

Auburn University
College of Education

Boston University
Wheelock College of Education and Human
Development

Boston College
Lynch School of Education

Florida State University
College of Education

Georgia State University
College of Education & Human Development

Indiana University
School of Education

Iowa State University
College of Human Sciences

John Hopkins University
School of Education

Lehigh University
College of Education

North Carolina State University
College of Education

Oklahoma University
Jeannine Rainbolt College of Education

Penn State University
College of Education

Purdue University
College of Education

Syracuse University
School of Education

Texas A&M University
College of Education and Human Development

The Ohio State University
College of Education and Human Ecology

University of Arizona
School of Education

University of California – Santa Barbara
Gevirtz Graduate School of Education

University of Central Florida
College of Community Innovation and Education

University of Connecticut
Neag School of Education

University of Florida
College of Education

University of Georgia
School of Education

University of Houston
College of Education

University of Illinois Urbana-Champaign
College of Education

University of Kansas
School of Education

University of Maryland College Park
College of Education

University of Minnesota
College of Education and Human Development

University of Missouri
College of Education

University of Nevada-Reno
College of Education

University of North Carolina
School of Education

University of Oklahoma
College of Education

University of Oregon
College of Education

University of Pittsburgh
School of Education

University of Southern California
Rossier School of Education

University of Texas at Austin
College of Education

University of Vermont
College of Education and Social Services

University of Wisconsin – Madison
School of Education

University of Wyoming
College of Education

Vanderbilt University
Peabody College of Education and Human
Development

Virginia Commonwealth University
School of Education

LEARNSM

Learning and Education Academic Research Network
Advancing the Sciences of Teaching and Learning

October 12, 2021

Mark Schneider
Director of the Institute
of Education Sciences (IES)
550 12th Street SW
Washington, DC 20024

Dear Director Schneider,

We are writing on behalf of the Learning and Education Academic Research Network (LEARN) Coalition to provide insight and recommendations to the request for comment made in your blog post titled “Better is Good” on September 15, 2021. LEARN, a coalition of 40 leading research colleges across the country, advocates for the importance of research on learning and development. As experts in the field, many LEARN members regularly receive Institute of Education Sciences (IES) funding for their research and dissemination work. Over the past few months, we have been closely following the National Academies of Sciences, Engineering and Medicine (NAS) panel on “The Future of Education Research at the Institute of Education Sciences (IES)” and are appreciative of the opportunity to comment on the important issues outlined in your blog post. LEARN also responded to the NAS panel’s request for public comment and a copy of these comments are attached to this correspondence.

Involving SEAs/LEAs in IES-sponsored Research

As recipients and oftentimes collaborators of LEARN member research, State educational agencies (SEAs) and local educational agencies (LEAs) are at the core of our members’ everyday work. We agree with IES on the importance of maintaining a strong relationship with these agencies and appreciate IES’ interest in ensuring these relationships guide research in the field. Notably, LEARN member experience have shown that successful agency partnerships are reciprocal in nature, provide both short- and long-term actionable results and do not take from already limited school/district capacity.

In the past, IES’ [research practitioner partnerships](#) encouraged researchers to include SEAs and LEAs in the development of their grant proposals in addition to outlining school/district needs and supports the grant would provide them with. Once granted, IES-funds were able to be utilized as a stipend for partners, which further encouraged their engaged involvement and guaranteed one form of reciprocity. While LEARN members found this program valuable, the benefit of these partnerships was largely limited to only the organizations actively involved in the specific grant or research work envisioned by the partnership. To further drive the expansion of the partnership model, LEARN proposes that IES create a matching directory of locales, school districts, entities and organizations that are seeking research partnerships so that connections can be more efficiently and equitably made. This directory would not promise or require IES grant funding, but rather serve as a clearinghouse for those seeking to connect. Since partnerships are reciprocal relationships, expanding access to this opportunity equally will benefit both the education and research field.

We would like to emphasize that the clearinghouse concept we propose would be most effective if IES is flexible with the types of districts grantees are permitted to partner with as many LEARN members have found themselves restricted from working with viable partners. We certainly respect the need for partnerships with districts that may need the most assistance, but these restrictions have made it difficult to form the most effective partnerships to advance the overall education research agenda. LEARN members have seen this happen more often in States with more rural areas.

With respect to the concept of SEAs/LEAs acting as Primary Investigators (PI's), we have major concerns with such an approach. LEARN members have found that often SEAs/LEAs are not equipped to meet all the obligations and compliance matters required as PI's, consequently, requiring that SEAs/LEAs act as PI's may place an undue and unsurmountable burden upon many SEA/LEA staff. Rather than require an SEA/LEA to act as a PI, which will be restrictive to researchers and overwhelm school and school district personnel (and likely reduce interest in participating in research), we propose IES reinstate the research practitioner partnership grant program with the inclusion of our proposed partnership clearinghouse.

This would provide a diverse range of SEAs/LEAs with a direct role in the grants funded through this effort while not putting undue stress on them or their time. Even if IES were not to reinstate the research practitioner partnership grants, the negative impact of SEAs/LEAs acting as PIs would outweigh any collaborative benefit.

Peer Review Panels

LEARN supports IES' efforts to diversify peer review panels by race and ethnicity and appreciate additional efforts to diversify, like inviting State/local education officials and others with direct involvement in education to panels. We urge IES to focus these diversification efforts around inviting stakeholders who have a deep understanding of education research and the field as a whole. This will broaden panel perspectives while not diluting their authority as reviewers.

Regarding a proposed lottery system, LEARN believes all IES funded applications should go through a rigorous review process. This review both reflects the hard work behind creating grant proposals and the importance of ensuring IES grants go towards top-tier research. LEARN recommends IES pilot test a small lottery review of otherwise highly-rated applications in the event that there are insufficient resources to fund all such applications. After this pilot has been conducted, IES should then consider whether and if to expand the practice after closely observing these results. At no time do we believe that a lottery system should replace the initial rigorous review process to determine quality and suitability for funding.

Scaling Up

LEARN understand IES' concerns about the sometimes-limited scaling-up of education research in the field. We support IES' interest in promoting replication and believe a scaling team would be extremely helpful in guiding researchers on how to widely disseminate their work. While commercialization of the end result of research cannot always be the goal, it is an important component that should be considered for all IES funded research.

As IES considers how best to scale up research and consider commercial applications, we did want to point out a possible contradiction in current U.S. Department of Education (ED) regulations with the goals of scaling up and commercializing IES funded research. During the Obama Administration, ED issued a regulation ([2 CFR 3474.20](#)) that requires a grantee or subgrantee of ED to openly license the public rights of any grant deliverable that is created wholly or in part with ED funds. This regulation has been applicable to competitive grant awards announced after February 21, 2017. We raise this existing

regulation as LEARN was concerned about its impact on scaling up and commercialization of research-developed products when the regulation was first promulgated.

Thank you again for your call for comment, we look forward to reading the NAS panel report in the upcoming months. Should you wish to follow up on this information, please contact Alex Nock at anock@pennhillgroup.com

Best Regards,

Camilla P. Benbow, Ed.D.

Co-Chair, Learning and Education Academic Research Network (LEARN)

Patricia and Rodes Hart Dean of Education and Human Development of the Peabody College of Education and Human Development, Vanderbilt University

Rick Ginsberg, Ph.D.

Co-Chair, Learning and Education Academic Research Network (LEARN)

Dean of the School of Education, University of Kansas

Glenn E. Good, Ph.D.

Co-Chair, Learning and Education Academic Research Network (LEARN)

Dean of the College of Education, University of Florida