ASA Response to Department of Education's Request for Information: Feedback on Redesigning the Institute of Education Sciences

October 10, 2025

The American Statistical Association (ASA) appreciates the opportunity to comment on the request for information from the Department of Education: Feedback on Redesigning the Institute of Education Sciences (IES).

The ASA strongly supports the role of independent, trusted, and timely government statistics on education to serve students, families, communities, and states as well as numerous federal functions. To produce such statistics of high quality, we strongly urge measures that make the National Center for Education Statistics (NCES) more agile, accountable, and efficient, which requires addressing the many hurdles and inefficiencies they previously faced and that are well documented.[1]

While the RFI requests feedback on IES as a whole, we focus our comments on NCES, the Department of Education's (ED) statistical agency that dates back to 1867. As the third largest federally funded statistical agency (by budget) and one of 13 statistical agencies recognized by the White House Office of Management and Budget (OMB), NCES's work is different from that of the other IES centers, which primarily focus on grantmaking, research, and evaluation. We therefore believe it is important to consider NCES's needs and challenges differently from the other IES centers and comment on what it needs to produce more timely statistical products,

[1] See for example, A Vision and Roadmap for Education Statistics, National Academies, 2022; Bolstering Education Statistics to Serve the Nation, Elliot et al., 2023; The Nation's Data at Risk, 2024, and its NCES-specific content: https://bit.ly/NationsDataAtRiskNCES.

better serve state needs, and be a more agile, efficient statistical agency, while recognizing NCES's role in and dependence with the statistical system.

In these comments, we provide several options for making NCES more agile, accountable, and efficient that do not require statutory change. We start with those options and then explain how they contribute to the RFI's request for specific suggestions for seven objectives and comments on four specific areas of interest.

Five steps to increase NCES efficiency while providing more timely products and better serving states

ASA 1. Delegate necessary authorities to maintain public trust and otherwise carry out Evidence Act and ESRA

The Foundations for Evidence-Based Policymaking Act of 2018 (Evidence Act) gives statistical agencies the responsibility to produce relevant, timely, credible, accurate, and objective statistics, which coincides with the expectation of data users, including the states. OMB's Evidence-Act-required "Trust Regulation" and other statistical policy directives discuss what it means for statistical agencies to fulfill these responsibilities. They also require parent agencies to "enable, support, and facilitate statistical agencies or units in carrying out the responsibilities," including delegation where needed. Delegation of authorities to NCES is chiefly about technical decisions and responsibilities for the collection, analysis, and dissemination of products. See for example section 1321.7(b) of the Trust Regulation. Delegation of authorities is necessary to improve efficiencies, get data to the public quicker, make the statistical agency more accountable to stakeholders, and assure the public of trustworthiness of the data.

For example, statistical agencies are required to be the sole decisionmakers about who accesses data they collect under a pledge of confidentiality, yet sometimes the IT infrastructure they use is run by another part of the department. In those cases, delegating certain decisionmaking is necessary to uphold confidentiality laws. In addition, in the Education Sciences Reform Act (ESRA), responsibilities such as for publication review may be assigned to the head of IES, but should be delegated in order to ensure timeliness, efficiency, and conformance to statistical review standards applicable to statistical agencies. We recommend the standard practice of using an MOU to delineate what is being and is not being delegated, as well as ways in which the parent agencies (IES leadership and the larger Department outside of IES) will enable and support NCES. At least several statistical agencies have such MOUs that could likely inform NCES's and ED's specific situation.

ASA 2. Maintain core collections that provide foundational statistics on education and enable all other data collections

Several NCES data collections provide both the most fundamental information on education in the United States and are core for carrying out the other NCES legally required collections (such as the National Assessment of Educational Progress (NAEP) and the National Postsecondary Student Aid Study (NPSAS)), and legally required work of other federal and state agencies. Besides the intrinsic value of the data provided by these core collections, these should be fully and adequately maintained or the other work cannot succeed. Fully and adequately maintained includes having in-house NCES staff with the appropriate expertise, experience, and equipment to process and analyze descriptive aspects of these data sets as well as oversee, manage, and direct any associated contract work to ensure effective, efficient use of taxpayer funding. The four collections are the following:

