AGORA
EDUCATION RESEARCH
A Massachusetts Non-profit Corporation

Agora's September 9, 2026 feedback for *A Vision and Strategy for Remaking the National Center for Education Statistics* *August 25, 2026*

1. What do you like about the report?

The three-responsibilities frame is the report's most important contribution. The paper shows that the second and third responsibilities are not additions to the first — the first depends on them. Nearly all public discussion since 2025 has treated NCES as a data collector, and the paper is right that this reflects most stakeholders seeing only what leaves the kitchen rather than any deliberate omission.

One suggestion toward making that framing stick. Ecosystem support and federal statistical system leadership get treated as overhead the moment anyone builds a budget, and overhead is what gets cut first. The roadmap could guard against this by tying each recommendation to the responsibility it serves, and by pricing the second and third responsibilities as their own line items rather than folding them into the cost of collections. Named separately, they can be defended separately.

The institutional history in the "Understanding Where NCES Is Today" section is the most useful factual account of the NCES–IES relationship now in print. The documentation of how the Section 117 exemption was eroded in practice (IES asserting control over the publication approval process immediately after 2002, General Counsel upholding it, and the subsequent absorption of administrative staff, the web team, servers, and hiring authority) establishes that the statutory protection exists and explains why it stopped functioning. Those are two different claims and the paper is one of the few documents that separates them.

We also welcome two things the report says that are uncomfortable and true. The observation that state governments were notably absent from the objections to the 2025 dismantling, and the conclusion drawn from it about perceived relevance and institutional resilience, is the kind of finding that is easier to leave out. And the ASA 2024 contractor-to-employee ratio evidence reframes the staffing question correctly: NCES's dependence on contractors was a structural consequence of how its staffing line was controlled, not a preference.

2. What do you disagree with or find lacking?

There is no treatment of break in series, and the strategy contains at least three mechanisms that produce one. This is our principal concern with the paper.

The report proposes AI-assisted item generation and automated scoring for NAEP; tiered releases in which preliminary estimates are followed by systematic revision; and substitution of curated existing sources for direct collection. Each of these can break comparability with prior years, and the third can break comparability across states as source practice varies. Comparability appears throughout the paper as a goal and as something NCES produces for others, but not as a property of NCES's own series that has to be actively protected when methods change.

This matters most for NAEP, whose value rests almost entirely on the integrity of its trends, and for the foundational collections, where a gap or a definitional discontinuity cannot be filled in retrospectively. A roadmap that modernizes methods without a break-in-series policy risks purchasing timeliness with the thing that made the data worth having. We would like to see the roadmap specify, in advance rather than collection by collection under deadline, what gets bridged, what is published with a documented discontinuity, and where parallel runs are budgeted. The Blue Book practices on credibility and on openness about sources and limitations bear directly on this.

Curation multiplies the demand for subject-matter expertise rather than reducing it, and we think the paper should say so plainly.

Good survey design already requires deep content knowledge, not only methodological skill. An item written by someone who does not understand how a program actually operates, or what terms the field uses, comes back unusable — a failure common enough to be a standing critique of federal surveys generally. NCES's collections were as good as they were in large part because the people who designed them knew the subject.

Curation asks for that same knowledge and then asks for more of it. Rather than specifying a definition, staff must adjudicate definitions written by others, for universes they did not draw, with error properties they have to discover rather than design. The recourse of fixing a problem by rewording an item is gone, and the number of sources requiring that judgment rises rather than falls. Vetting content across many collections that NCES did not build is a larger undertaking than vetting instruments it did.

None of this argues against the strategy. It argues for stating the staffing implication in the report's own voice. Read quickly, "shifting from a survey-centric model to a curation-centric one" will be heard by budget and personnel decisionmakers as a proposal that needs fewer people. A sentence in the strategy section saying that curation requires more subject-matter capacity than the model it replaces would cost little and protect a good deal.

