Response to Request for Information: Redesigning the Institute of Education Sciences (IES)

ED-2025-IES-0844

Submitted by: Agora Education Research

Executive Summary

This comment addresses how strengthening the Statewide Longitudinal Data System (SLDS) grant program and Common Education Data Standards (CEDS) technical assistance can advance all four priorities identified in the RFI. These programs, established under ESRA Sections 208, 152, and 153, have enabled all 56 eligible states and territories to build P-20W longitudinal data systems. Better integration of SLDS/CEDS data into the larger IES education data and research strategy through improved data governance and cross-program coordination would: reduce federal data collection burden, improve research relevance and efficiency, enhance evidence dissemination, and allow for the provision of effective state technical assistance.

About Agora Education Research

This response is submitted by Agora Education Research, a nonprofit organization of former IES staff with extensive operational experience in NCES data programs, including direct work on SLDS grants, CEDS development, EDFacts reporting, and state technical assistance. Our organizational mission is to preserve and strengthen the education research infrastructure that serves states, researchers, and policymakers.

Introduction

Regardless of IES's future organizational structure, the Statewide Longitudinal Data System (SLDS) grant program and Common Education Data Standards (CEDS) represent critical infrastructure for education evidence-building. This response focuses on how strengthening and better integrating these programs can advance all four priorities outlined in the RFI—whether

these functions remain within IES, move to a restructured agency, or transition to state-led coordination with federal support.

The RFI specifically requests comments on how IES should:

1. Prioritize and streamline federal data collections to balance burden and benefit
2. Leverage its grantmaking to advance impactful, practitioner-relevant research on pressing topics
3. Improve the reach and utility of evidence dissemination
4. Support states and districts through more responsive technical assistance and capacity building

A standards-driven SLDS grant program, supported by robust technical assistance and integrated into broader agency data strategy, directly addresses all four priorities.

Background: Legislative Authority and Program History

The SLDS program was established in the Education Sciences Reform Act (Section 208) to make competitive grants to State educational agencies to "enable such agencies to design, develop, and implement statewide, longitudinal data systems to efficiently and accurately manage, analyze, disaggregate, and use individual student data, consistent with the Elementary and Secondary Education Act of 1965." The grant peer review process is required to promote technical quality, linkages across states, student privacy protection, and research to improve student achievement and close achievement gaps.

Additionally, ESRA Section 152 charges the National Center for Education Statistics with "assisting public and private educational agencies, organizations, and institutions in improving and automating statistical data collation activities, which may include assisting State educational agencies and local educational agencies with the disaggregation of data and with the development of longitudinal data systems" and "determining voluntary standards and guidelines to assist State educational agencies in developing statewide longitudinal data systems that link individual student data consistent with the requirements of ESEA, promote linkages across States, and protect student privacy, improve student academic achievement and close achievement gaps" (Sections 153(a)(3) and 153(a)(4)).

In short, NCES was tasked both with supporting SLDS grants to build and use longitudinal data systems and with providing technical assistance for states building and using these systems, with data standards supporting both responsibilities.

Program Achievements

NCES has supported SLDS grants since FY2006 and has supported the development of common data standards (the Common Education Data Standards, or CEDS) for the last 15 years. The work has been slow but steady: Within a few years of grants being made, 51 states and territories

reported having a K-12 longitudinal data system, and that number has risen to all 56 grant-eligible states and territories.

Data from NCES' 2020 SLDS Capacity Survey indicate significant progress in data integration:

- A majority of states (32, with an additional 4 in progress) link early childhood education data to their K-12 data systems
- Most states (36, with 3 in progress) link postsecondary data to K-12 data
- Many states have established workforce data linkages either directly to K12 data (19 with 5 in progress) or to postsecondary data (22 with 6 in progress) despite technical challenges stemming from the lack of common data elements across K12 education and workforce systems

While data linkages are fundamental to creating longitudinal systems, the true measure of success is whether the data are usable and used. The evidence shows they are: States report using SLDS data for compliance reporting, research, instructional decision-making, and policy analysis. Combining SLDS systems with Common Education Data Standards has improved EDFacts data reporting time and quality, providing the Department with better data for its own decision-making. States have used their SLDS grants to explore the experiences of children in foster care, help schools make instructional decisions, address challenges like chronic absenteeism and disengaged youth, identify workforce and economic development opportunities, and target resources after students and teachers have been displaced by natural disasters.

Recommendations for Strengthening SLDS/CEDS to Advance RFI Priorities

Despite these successes, significant work remains. The following recommendations outline how better integrating SLDS and CEDS into education data and research strategy can advance the four priorities identified in the RFI.