- The Common Core of Data (CCD) is foundational to any educational statistical data collection in the nation as it provides the complete list of public K-12 schools and core characteristics such as enrollment. The CCD provides the definitive list of operating public schools for ED and serves as the sampling frame for all sample surveys at NCES, including NAEP, and at other federal agencies.
- The Private School Survey is a corollary to CCD for parochial and other private schools that are in scope for all sample surveys at NCES, including NAEP.
- The Integrated Postsecondary Education Data System (IPEDS) is an interrelated series of surveys that, at the core, is critical for developing an accurate list of postsecondary institutions and their characteristics to be used by the rest of ED and is essential for efficient operations of Office of Federal Student Aid, NPSAS, and related postsecondary sample-based studies.
- The Education Demographic and Geographic Estimates (EDGE) program – which itself draws considerably information from CCD, PSS, and IPEDS – is the foundational source for resource allocation and various policies at the national, state, and local level, providing the following: (1) school district boundary data; (2) geographic mapping of public and private education institutions, including classifying the locale of schools and school districts (i.e., rural, town, suburban, urban); (3) integrated education and demographic data; and (4) support for federal and state policy and academic research necessary to study indicators such as school choice, charter schools, or disaster recovery planning involving schools.

These universe data collections provide the definitive lists and descriptive statistics of K-12 schools and postsecondary institutions in the U.S. Their being up-to-date and

accurate allow for efficient operations in many ED offices, efficient sampling for NAEP, NPSAS, and the many other sample-based collections inside of NCES and conducted by external organizations. Out-of-date frames can significantly increase costs and reduce the timeliness and accuracy of surveys and their statistical products.

ASA 3. Address barriers for NCES accessing data held by states, postsecondary institutions, school districts and schools

Fuller, secure access by NCES to data already collected and maintained by states (e.g., K-12 student-level data held in state longitudinal data systems) and postsecondary institutions could significantly reduce survey data collection across every NCES program, saving millions and increasing timeliness and relevance. For example, NPSAS's survey component could be greatly reduced, saving millions. NCES could respond quickly and nimbly to emerging or emergency data needs without new surveys with such access. Currently, because the Federal Government is prohibited by law from creating student-level databases with information on all students, NCES receives and makes heavy use of aggregated student data, received primarily through CCD, PSS, IPEDS, and EDGE, as discussed above. This approach is highly inefficient because NCES must ask states and universities to produce hundreds of static cross tabulations, which is onerous and slow (it also increases the chances for error), rather than NCES tabulating results itself for core products and in response to evolving or urgent questions.

The President's Executive Order (EO), "Stopping Waste, Fraud, and Abuse by Eliminating Information Silos," directs federal agencies to seek "unfettered access to comprehensive data from all State programs that receive Federal funding." The EO's focus is on what the law calls "non-statistical" use, which is less privacy protecting than using the data for "statistical" purposes. Statistical use is defined and protected under the Confidential Information Protection and Statistical Efficiency Act (CIPSEA; Title III of the Evidence Act). Statistical use of such data by NCES to better and more efficiently meet the needs of states is likely to be seen more favorably than the non-statistical use of these data, which is traditionally and appropriately seen as more privacy invasive. Therefore, NCES would benefit from a fresh legal review of options to harness this major efficiency opportunity. Working with ED's Office of General Counsel and perhaps the legislative affairs team, as well as OMB (which has primary authority to interpret CIPSEA's legal data access authority), ED could seek creative solutions to the historical ban on establishing and maintaining student records systems. Even deidentified data sharing from states or institutions to NCES would greatly lower the administrative burden on respondents (e.g., states, districts, schools, and postsecondary institutions) and increase the timeliness and usefulness of the data produced by NCES. This could be made a "win-

win" as part of providing new value to respondents from greater engagement with NCES, and could be maintained by establishing a routine system for partnering with states and other major data providers and beneficiaries.

ASA 4. Adjust the ratio of NCES staff to contractors and provide in-house contracting authority and capacity to carry out its core duties

A higher staff-to-contractor ratio and NCES-specific contracting capability will save money and increase product timeliness. Since ED's founding, NCES has needed to rely on contractor staff to complete its core duties, given peculiarities in ED's administrative arrangements that do not correlate appropriations with staffing, as is the norm in other statistical agencies. This restriction, combined with reliance on contracting authority that resides outside of NCES, locks NCES into contracts that can not be easily modified to address new needs and does not allow contractor personnel carrying out NCES work to be assigned and reassigned to new projects in an efficient manner, limiting agility and raising costs. The restriction also means a significant amount of expertise, experience, and knowledge about NCES work is outside of NCES, some of which, if brought or kept in house, would help NCES operate more efficiently and cost-effectively, operating more like the Bureau of Labor Statistics, Bureau of Economic Analysis, and other major federal statistical agencies. As covered in the Trust Regulation and as a standard operating procedure by other statistical agencies, allowing NCES's leadership to determine the optimal number of internal employees versus contractors will be more efficient. That optimal number should be informed by, for example, the budget-to-staff ratios of the other 12 federal statistical agencies. See Table 4 of this report or this Google spreadsheet. Implicit is a hiring process/office that can move quickly so that NCES can compete for the best talent available.

