



Comment on Proposed Priorities for the Institute of Education Sciences and Request for Comment

May 28, 2019

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The American Statistical Association (ASA) and the Council of Professional Associations on Federal Statistics (COPAFS) are pleased to respond to the [Proposed Priorities for the Institute of Education Sciences \(IES\) and Request for Comment](#), as invited in the *Federal Register* of March 28, 2019 (84 FR 11755).

We note and commend IES's leadership in promoting rigorous evaluation designs such as randomized controlled trials in education research. We urge that continuing such leadership be stated explicitly as a top priority for IES going forward.

The ASA and COPAFS would also like to take this opportunity to comment on a priority for the effective and efficient operation of a key IES entity, the National Center for Education Statistics (NCES). We believe that IES and the Department of Education (ED) should make it a priority to address understaffing and stringent rules on staffing at NCES. We believe that allowing NCES to have more full-time staff will (i) result in taxpayer money being used more efficiently and effectively; (ii) help NCES build internal capacity and staff expertise; (iii) improve the quality of NCES information collections and analyses; (iv) provide more management flexibility to optimize operations; and (v) reinforce NCES' status as a principal federal statistical agency that "must maintain and develop in-house staff who are trained in statistical methodology" as described in the Office of Management and Budget's Statistical Policy Directive #1.

The staff cap at NCES is particularly harmful in that it has sometimes led to an imbalance between the requirements and technical skills of the agency's workforce. This has left the agency with insufficient time to perform the vital function of implementing their many surveys, evaluating them, and facilitating their improvement over time.

For years the NCES Commissioner has been restricted in hiring because IES employees are included in the overall ED salaries and expenses budget. This budgetary structure means that even if IES receives an increase in its statistics and assessment lines, the NCES Commissioner still lacks the authority to hire full-time and permanent staff, leading to growing reliance on contractors.

Over time as NCES employees gradually retire or vacate their positions this problem compounds, resulting in diminished in-house expertise and technical knowledge as well as too

few staff even to manage contracts effectively. For instance, twenty years ago NCES had 115 full-time and permanent staff; in FY17 and FY18 there were only 95 full-time permanent staff members to manage the agency's FY18 \$258.5 million budget for statistics and assessment. This staff-to-budget ratio is particularly problematic for NCES; as a principal federal statistical agency, it is the ED's most important source of objective and independent data to inform policy decisions. If this situation continues, the ED in its entirety will be damaged as a result of reduced capability to internally produce objective data to inform evidence-based educational policy.

With the recent enactment of the Foundations for Evidence-Based Policy Act, the ED will soon need to appoint a senior advisor on statistical matters. As leader of the second oldest and third largest principal federal statistical agency – behind only the U.S. Census Bureau and the Bureau of Labor Statistics in funding – the NCES Commissioner is uniquely positioned to assume this prominent role. In this capacity, the NCES Commissioner should also be granted increased authority to hire and promote full-time and permanent staff to maximize internal capacity, technical knowledge and productivity.

In summary, whatever research priorities IES may have, adequate staffing at NCES—in both numbers of people and representation of crucial technical skills—is essential for IES to successfully fulfill its mission.

Thank you for your consideration.

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Optimizing National Center for Education Statistics Personnel Management, Capacity, Efficiency, and Effectiveness

The National Center for Education Statistics (NCES) in the U.S. Department of Education’s Institute of Education Sciences (IES) provides objective, reliable, trustworthy information on the condition of education through administrative data collection, longitudinal surveys, and assessments. Founded in 1867, NCES is the second oldest and third largest federal statistical agency in budget size among the 13 OMB officially designated statistical agencies.¹ The Department’s longstanding commitment to the collection and analysis of statistics is reflected in NCES’s stated mission:

“...to collect, analyze, and disseminate education statistics at all levels, from preschool through postsecondary and adult education, and including statistics on international education...”¹

Facts-at-a-Glance:

Twenty-five years ago, NCES had 130 full-time permanent staff; in FY17 and FY18, there are 95 full-time permanent staff members. The FY19 budget (statistics and assessment) is \$261 million—12 percent below its FY09 budget level of \$246 million, accounting for inflation.

Problem:

The NCES commissioner is restricted in hiring due to how the NCES and IES staff budget is structured, with IES/NCES employees included in the overall Department of Education budget. The full-time equivalence (FTE) cap on IES hires had led to NCES’s heavy reliance on external contractors, which overall is more expensive than an expert staff workforce and additionally results in insufficient staff to issue and manage contracts.

Request:

Provide the commissioner of NCES more authority and flexibility in hiring and promoting full-time and permanent staff by raising the FTE cap.

Benefit:

- Use taxpayer money more efficiently and effectively
- Help NCES build internal capacity and staff expertise
- Provide more management flexibility to optimize operations
- Reinforce NCES’s status as a principle federal statistical agency
 - Promote independence and objectivity as detailed in OMB’s Statistical Policy Directive #1⁴ and Principle 4 of CNSTAT’s Principles and Practices for a Federal Statistical Agency (P&P)
 - Promote NCES’s authority to select and promote staff as detailed in P&P Practice #2