



AMERICAN STATISTICAL ASSOCIATION
Promoting the Practice and Profession of Statistics®

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August 5, 2021

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

Dear Secretary Cardona,

Congratulations on your confirmation as secretary of education. 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. Such statistics will be invaluable as you work to bring students and teachers safely back to the classroom and address the disparate impact of the pandemic and school disruptions that have been particularly acute for students of color and students from low-income backgrounds. I write to urge actions regarding the National Center for Education Statistics (NCES) to ensure impartial, relevant, and timely statistics in the short- and long-term 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, as well as in an international context. It provides nonpartisan data on education, including the congressionally mandated National Assessment of Educational Progress and the Condition of Education report. Founded in 1867, NCES is the second-oldest and third-largest by budget of the 13 principal federal statistical agencies.

In sharing the American Statistical Association's (ASA) requests, I seek to build on the long tradition and subsequent broad recognition of the federal role in statistics and the critical service they provide to the American public and democracy, which started with Congress's 1867 founding language for the department:

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.

The importance of and guidance for reliable, impartial federal statistics have been recognized in the US by the Office of Management and Budget (OMB), Congress, and the National Academies. Indeed, the National Academies published this spring the seventh edition of *Principles and Practices for a Federal Statistical Agency*.¹ Representing years of accumulated wisdom and experience by the National Academies' Committee on National Statistics observing, advising, and evaluating the federal statistical agencies, the report lays out the five principles required for an effective statistical program: (1) policy and societal relevance; (2) credibility among data users and stakeholders; (3) trust among the public and data providers; (4) independence from political and other undue external influence; and (5) continual improvement and innovation. These principles and practices are issued by OMB in Statistical Policy Directive No. 1 and have been codified in the Foundations of Evidence-Based Policymaking Act of 2018. We encourage you and your staff to review and support the guidance in each of these documents.

Turning to our requests, NCES Commissioner James Woodworth's term ended in June. We urge the appointment of the next commissioner as quickly as possible to ensure continuity in leadership. In doing so, we request you give serious consideration to individuals who have strong leadership, management, and scientific skills; experience with the federal statistical agencies; familiarity with NCES and working knowledge of its products and broader relevance; visibility in the federal statistical community; an ability to interact effectively with Congress and senior Department of Education staff; and an understanding of the *Principles and Practices for a Federal Statistical Agency*.

We urge your immediate attention to NCES's staffing crisis,² which hampers its ability to not only maintain its ongoing programs but to be agile and responsive to new data needs and responsibly use taxpayer funding. The NCES budget-to-staff ratio is many times greater than that of the other federal statistical agencies.³ Put another way, NCES staff, on average, have higher responsibility than their counterparts in similar agencies. As a result, NCES staff are burdened to provide sufficient oversight of contractors and lack the agility and bandwidth to identify and respond to new opportunities and new and changing data needs.

Relieving the NCES staffing crisis will allow it to execute more effectively the School Pulse Survey (SPS) that was funded as part of the latest COVID-19 emergency spending package. The SPS is intended to

¹ <https://www.nap.edu/catalog/25885/principles-and-practices-for-a-federal-statistical-agency-seventh-edition>

² <https://www.washingtonpost.com/education/2020/03/31/understaffing-threatens-work-key-us-education-statistics-agency-experts-say/>

³ <https://magazine.amstat.org/blog/2021/03/01/fed-stat-agencies/>, Table 3.

address the unprecedented educational challenges brought about by the pandemic and help reopen schools and return students and teachers to the classroom safely and securely. Fifty-five organizations signed a February 1 letter to Congress in support of the funding and urging NCES be allowed “the wherewithal to hire additional full-time technical staff.”⁴ More staff at NCES and the Institute of Education Sciences (IES)—specifically data scientists, data privacy, and administrative record experts—will address the challenges of declining response rates and the opportunities of powerful computational and methodological advances, as well as a wealth of non-survey data to incorporate into NCES statistical products.