In addition, we understand that NCES has more contract actions than any other office at ED, yet lacks much of the in-house capability and authority granted to offices with fewer contracts, such as the student financial aid office and National Assessment Governing Board (NAGB), even though ESRA grants direct contracting authority to the NCES Commissioner. Contracts, by their nature, generally are inflexible, and contractor staff cannot be assigned to work on new projects or tasks outside the scope of a current contract the way NCES staff could be. Instead, a new contract must be developed, competed, and awarded. This limits agility and raises costs to respond to emerging or emergency data needs. While NCES has some in-house contract capabilities (e.g., determining what work will be done through contracts), the majority of contract management tasks (e.g., competitions, modifications) are managed outside NCES, which creates delays, adds barriers, and can result in non-NCES staff making decisions that

affect NCES's ability to meet its needs and fulfill its mission. Therefore, providing NCES full contract management capabilities is an administrative change that alone would significantly increase timeliness, agility, and efficiency.

ASA 5. Set the stage for new leadership to continue critical reenvisioning

Determining how NCES can be reenvisioned will take time, planning, and discussion and should be the assignment of the leadership and management team to be put in place at NCES. It is imperative that the new leaders and managers include people with expertise in education, statistics and data science, assessment, psychometrics, and AI, among other topics, as well as statistical agency experience. We recommend the following be among the primary initial objectives, all of which should be carried out with external engagement and input:

a. Determine statistical data collection and dissemination priorities
b. Prioritize data collection efficiency and design innovation, including through partnerships within the federal statistical system
c. Establish formal agreement for NCES to access and provide input into the quality of administrative data collections across the department that are needed to drive efficiency and reduce public burden through dual (statistical and non-statistical) use[2]
d. Centralize critical NCES statistical operations currently dispersed among contractors and elsewhere for consistency and innovation
e. Strengthen governance and coordination structures
f. Rebuild technical expertise through strategic rehiring and new talent pipelines
g. Establish and invest in research and development to enable ongoing innovation and improvement[2]
h. Move existing NCES data sets from contractor computer systems into a single NCES operated data center to improve efficiency, access, and security of data

For example, creating a cross-survey sampling strategy and a common item bank, powered by AI (possible with Federal staff but not with separate contracts for each activity), would address several of these areas and be welcomed by states. Such a system would also reduce the burden on households, schools, districts, postsecondary institutions, and states. A centralized sampling strategy, designed to minimize the number of surveys for which any given school is sampled, could only be performed within NCES. This collaboration would be welcomed by all respondents, especially states and districts; a consolidated request including details about upcoming studies,

[2] This point was made by the Council for Opportunity in Education. See their submission for details.

demonstrating reduced duplication, and coordinated messaging would convey the value to schools, districts, postsecondary institutions, and states selected to participate in NCES surveys. Similarly, a common item bank for survey items across the center, powered by AI, would reduce redundant efforts between programs and help to streamline questionnaire development.

The ASA would be happy to elaborate further on any of these. The five-year strategic plan drafted by NCES leaders to follow up the 2022 National Academies report, A Vision and Roadmap for Education Statistics, would serve as constructive input if not a foundation.

We now discuss how these five points address the RFI's request for specific suggestions to achieve seven objectives and comments on four specific areas of interest. We also provide additional responses as appropriate.

Addressing the RFI invitation for achieving these seven objectives:

Objective 1. Function more cohesively across its four centers to ensure shared goals drive data collection, research funding, and technical assistance.

In 2002, ESRA created three new centers (i.e., NCEE, NCER, and NCSER), mimicking NCES's name and legal infrastructure, and borrowing from its reputation. While imitation may be the most sincere form of flattery, and while this approach strengthened and organized national education research and evaluation, it did so at the expense of NCES and its mission.[1] Since 2002, NCES has operated under a new, ill-fitting layer of bureaucracy that has as its main purpose branding and operating the four centers uniformly despite the fundamental difference between NCES and the other centers. This layer has limited NCES's ability to engage its own stakeholders, produce timely products, and to innovate and operate transparently and efficiently. Therefore IES's continued role, especially as it pertains to NCES, should be reconsidered.

