



October 15, 2025

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

RE: ED-2025-IES-0844 - Submitted via Regulations.gov

Dear Dr. Northern,

The Consortium for Constituents with Disabilities (CCD) is the largest coalition of national organizations advocating together for federal public policy that ensures the self-determination, independence, empowerment, integration and inclusion of children and adults with disabilities in all aspects of society. The Education Task Force of CCD monitors federal legislation and regulations that address the educational needs of children and youth with disabilities and their families, including under the Individuals with Disabilities Education Act (IDEA), the Every Student Succeeds Act (ESSA), Section 504 of the Rehabilitation Act of 1973, and the Americans with Disabilities Act (ADA). The Developmental Disabilities, Autism, and Family Support Task Force of CCD advocates for federal public policies that directly relate to individuals with developmental disabilities, autism spectrum disorders, family supports and the prevention of child abuse and neglect. The co-chairs and members of these Task Forces appreciate the opportunity to comment on the U.S. Department of Education (Department) request for information (RFI) on redesigning the Institute of Education Sciences (IES).

The federal government has a distinct role in education data collection and research as detailed in previous CCD Education Task Force communications with the Department and Congress.^{1,2,3} The CCD Education and Developmental Disabilities, Autism, and Family Support Task Forces write in response to the RFI to ensure IES is able to fulfill its core functions which are critical to understanding and serving the needs of students with disabilities and their educators. Our feedback will begin with general recommendations followed by responses to the specific areas of interest in the RFI.

General Recommendations

Recommendation: Reinforce and bolster IES' independence and existing functions while developing new advancements.

1 See Letter to Director Schneider, (2019), re: Proposed Priorities for the Institute of Education Sciences and Request for Comment, and CCD Education TF Letter IES: <https://www.c-c-d.org/fichiers/CCD-Ed-TF-Letter-IES-topics-final.pdf>

2 See Letter to Members of Congress (2012): re: Funding for the National Center for Special Education Research, at: https://www.c-c-d.org/fichiers/CCD_NCSER12111.pdf

3 See letters to the House Appropriations Committee and Senate Appropriations Committee, (2002-2025), archived from 2009 forward at: https://c-c-d.org/rubriques.php?rub=taskforce.php&id_task=2&archive=1



IES' quasi-independence ensures high-quality, transparent work across its research, evaluation, and data collection responsibilities. Reliable, consistent data is necessary for student achievement, innovations in research, and decision-making by educators, parents, and other stakeholders, especially as new challenges emerge and technology advances.

Several model IES programs exist demonstrating the agency's valuable work and can be built upon for future initiatives. The National Center for Education Statistics (NCES) developed the School Pulse Panel Survey in response to the COVID-19 pandemic to gather real-time data. The survey remains a useful tool for tracking timely issues such as teacher shortages and chronic absenteeism. The National Center for Education Research (NCER)'s Using Longitudinal Data to Support State Policymaking program requires state education agencies and researchers to form partnerships to answer questions of interest to state policymakers.

Recommendation: Invest in staff and infrastructure capacity to ensure IES fulfills all of its functions and responsibilities.

IES was disproportionately impacted by Reductions in Force earlier this year, eliminating over half of its workforce. Since then, several studies have been canceled due to a lack of staff to conduct or oversee them. This includes the full implementation, analysis, and report on the National Assessment of Educational Performance (NAEP) which is the only assessment that ensures we have representative data that allows us to compare student progress across the U.S.

New and ongoing data collection, evaluations, grant competitions will all contribute to staffing needs. Staff expertise and existing knowledge should especially be considered for longitudinal studies and the restoration of the Regional Education Laboratories. IES' work has historically been supported by contracted employees and services. IES should ensure proper staffing and infrastructure capacity internally and externally to prevent future and reconcile previous disruptions of IES activities. At current staffing levels, we are concerned with IES' ability to carry out its obligations.

Recommendation: Examine and incorporate recent feedback on the future of IES.

Recent legislation and reports have charted potential directions for IES. [S. 3392, the Advancing Research in Education Act \(AREA\)](#) advanced with bipartisan support through the Senate Health, Education, Labor, and Pensions (HELP) Committee in the 118th Congress. It would reauthorize the Education Sciences Reform Act and include several provisions to enhance the timeliness, relevance, and usefulness of IES programs. Three studies funded by IES and conducted by the National Academies of Science, Engineering, and Medicine produced recommendations for NCER and NCSER, including timely and relevant research topics, and NCES, including outreach to data users to better understand their needs.

