then, NCES has lost protections, threatening its ability to produce high-quality, objective data. In addition, a weaker NCES makes it more susceptible to further weakening.



**Strained staff and budget resources** – NCES has a staff of approximately 95 people for a budget of \$306 million. The budget-to-staff ratio of \$3.2 million per FTE is eight times the median ratio of the other principal federal statistical agencies, as the top graph illustrates. The [staffing crisis](#) makes NCES overly dependent on external contractors to conduct planning, technical quality review and analysis functions that should be internal federal activities. Further, for the specialized expertise NCES needs, contractors are often more expensive than direct staff FTEs. NCES’ ability to carry out its work is also challenged by its more than 19% loss in purchasing power over the past 13 years, as shown in the bottom graph.



**Guidance and Support** – Stronger autonomy and stature provisions for NCES are supported by the [Foundations for Evidence-Based Policymaking Act of 2018](#), OMB’s [proposed Trust Regulation](#), [OMB Statistical Policy Directive #1](#), the National Academies’ [Principles and Practices for a Federal Statistical Agency](#) and [A Vision and Roadmap for Education Statistics](#), AERA’s [Recommendations for the Reauthorization of the Institute of Education Sciences](#), and 20 [former statistical agency heads](#).