This is not to disparage ED's goal of fostering more cohesive functioning, including across the four activities—so that shared priorities guide data collection, research funding, and technical assistance. This is appropriate and forward-looking. Cohesive functioning across IES can and should inform NCES's data priorities. However, it must not direct them as NCES is not a support arm for the research and evaluation functions.

Rather, it is a statistical agency whose mission was established in 1867 to produce high-quality, policy-neutral data that inform the nation's understanding of education. Its

mission—to describe the condition of education—provides the empirical foundation upon which the other IES centers may build their research, evaluation, and technical assistance activities.

This is not a shared responsibility across IES centers, but a core federal statistical function—one grounded in the same principles of technical autonomy, objectivity, and confidentiality that govern all agencies within the Federal Statistical System, as codified in the Evidence Act's Trust Regulation and OMB statistical policies. Like all statistical agencies, NCES has an important role to play in understanding and meeting the data needs of their home departments. In fact, as a Federal statistical agency, NCES's first fundamental responsibility is relevance, including to its parent agency.

Maintaining this delineation between NCES's statistical mandate and the research and policy priorities of IES is essential to ensuring both scientific integrity and public trust in the nation's education statistics. Therefore, coordination must be achieved in full adherence to the distinct statutory responsibilities of each center, particularly those of NCES, a principal federal statistical agency.

Any steps for more IES cohesiveness should benefit each center while not impeding any. As noted above (and in the references of the first footnote), NCES's agility and efficiency was impeded by various hurdles, inefficiencies, and requirements. Each of our five points above would achieve this balance of IES cohesiveness while ensuring an agile and efficient NCES.

In short, NCES's mission and purpose is driven by a broader set of data needs and legal responsibilities than the rest of IES, including as part of the federal statistical system, should not be driven by the needs of the other three centers, and should not continue to be impeded by an IES layer with that uniformity as its focus.

Objective 2. Better meet the needs of state and local leaders, educators, parents, researchers, and state education agencies.

Better meeting the needs of the states and other stakeholders is indeed a key focus of the five points presented here. Acting on the steps that reduce burden on local and state educational agencies and schools, alongside a systematic engagement process to understand data priorities and needs, would especially serve the needs of these stakeholders while also providing them with timely and actionable data products that better serve their needs.

Objective 3. Improve the timeliness, accuracy, and accessibility of its statistics and research products.

More timely and accessible statistical products is another focus of the five points presented here. We note that NCES has long had a reputation for producing accurate information for the public. Timeliness has long been a struggle for the reasons discussed in the references in footnote 1. So, our recommendations include staffing NCES as recommended in point "ASA 4" above and assuring that staff hired have the necessary statistical and content area expertise to assure that disseminated information is accurate and timely.

Objective 4. Maximize the utility of federal and other education program evaluations

See our response to Objective 1 regarding IES cohesiveness.

Objective 5. Strengthen partnerships with other federal agencies or between state agencies to align data and reduce redundancy.

The partnership of NCES with state agencies and other federal agencies is critical to more timely products for states and others. First, access to state data and cooperation is central to NCES's K-12 statistical programs and understanding their data priorities and needs is essential to an effective partnership. Second, NCES is an integral part of the federal statistical system, relying on other agencies for methodological research, data collection capacity, and more, and contributing to priority setting and decision making in government-wide statistical fora. The stronger the partnership of NCES with states and other federal agencies, especially statistical agencies, the more timely and helpful to states its statistical products will be.

ED's goal to strengthen partnerships across federal and state agencies to align data and reduce redundancy is promising. In many ways, the infrastructure for such collaboration already exists—anchored in long-standing NCES partnerships that have proven effective but remain largely siloed. We recommend re-establishing and enhancing the activities focused on these partnerships.

For example, the NCES Forum, the network of NAEP State Coordinators, and the Common Core of Data (CCD) Fiscal Coordinators each include designated representatives from every state—and, in some cases, large urban districts—who already facilitate technical coordination, data quality, and comparability. In fact, the NAEP State Coordinators are embedded within state departments of education. It is a

particularly strong model of how federal–state partnerships can operate efficiently and with mutual benefit.

In addition, every state now manages a Statewide Longitudinal Data System (SLDS) grant—creating a natural bridge between NCES, the U.S. Department of Education, and other federal agencies that fund similar state-based data systems. These existing partnerships provide a powerful foundation for interagency collaboration aimed at reducing duplication and improving data coherence.

Finally, leaders across the Federal statistical system are building capacity to engage states across policy domains for greater efficiency and capacity building, learning from experiences in health, labor, criminal justice, transportation and education statistics.