Specific Areas of Interest in the RFI

1. Prioritize and streamline federal data collections to balance burden and benefit.

Recommendation: Improve the integration of students with disabilities into all aspects of research at IES:



According to a 2021 study⁴ conducted by The Center on Reinventing Public Education and the Center for Learner Equity:

IES currently excludes students with disabilities from certain K-12 IES/National Center for Education Evaluation and Regional Assistance (NCEE)/National Center for Education Research (NCER) studies. IES representatives have claimed that current law *prevents IES from designing studies that are inclusive of all students* (especially students with disabilities) and that only studies authorized under National Center for Special Education Research (NCSE) can specifically include these students. Unless studies are specifically designed to examine questions impacting students with disabilities [and the professionals responsible for their education], they are rarely included in education research. In a recent examination of nearly 400 education-related research reports, news stories, and case studies published since March 2020, less than 20 percent of the literature in our review even made references to the experiences or outcomes of students with disabilities... [and] typically did not differentiate data by disability category or the level of service provided.⁵

More than 90 percent of the 7.5 million students with disabilities (ages 5-21) attend a public school⁶ and 80 percent of the same population participate in a general classroom more than 60% of the time. Activities examining public K-12 education should include and capture students with disabilities and their educators.

3. Improve the reach and utility of evidence dissemination.

Recommendation: Tie IES outputs to usable practitioner-relevant implementation tools and resources.

To ensure IES products are being utilized and reaching appropriate audiences, IES needs to be staffed by individuals with expertise to develop tools and resources that are usable and relevant for leaders and stakeholders. IES ability to fulfill these objectives are limited with the current staffing levels at IES, including its ability to disseminate materials in a timely manner. Writing materials in plain language will enhance accessibility and utility among teachers, school officials, parents, and policymakers.

4. Support states and districts through more responsive technical assistance and capacity building, including building states' capacity for using evidence and creating a culture of continuous improvement.

Recommendation: Continue the separation of technical assistance functions at IES and the rest of the Department of Education.

IES' quasi-independence and mission are outlined in statute⁷ and ensure that IES continues to produce and disseminate high-quality and rigorous research and evaluations. While the Secretary of Education

4 Morando-Rhim, L. & Ekin, S. (2021) *How Has the Pandemic Affected Students with Disabilities? A Review of the Evidence to Date*. The Center on Reinventing Public Education and the Center for Learner Equity (CLE) at: <https://eric.ed.gov/?id=ED615189>

5 See CLE Letter to Chairman Bernie Sanders and Ranking Member Bill Cassidy re : U.S. Senate Health, Education, Labor, and Pensions Committee reauthorization of the Education Sciences Reform Act (2023).

6 U.S. Department of Education, Office of Special Education Programs, Individuals with Disabilities Education Act (IDEA) database, 2023, at: <https://data.ed.gov/dataset/idea-section-618-data-products-state-level-data-files>. See *Digest of Education Statistics 2023*, table 204.60

7 See P.L. 107-279: <https://ies.ed.gov/ies/2025/01/education-sciences-reform-act-2002-0>



(Secretary) is required by other federal education statutes to direct research, evaluation, implementation, and dissemination activities, the focus and expertise required to adequately carry out a given activity can vary widely. We oppose any effort by the Department of Education to merge or interchange separate statutory requirements of general or disability education law with the responsibilities of IES.

For example, the Secretary is tasked by the Individuals with Disabilities Education Act (IDEA) to lead and direct personnel preparation, technical assistance, model demonstration, parent and other training and outreach, dissemination, evaluation, and implementation of scientifically-based research activities designed to support high incidence and low incidence disabilities, beginning and current special educators, general educators, specialized instructional support personnel and state and district leaders.⁸

These responsibilities are carried out by the Office of Special Education Programs (OSEP) as authorized and funded by Congress. The expertise in OSEP that is required to provide technical assistance to states ensuring IDEA compliance to improve outcomes for infants, toddlers, children, and youth with disabilities *is not the same* expertise in IES required to provide technical assistance on the implementation of best research practices and interpretation of statistical data. IES lacks the specific and local knowledge possessed by the 96 Parent Centers, the National and Regional Parent TA Centers, and the Technical Assistance and Dissemination (TA&D) Centers to ensure IDEA implementation. Similarly, these centers lack the research expertise to provide technical assistance on the activities of IES. We implore IES to avoid any reorganization that would interfere with the Secretary's responsibilities as outlined by IDEA and other federal education statutes.

We appreciate the opportunity to comment. Please contact any of the cochairs listed below with questions.

Access Ready, Inc.
Allies for Independence
American Association on Health and Disability
American Foundation for the Blind
American Music Therapy Association
Association of Assistive Technology Act Programs
Autism Society of America
Autism Speaks
Autistic Self Advocacy Network
Autistic Women & Nonbinary Network
CAST, Inc.
Children and Adults with Attention-Deficit/Hyperactivity Disorder
Council for Exceptional Children
Council for Learning Disabilities
Council of Parent Attorneys and Advocates (COPAA)
Division for Early Childhood for the Council for Exceptional Children (DEC)

⁸ See: P.L. 108-446: Part A (Section 1452-1455), Part B (Sections 1461-1465), Part C (Sections 1471-1474), Part D (Sections 1481-1482)



Lakeshore Foundation
Learning Disabilities Association of America
National Association of Councils on Developmental Disabilities
National Association of School Psychologists
National Center for Learning Disabilities
National Disability Rights Network (NDRN)
National Down Syndrome Congress
National PLACE
TDIforAccess
The Advocacy Institute
The Arc of the United States
The Center for Learner Equity

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