Later this year, you will be submitting FY23 budget information to OMB. As you prepare the FY23 budget materials, we ask you to address the NCES statistics account funding, which was funded for FY21 at \$111.5 million. This is a small increase over this account’s FY10 level of \$108.5, which means the NCES statistics line has lost 15 percent in purchasing power over this period, further constraining NCES’s ability to be responsive to new data needs. The administration’s FY22 request flat funded the account. In developing your FY23 and subsequent budget requests, we ask you to work closely with IES and NCES staff, as well as outside experts, to develop a bold vision to address the challenges and opportunities described above, as well as the data needs of education policymakers over the next decade. In addition to sustaining and restoring existing programs, NCES needs budget and staff resources to research the use of administrative records, harness the latest computational and methodological advances, and incorporate the use of private-sector data. We believe this work will justify an increase to at least \$131.5 million for this account in FY23.

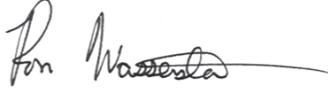
Looking further ahead, the IES is overdue for reauthorization. Should this Congress take up IES reauthorization as recent Senate moves indicate is possible, we ask you to address NCES’s gradual loss of protections put in place by the 1988 Hawkins-Stafford Elementary and Secondary School Improvement Amendments Act to ensure objective and reliable products. The Hawkins-Stafford Act, for example, made the NCES commissioner presidentially appointed and Senate confirmed and provided NCES sufficient autonomy over its publications, budget, staff appointment, and contracting authority. Since then, NCES has been slowly losing such protections, threatening its ability to produce high-quality, objective data. We urge you to engage with us and other stakeholders to discuss the best path forward to ensure reliable, objective, and timely education statistics. We also share the ASA reauthorization priorities posted on their website: https://www.amstat.org/asa/files/pdfs/POL-ESRA_ReauthTwoPager.pdf. Let me also note three National Academies’ studies currently underway regarding education statistics and assessment that will be valuable when they are released later this year or early next.⁵

⁴ <https://www.amstat.org/asa/files/pdfs/POL-SchoolPulseSurveyLetter.pdf>

⁵ <https://www.nationalacademies.org/our-work/a-vision-and-roadmap-for-education-statistics-in-2030-and-beyond>; Add links to the other studies as they become available.

Thank you for your consideration of the attached document that summarizes our NCES priorities.⁶ We would welcome the opportunity to meet with you to discuss the ASA requests and how we could support your efforts to ensure NCES continues to fulfill its mission to provide objective, nonpartisan education data.

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

⁶ https://www.amstat.org/asa/files/pdfs/POL-NCES_Priorities%202021plus.pdf



National Center for Education Statistics

Priorities for the 117th Congress and 2021-2025 Administration

National Center for Education Statistics (NCES)

The principal federal statistical agency that tells us from pre-K through college:

- What students learn;
- What resources are available to students (teachers, counselors, advanced courses); and
- Many other facets of the nation's educational system.

NCES needs

- Technical staff
- Resources
- Independence from political and other undue external influence
- Authority to continue to integrate assessments of learning (the Nation's Report Card) with its other statistical activities.

Mission, Scope, and Products

The National Center for Education Statistics (NCES) in the Department of Education's (ED) Institute of Education Sciences (IES) provides objective, reliable, and trustworthy statistics about the condition of education through administrative data collections, statistical surveys, longitudinal studies, and assessments. Founded in 1867, NCES is the second oldest and third largest in budget among the Office of Management and Budget's 13 principal federal statistical agencies. The NCES's combined statistics and assessment budget lines account for about \$260 million annually. The NCES is currently authorized through the Education Sciences Reform Act (ESRA), which has been due for reauthorization for many years. Its work covers a wide spectrum of topics, including the following:

- The Nation's Report Card (congressionally mandated)
- Condition of Education Report (congressionally mandated)
- Digest of Education Statistics
- Grants, services, resources to states for development of statewide longitudinal data systems
- Longitudinal studies tracing experiences of early childhood students, secondary students and transition to post high school, and college and beyond experiences

- Elementary and secondary finance, school universe, enrollments, graduates, staffing, private schools
- International school practices, education trends, assessment outcomes, governmental policies
- Higher education financed, students, finance, faculty, degrees, transcripts

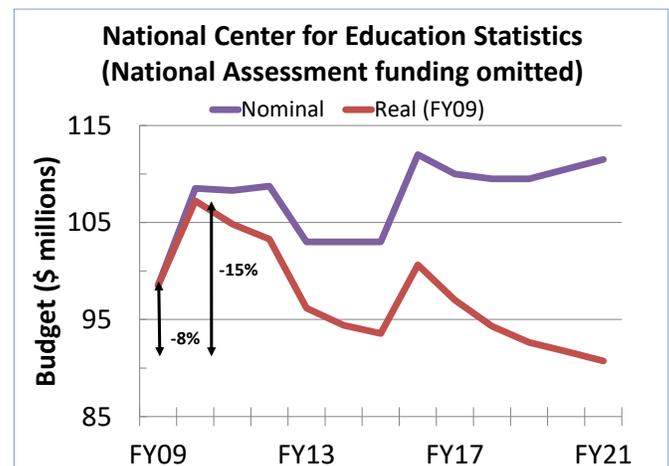
Opportunity: More trustworthy, objective statistics that are timely and local

Policymakers and the American people are confronted with an ever-increasing amount of education data from an expanding number of public and private sources. NCES is the trusted entity naturally positioned to place such diverse sources of data in context to produce actionable information—giving policymakers and the public insights into the condition and progress of education in their communities. NCES has provided objective, reliable education statistics for 150 years, but it has recently faced significant budget constraints due to relatively flat funding that limit the agency’s ability to fully analyze available survey data and meet the rising demand for more timely and location-specific statistics, particularly critical in understanding the impact that the COVID-19 pandemic has had on education across the lifespan.

Federal interest in evidence-based policymaking is also escalating, most notably with the 2019 enactment of the bipartisan Foundations for Evidence-Based Policymaking Act. The “Evidence Act” focused on the role of the federal statistical agencies, in particular, directing the NCES Commissioner to serve as the department’s statistical official.

Challenges

- The NCES statistics budget line has [depreciated in value](#) 15 percent since 2010.
- The agency faces a [serious shortage of full-time equivalent staff](#) (FTE) trained in statistical science. In 2020, the agency had fewer than 95 FTEs to manage its \$260+ million statistics and assessment budget line. This is about nine times the median ratio of other principal federal statistical agencies.
- Because of both budget and staff constraints, NCES faces particular challenges whenever additional or alternative opportunities are presented, such as:
 - ✓ Conducting analyses of currently available data (e.g., education-related questions on COVID-19 in the US Census Bureau weekly Pulse surveys);
 - ✓ Redesigning and restoring the national study of postsecondary faculty (NSOPF)
 - ✓ Developing new data designs to address specific problems and populations;
 - ✓ Beginning a new cycle of a long-standing longitudinal series; or
 - ✓ Expanding on data sharing and linkages that could make existing data more complete and useful.



- The NCES autonomy and stature provisions put in place to ensure objective and reliable education statistics (reaffirmed after recommendations from a 1986 National Academies committee) have been undermined gradually and steadily over the last two decades:
 - ✓ NCES control over its publishing, reporting, and hiring have all been diminished, particularly since the 2002 Education Sciences Reform Act;
 - ✓ Privacy protection controlled by NCES for NCES data potentially threatened in light of National Archives and Records Administration requirements and language in the USA Patriot Act of 2001;
 - ✓ Senate confirmation for the NCES Commissioner was removed in 2012, and there have been several subsequent attempts to remove presidential appointment of the commissioner; and,
 - ✓ The latest administration budget request proposed to split off the NCES assessment of educational progress work into a separate agency, severing the important link of education inputs to what students learn and removing the legal guarantees of independence accorded a statistical agency for those assessment activities.