Moving forward, a structured interagency framework could help realize this vision. Aligning data governance practices and reporting structures would strengthen the nation's ability to track educational pathways and outcomes while reducing the reporting burden on states.

Objective 6. Improve mechanisms for disseminating and scaling evidence-based practices, including the work of the RELs, WWC, and R&D Centers.

It is imperative to recognize that the dissemination of statistical products is fundamentally different from dissemination of the other IES centers' products. Our first point above, on delegation of authorities, would allow NCES to release its products in a more timely way while also fulfilling the very high federal standards for federal statistics established through law, regulations, and OMB directives.

Objective 7. Modernize its peer review, grantmaking, and contracting processes to encourage innovation while maintaining rigor.

In Obj. 6 we noted the dissemination of statistical products is fundamentally different from dissemination of the other IES centers' products, and this is true for statistical product review as well. NCES had a well-developed approach for product review, which includes a rigorous technical review for accuracy, clarity, and adherence to OMB and NCES statistical standards. IES uses a "peer review" model appropriate for journal articles but not for statistical products. The requirement on NCES to follow that process essentially subjects NCES products to an ill-fitting and unnecessary second round of review. This requirement adds weeks to the schedule without adding value. It also adds cost if revisions are requested, since those are passed along to contractors that staff product development. For these reasons, we recommend that the IES Director delegate

authority to the NCES Commissioner through an MOU or regulation in conformance with the Evidence Act and the Trust Regulations.

For contracting processes, we reiterate the point made in ASA #4 above: Despite NCES having more contract actions than any other office at ED, as we understand it, it lacks the same level of in-house capability and authority (i.e., contracting officers with the authority to compete, award, and modify contracts) granted to offices with fewer contracts (such as FSA and NAGB), even though ESRA grants direct contracting authority to the NCES Commissioner. This administrative change alone would significantly increase timeliness especially, assuming NCES is allowed to have sufficient staffing to do so.

Addressing the RFI's "Specific Areas of Interest":

SpecificInterestArea 1. Prioritize and streamline federal data collections to balance burden and benefit.

Prioritizing and streamlining federal data collections to balance burden and benefit are both addressed in ASA 1-5 and our responses to Objectives 2, 3, and 5. Again, access to even de-identified student-level data from the states to NCES would eliminate hundreds of hours of redundant data processing per year.

SpecificInterestArea 2. Leverage its grantmaking to advance impactful, practitioner-relevant research on pressing topics, with specific input on the identification of those topics.

As noted above, the dissemination of statistical products is fundamentally different from dissemination of the other IES centers' products. Our ASA #1, on delegation of authorities, would allow NCES to release its products in a more timely way while also fulfilling the very high federal standards for federal statistics established through law, regulations, and OMB directives.

SpecificInterestArea 3. Improve the reach and utility of evidence dissemination.

While much of NCES's products are descriptive by nature, that does not mean they do not provide valuable evidence about educational activities. Data such as graduation rates, assessment performance, and even enrollment play a crucial role as evidence of the condition of education in the United States. As such, improvements in timeliness and accuracy of NCES's data as enhanced by the recommendations above will improve the reach and utility of evidence about education in the United States.

SpecificInterestArea 4. 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.

Our responses to Objectives 2, 3, and 5 — meet the needs of stakeholders; improve the timeliness, accuracy, and accessibility of its statistics; and strengthen federal and state partnerships — explain how action on ASA's 5 points would help build states' capacity for using evidence and creating a culture of continuous improvement through more timely and state-specific data and therefore more comparability of data across states.

In fact, the Department's goal to support states and districts through more responsive technical assistance and capacity building is well aligned with the long-standing objectives of the Statewide Longitudinal Data System (SLDS) program, which NCES administers. For nearly two decades, SLDS has provided technical assistance, promoted data quality, and strengthened state capacity to use data for decision-making and continuous improvement.

Moreover, the opportunity before us extends well beyond SLDS. Advances in artificial intelligence, data integration, and predictive analytics now make it possible to transform technical assistance into a more dynamic, data-informed enterprise. By connecting SLDS-type investments with emerging AI research and development, states could receive real-time analytic feedback, model policy scenarios, and identify equity gaps more efficiently—creating a living system of continuous improvement rather than a static reporting process.

Equally important, this vision can be amplified through the interagency and intergovernmental partnerships discussed earlier—linking education data with workforce, health, and social service systems to provide richer, more actionable insights. A coordinated national framework for technical assistance, drawing on NCES's statistical expertise, and in partnership with the other statistical agencies, could help states modernize their data systems, responsibly harness AI tools, and cultivate sustained capacity for evidence-based improvement.

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