The capacity discussion is qualitative, and there is now evidence that could make

it quantitative. The report notes that recovering lost expertise will take years. Agora recently completed a census survey of the former NCES staff who separated beginning in late 2024, with responses from 72 of the 91 individuals we could reach, a 79 percent response rate. More than two-thirds reported holding expertise that was unique or nearly unique within the agency, with no internal successor. More than four in ten said they would return to a rebuilt NCES, and that figure has a clock on it — people are settling into other work, and roughly a quarter of those still working are already outside education data entirely. We offer this as material for the roadmap's capacity section rather than as a criticism of the paper.

The roadmap will need a cost profile, and the honest one is front-loaded. Standards development, state capacity building, linkage infrastructure, and disclosure review are investments that precede any efficiency gain. A strategy whose costs arrive first and whose savings arrive later is politically fragile precisely when it most needs protection, and it is safer to state that openly than to have the approach mistaken for a savings proposal and abandoned in year two.

One dissemination point. The paper's treatment of accessibility focuses on user experience, tiered releases, and guidance on interpretation, all of which are needed. We would add that prepared tabulations and reference publications are how the agency reaches users who are not analysts such as school boards, legislative staff, principals, reporters, and parents. A faster and better-curated data layer without a publication layer narrows the effective public to those equipped to handle files, which is a real reduction in reach that is easy to miss because nothing is announced.

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3. Next steps for refining and generating consensus

Add a break-in-series section. It is the shortest path to making the strategy safe to adopt, and it is the objection most likely to come from the agency's own former methodologists.

Say the expertise point explicitly rather than leaving it to be inferred from the capacity section.

Work one collection end to end. A single worked example, such as school finance or CCD, showing what curation would actually require, what it would cost, and what would break, will persuade skeptics that the general case cannot.

Engage former NCES staff systematically. They are a documented and reachable population, they responded to us at 79 percent, and they hold the operational knowledge of why particular collections are built as they are. Agora is glad to help make that connection.

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4. Key aspects of the roadmap

1. **A break-in-series policy**, decided in advance: what gets bridged, what carries a documented discontinuity, where parallel runs are funded.
2. **A sequencing plan.** Stakeholders told the project team that NCES must focus and sequence its work strategically. Given realistic staffing, which parts of the portfolio run while others are rebuilt? This question is currently unowned, and it will be answered by default if it is not answered deliberately.
3. **An expertise inventory** attached to the capacity section: for each function the curation model requires (definitional adjudication, source evaluation, linkage, disclosure review, standards negotiation) what expertise it takes and how much now exists in government.
4. **A recruitment window.** Restoring capacity cannot be the last phase of the roadmap, because the people who would fill it are making other commitments now.
5. **An honest cost profile**, stated as investment before savings.

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5. Key stakeholders to engage

- Former NCES staff, as a group rather than individually. Agora can facilitate.
- SEAs and state longitudinal data system directors, which the report already identifies, and SHEEO on the postsecondary side.
- The postsecondary data community, including organizations that responded to the recent IPEDS RFI.
- Non-technical data consumers whose access depends on the publication layer. Among these are superintendents, school boards, state legislative staff, and education journalists.
- Congressional authorizers and appropriators in both parties, House Education and Workforce and Senate HELP.
- Statistical agencies with long experience producing official statistics from state-supplied administrative records, NCHS in particular, whose vital statistics program is the closest existing analogue to what this strategy proposes.
- Disclosure review and confidentiality expertise, including former members of the IES Disclosure Review Board.

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6. Other comments

Agora Education Research is a nonprofit focused on federal education statistics, with staff drawn from former NCES and IES personnel and contractors. Our initial survey findings were published 09/09/2026 in our newsletter, Data Currents, Volume I, Issue 10 , at edevaluator.org, with the full report including coded open-ended responses to follow

later this month. We would welcome the chance to brief the project team on what the findings imply for the capacity and expertise sections of the roadmap.

We offer these comments as a friendly critique. We think the vision is broadly right, and that the risks we have named are the ones most likely to defeat it in implementation rather than in argument.

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