COUNCIL for OPPORTUNITY in EDUCATION

Dedicated to furthering the expansion of college opportunities for low-income, first-generation students, and students with disabilities.

October 3, 2025

Matt Soldner, Acting IES Director
U.S. Department of Education
550 12th Street SW
Washington, DC 20024

Re: Docket ID: ED-2025-IES-0844

On behalf of the Council for Opportunity in Education (COE), we appreciate the opportunity to respond to the Department's Request for Information (RFI) regarding the future of the Institute of Education Sciences (IES). As an organization deeply committed to advancing educational opportunity to all students, we offer the following observations and recommendations to strengthen the data infrastructure and research capacity necessary to inform effective policy and practice.

While the RFI requests feedback on IES, we will be restricting our comments to the National Center for Education Statistics (NCES), since most of our work uses NCES products. We believe more effort should be focused on NCES as a center since it is the third largest federally funded statistical agency, with the majority of the staffing in IES before the reduction in force. Additionally, many of the critiques of IES did not pertain to NCES, which has been known to produce accurate nonpartisan statistics, albeit with some challenges in timeliness due to staffing.

Since NCES was incorporated into IES in 2002, it has experienced a steady erosion of resources—including reductions in both staff (e.g., office/administrative staff, IT staff, etc.) and financial support. The lack of funding increases to account for increased labor costs and inflation has hindered NCES's ability to continue its statistical work. As a result, it has cut studies over time.

These changes have had a tangible impact on data availability and are essential to our work. Over time, studies focusing on low-income and first-generation students—key demographics for TRIO grantees—have been scaled back and cancelled. While the Integrated Postsecondary Education Data System (IPEDS) provides high-level institutional statistics, it lacks the granularity to analyze data by income or parental education level. This is why the discontinued sample surveys have been so critical. Such data is necessary to evaluate the effectiveness of federal investments in TRIO and student aid programs.

Recommendations

To address these concerns and strengthen NCES's capacity, COE offers the following recommendations:

1. **Leverage Existing Administrative Data**
   To improve efficiency and reduce burden, we recommend transferring existing departmental administrative data to NCES for release as statistical products. Data from TRIO Annual Performance Reports, the National Student Loan Data System, and other programs can be used to answer important questions at minimal cost. We understand that NCES had begun developing a data science unit for this purpose, which was unfortunately discontinued when the Reduction in Force was initiated. Restoring this function would enable broader data analysis and research without relying solely on periodic high-cost evaluations.

2. **Reduce Contractor Dependence and Increase Staffing Levels at NCES**
   The functions of NCES will remain, regardless of any organizational changes, whether at the Department of Education or if transferred to another agency. NCES has historically had a relatively small staff compared to other statistical agencies like the U.S. Census Bureau and the Bureau of Labor Statistics. This imbalance has worsened due to recent staff reductions. We recommend increasing NCES staffing so it has sufficient expertise to collect data without requiring contractor support. As such, we recommend redirecting funds dedicated to contractors toward staff salaries to allow NCES to manage more data collections internally. If it is not feasible to reduce contractor dependence to this level, the Department could consider implementing these changes, except for call center/data collection operations, which could be outsourced or handled by other agencies.

3. **Invest in Research and Development (R&D)**
   To support innovation and sustainability in data collection, we propose the creation of a Federally Funded Research and Development Center (FFRDC) (see FAR 35.017). This public-private partnership could allow NCES to invest in R&D to increase efficiency further and develop cost-effective data collection methods. Additionally, FFRDCs can be used to re-establish expensive discontinued longitudinal survey studies by leveraging private funds and external researchers to continue the work. FFRDCs are one of the few ways that private funds can be used alongside Federal funds under the law. COE recognizes that many sample surveys are too expensive to be maintained, but much of the data on first-generation and low-income students comes from longitudinal surveys. Investing in R&D and models such as a FFRDC would allow for new methods to answer important questions for these groups.

4. **Expand State Support Through Existing Grant and Technical Support Programs**
   The Department can enhance collaboration with state agencies by expanding the Statewide Longitudinal Data Systems grant program (20 U.S. Code § 9607), Common Education Data Standards, and Cooperative Education Statistics Systems (20 U.S. Code § 9547). Using existing authorities under the Education Sciences Reform Act, the Department could facilitate the development of a state-owned and state-governed national data infrastructure. Such a system would allow for unit-record data collection at the state level in a central or federated data system. This would lower the cost to report data to the federal government by reducing sample surveys. Additionally, the reporting of APR data can be funneled through a system like this, benefiting states, school districts, and higher education institutions that would have aggregated data from their peers to learn about best practices. Any new questions that come from the federal government can be more quickly aggregated and provided without requiring expensive new data collections.

We thank the Department for the opportunity to provide feedback and look forward to continued collaboration in support of educational opportunity and equity.

Sincerely,

Kimberly Jones, JD, CAE
President