Priorities

- So that NCES can meet the opportunities and demands discussed above:
 - **Address staffing shortfalls** by allowing the NCES Commissioner to hire more FTEs with training in statistical science by allocating a specific S&E budget line to NCES like those for other independent subagencies in ED, such as the IG's office.
 - **Support additional investments** to NCES' statistics budget line so that NCES can provide objective and nonpartisan analysis of survey data, and ramp up to measure learning loss and educational institution response to the COVID-19 pandemic.
- Strengthen NCES's autonomy and stature in the following ways:
 - **Provide NCES authority over its budget allocation, information technology, hiring, and publications**, as outlined in [Statistical Policy Directive Number 1](#). 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.
 - **Ensure that NCES controls the confidentiality of data and privacy protections.** The integrity of NCES as a statistical agency and the quality of NCES data require survey respondents to trust that NCES will protect their information and that it is beyond the reach of other federal agencies.
 - **Retain NCES assessment activities in NCES.** Assessments must be designed and implemented free of political influence and are most meaningful when associated with education inputs and descriptive statistics. Statistics will also be most informative and cost effective for the federal government and local education agencies when conducted as a complementary activity to other statistical activities by a single administrative unit.
 - **Facilitate more direct access of the NCES Commissioner to the Secretary of Education.** Such access and the presence of the commissioner in policy meetings of senior-level department officials would help ensure that independent data are used to better inform the Department's education policies and support the spirit of the Foundations for Evidence-Based Policymaking Act of 2018. The commissioner of education statistics would contribute greatly to inform department-wide decision-making because of their

command of an extraordinary array of information on education at all levels and on a range of topics—from outcomes, to investment of resources for education, to characteristics of schooling. Further, the commissioner would be better situated to direct NCES resources to inform policy development by hearing first-hand senior-level policy discussions. Making the NCES commissioner equivalent in rank to assistant secretary would be commensurate with the contribution they would provide.

- **Preserve presidential appointment status and reinstate Senate confirmation for the NCES Commissioner for a fixed term of office.** 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 with a fixed term provides the commissioner with more authority and stature to educate and advocate for independence and relevance of NCES data. Reinstatement is consistent with OMB guidance for the significant role of a “statistical official” provided for in the Foundations for Evidence-Based Policymaking Act.

Endorsing Organizations

American Educational Research Association
American Statistical Association
Council of Professional Associations on Federal Statistics (COPAFS)
Consortium of Social Science Associations
Population Association of America/Association of Population Centers

Resources

- *The Washington Post*, [Understaffing threatens work at key U.S. education statistics agency, experts say](#)
- American Statistical Association, [Reauthorization Priorities for the National Center for Education Statistics](#)
- *Amstat News*, [National Center for Education Statistics Faces Program Cuts](#)
- [National Center for Education Statistics: Data to Help Our Schools, Students, and Families Thrive](#), American Statistical Association
- [Principles and Practices for a Federal Statistical Agency: Sixth Edition](#). National Academies of Sciences, Engineering, and Medicine. 2017.
- [Federal Education Data Collection--Celebrating 150 Years](#)

For other federal statistical agency priorities, please visit <https://www.amstat.org/ASA/Science-Policy-and-Advocacy/home.aspx#resources> or <https://copafs.org/activities-initiatives/>. For any questions on these documents, or to have your organization added as an endorsing or supporting organization, please contact Steve Pierson (pierson@amstat.org) or Paul Schroeder (paul.schroeder@copafs.org). For this document specifically, Felice Levine, executive director for the American Educational Research Association, should also be contacted: flevine@aera.net.