Priority 1: Prioritize and streamline federal data collections to balance burden and benefit

Challenges:

Federal data collections often are crafted without systematic analysis of which data are already being collected at federal and state levels. This results in:

- Data requirements defined in ways that make it impossible to use similar data already being collected, creating inefficient parallel collections

- New requirements that may be out of reach for most states when alternative existing data could serve the same purpose
- Possible redundancies between sample surveys and data already being collected and stored in SLDS systems across the country

Solution: Integrate SLDS and CEDS into agency-wide data governance

The SLDS and CEDS programs must be treated as data assets of the entire agency, not siloed programs. This integration would support efforts to:

Analyze all current data collections comprehensively

- Document all data currently collected by the Department, including sources, uses, and purposes
- Map existing collections to identify redundancies and gaps

Require impact analysis before establishing new data requirements

- Compare any proposed data requirements to existing collections
- Review state capacity using SLDS Capacity Survey responses and CEDS alignment mapping
- Use an agency-wide governance group to oversee this process and ensure stakeholder input

Support the implementation of the CEDS Data Warehouse (CEDS DW) and support state alignment to CEDS standards

- One of the outcomes of the original SLDS legislation is that all grantees built their own longitudinal data systems, resulting in a wide variety of data structures and elements that add complexity to the work of sharing data across states
- In the FY23 SLDS grant round, 23 of 28 awarded states agreed to engage more directly in CEDS development and implementation, indicating strong field support for more interoperable state systems
- A CEDS Data Warehouse structure has been developed, informed by states interested in adopting a full-CEDS Data Warehouse approach for their own state systems
- Providing more field-driven, federally supported work to further develop and implement the CEDS Data Warehouse would decrease the time and money that states need to spend developing their own systems and then making them talk to teach other
- While working on the CEDS Data Warehouse implementation, support the incorporation of the CEDS elements into education data work to provide a "Rosetta stone" for translating data definitions across states
- CEDS standards-based systems make it easier to understand what is already being collected state-to-state

Integrate CEDS into sample survey work

- Map sample surveys to CEDS to identify which data currently collected through surveys might instead be obtained through data sharing from state systems
- This would reduce burden on survey respondents while improving timeliness and coverage

Integrate SLDS and CEDS into formalized cross-agency conversations about longitudinal data system development

- Improve efficiency by supporting systematic planning work across agencies supporting related work, including, for example, the Department of Health and Human Services'PDG-B5 program supporting the development and use of early childhood integrated data systems, and the Department of Labor's WDQI program, designed to improve workforce data and reporting
- Because each program focus needs its own area of expertise to meet needs specific to the agencies, the programs should remain in their own related agencies but need support for systematic and consistent cross-agency leadership-level collaboration to ensure that developments in one agency can be seamlessly integrated with developments in another.

Priority 2: Leverage grantmaking to advance impactful, practitioner-relevant research on pressing topics

Challenge:

Grantmaking is sometimes disconnected from practitioner needs. State education agencies, typical SLDS grantees, and researchers, typical recipients of research grants, can be removed from instructional practice, leading to proposals not directly tied to classroom and school improvement work.

Implication:

Grant spending may not lead to measurable improvements in local outcomes or may take longer than necessary to produce actionable findings.

Solution: Create systematic connections across programs in IES

Institutionalize collaboration across IES programs

- Establish regular communication among teams making grants and awarding contracts
- SLDS grants and related technical assistance provide data critical to research, evaluation, and special education research centers
- NCER recently created a grant requiring collaboration between states and researchers using their data—an important first step that should be expanded

Build research on stable state data infrastructure

- Multi-year evaluations require stable data systems in stable environments
- Regular, predictable SLDS grant rounds and funding, supported by technical assistance and data standards work, create such stability
- Regional Educational Laboratory (REL) proposals should demonstrate SLDS or other state data provider support
- Research projects should show how state data systems would be involved, reducing data collection burden and accelerating research timelines

Require that research questions be expressed in terms of CEDS data elements

- Constructing models with common data elements to it easier for researchers to replicate projects across states
- Research proposals expressed in CEDS elements decreases negotiation time between researchers and states regarding data definitions and uses
- Using common definitions and standards would connect research back to data the agency itself collects, since much of EDFacts has been expressed in CEDS terms

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Priority 3: Improve the reach and utility of evidence dissemination

Challenge:

Evidence dissemination programs operate in silos, limiting cross-pollination of promising practices. States solving similar problems but under different programs and with different researchers often don't know what others have learned. Research findings don't routinely inform SLDS development or improve data collection practices. The SLDS program has successfully connected states to each other based on their implementation challenges and goals but lacked similar insights into what other research efforts were learning.

