

October 15, 2025

Amber Northern, Senior Advisor
Office of the Secretary
U.S. Department of Education
400 Maryland Avenue SW
Washington, DC 20202

Dear Senior Advisor Northern:

On behalf of the American Council on Education (ACE), the American Association of Community Colleges (AACC), and the American Association of State Colleges and Universities (AASCU), we write with comments in response to the Request for Information (Docket ID: ED-2025-IES-0844) on how the Institute of Education Sciences (IES) can modernize its programs, processes, and priorities to better serve the needs of the field and American students. Given the short turnaround time (less than 30 days), our comments are not detailed, but we hope to further engage with the U.S. Department of Education (Department) as it undertakes this important work around strengthening IES.

IES has funded education research and maintained extensive national education statistics through the National Center for Education Statistics (NCES), which have been used to improve education from cradle to career. For institutions of higher education, researchers have used IES grant funding and data to improve student outcomes from preschool through postsecondary education. By ensuring access and availability of relevant, reliable, and rigorous data, IES helps support researchers, policymakers, and consumers. As a recent report from Brookings noted, trying to improve education without data is inefficient.¹ Also, as Secretary McMahon recently stated in announcing priorities for the Department's discretionary grants, "Amid declining academic outcomes, the Department is committed to revitalizing American education to prepare every student for success in school, work, and life."² In any reorganization or restructuring of IES, it will be important to strengthen NCES to ensure it remains a trusted source for data for researchers, educators, and policymakers.

Institutions of higher education also play a vital role in providing the data that make NCES the authoritative source of information—for example, through the Integrated Postsecondary Education Data System (IPEDS). While institutions are statutorily required to report data to IPEDS, its success has been built on sustained engagement and partnerships between community stakeholders and NCES. We therefore urge that any restructuring preserve and strengthen the sector's advisory and consultative roles in developing data collection and reporting systems, such as Technical Review Panels.

¹ <https://www.brookings.edu/articles/cutting-research-funding-would-make-education-less-effective-and-efficient/>

² September 25, 2025 "U.S. Department of Education Releases Secretary McMahon's Meaningful Learning and Workforce Readiness Supplemental Priorities." <https://www.ed.gov/about/news/press-release/us-department-of-education-releases-secretary-mcmahons-meaningful-learning-and-workforce-readiness-supplemental-priorities>

In addition, this effort to reexamine IES should aim to strengthen and support grantmaking for education research. IES remains one of the few U.S. research agencies dedicated to supporting education research. IES research has long responded to national education priorities, including special education, education for Americans with disabilities, support for best practices, and information for local and state policymakers. In February, the Administration abruptly canceled 89 IES contracts worth nearly \$900 million, including long-term studies on student learning and research on teaching strategies and support for youth with disabilities.³ Going forward, it will be important that IES grants are structured and awarded in ways that provide funding stability and ensure that policy priorities do not shift abruptly. In addition, the peer review process must be protected to guarantee that U.S. taxpayer dollars go to support the highest-quality science and research.

We stand ready to help and hope there will be further opportunities to weigh in on the Department's reexamination of the research and data efforts at IES.

Sincerely,

A handwritten signature in black ink, appearing to read "Ted Mitchell".

Ted Mitchell
President

On behalf of:

American Association of Community Colleges
American Association of State Colleges and Universities
American Council on Education

³ Quinn, R. & Knott, K. (2025). \$900 Million in Institute of Education Sciences Contracts Axed. *Inside Higher Ed*. <https://www.insidehighered.com/news/faculty-issues/research/2025/02/12/900m-institute-education-sciences-contracts-axed>