Implication:

- States reinvent research already developed elsewhere
- Research insights don't flow back to improve data systems
- The Department lacks a systematic way to identify and scale what's working across states
- Promising practices remain localized rather than being brought to scale

Solution: Create systematic knowledge sharing infrastructure

Establish a knowledge hub that includes lessons learned from SLDS, CEDS, research, the RELS, and other IES programs

- Document state innovations and data use cases
- Connect states facing similar challenges with peers who have addressed them
- Make promising practices visible and accessible to all states

Require research findings in CEDS-aligned formats

- IES-funded research using state data should present findings aligned to CEDS
- This makes findings more comparable and replicable across states
- Creates cumulative knowledge base rather than isolated studies

Create voluntary data product certification

- Similar to disclosure risk review for restricted-use data outputs
- Voluntary, incentivized process for state data products meeting interoperability standards
- Verifies adherence to data quality and consistency standards
- Makes certified products more trusted and usable across contexts
- Uses carrots (recognition, increased utility) rather than sticks (mandates)

Coordinate dissemination across programs

- Link REL and other research dissemination with SLDS technical assistance
- Facilitate peer learning when multiple states implement similar initiatives
- Ensure research findings reach the practitioners and policymakers who can act on them

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Priority 4: Support states and districts through more responsive technical assistance and capacity building

Challenges:

Multiple technical assistance programs existed within IES (EDFacts partner support, IPEDS help desk, the Forum, RELs, and SLDS/CEDS programs) without sufficient systematic coordination. While some coordination existed within NCES divisions, there was no systematic, scheduled planning time for cross-Center collaboration, nor leadership support and expectation for such coordination.

Currently, there is no technical assistance focused specifically on building and using statewide longitudinal data systems, nor any single program working directly and consistently with all states and territories.

A national CEDS stakeholder group exists (the Open Source Community, composed of state teams, data owners and users, funders, and data standards organizations), but federal involvement has diminished.

Implications:

- Technical assistance was less effective than possible due to lack of coordination
- Programs operated without the knowledge that systematic sharing could have provided
- Multiple TA programs sometimes targeted the same client groups, or targeted narrower groups than would be efficient

  - For example, RELs might support cross-state research without SLDS data governance support, CEDS data standards expertise, or district buy-in that Forum engagement could provide

Without coordinated federal technical assistance:

- States are forced to contract individually or find relationships with organizations working with small groups of states
- States face higher costs and more contracting time than when IES provided coordinated TA
- While some organizations support state efforts, they tend to work with small groups, leaving other states with little coordinated support
- The field lacks the ability to identify shared needs or bring promising practices to scale nationally

Solution: Establish coordinated, comprehensive state technical assistance

Fully fund coordinated SLDS technical assistance

- Reduce inefficiencies created by each state finding and paying for separate support
- Provide unified approach to soliciting state input and providing support
- Create truly national understanding of state needs and capacity

Establish cross-program technical assistance coordination group

- Establish regular meetings to discuss what program officers are learning about state needs
  - For example, if a REL reports a state experiencing data integration challenges, the SLDS program officer for that state could provide data governance and technical support
- Provide dedicated time and clear expectations for this coordination
- Establish norms for collaboration and escalation of issues beyond the group's capacity
- Ensure leadership support and accountability for cross-program coordination

Designate state points of contact

- Ensure each state has a clear point of contact for support
- Support questions outside of immediate program area
- Expect that point of contact connects state with appropriate expertise
- Create consistency in how states experience federal support

Strengthen federal participation in CEDS Open Source Community

- Re-engage actively with the national CEDS stakeholder group
- Leverage collective expertise of states, researchers, and data standards organizations
- Ensure federal perspective informs and is informed by practitioner experience

Conclusion

The SLDS grant program and CEDS technical assistance represent proven infrastructure for building state capacity, reducing federal data collection burden, and enabling evidence-based decision-making. These programs have successfully helped all 56 eligible states and territories build longitudinal data systems that link early childhood through workforce data.

The recommendations in this response outline how better integrating these programs into broader education data and research strategy—through improved data governance, systematic cross-program coordination, and comprehensive state technical assistance—can advance all four priorities identified in the RFI.

Regardless of future organizational structures, maintaining and strengthening this state-federal partnership in data infrastructure will be essential to:

- Reducing reporting burden through better coordination
- Accelerating research through stable data systems
- Scaling promising practices through systematic knowledge sharing
- Building state capacity through coordinated technical assistance

We appreciate the opportunity to provide this input and stand ready to support efforts to strengthen education data and research infrastructure.

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