

October 11, 2019

Dr. Mark Schneider
Institute for Education Sciences
550 12th Street, SW
Washington, DC 2002

Dear Dr. Schneider:

Advocates for Literacy is a coalition of over 60 organizations that understands the imperative role of literacy — reading and writing — in creating a globally competent workforce. The coalition is comprised of organizations representing teachers, parents, education researchers, unions, education publishers, nonprofits representing underserved populations and more. Advocates for Literacy supports comprehensive, birth through grade twelve literacy programs that focus on struggling students (below proficient). The Coalition works to ensure that literacy is a focus in federal education policy and advocates for increased federal resources to support states' and local educators' evidence-based practices.

The undersigned XX organizations are pleased to share our comments regarding potential research topics under the National Center for Education Research (NCER) and the National Center for Special Education Research (NCSEER).

Comments on Process

Earlier this year, the proposed priorities of the Institute of Education Sciences (IES) were published for public comment. However, the final priorities have not yet been shared publicly. It is unclear where IES is in the process of incorporating public feedback into its priorities and how this informal feedback activity will affect that process. We encourage IES to ensure that its process for gaining public input be transparent and that the final priorities be made public in the near future.

We also encourage IES to communicate clearly and widely the rationale and transition plan for any reorganization of topics. In previous outreach on requests for information outside of the Federal Register process, IES provided summaries of public comments from calls in 2014 on NCER and NCSEER Research Programs and in 2017 on Efficacy, Replication, and Effectiveness Studies. We ask that IES provides a similar summary of the comments received and indicates how the public response will inform future planning. Any significant changes made to the RFA structure should be clearly communicated with the grantee and stakeholder communities along with a crosswalk of affected and new topics.

General comments

We encourage you to use data to inform decisions about future RFAs and grant awards. Along with comments from the IES stakeholder community, we urge looking at data within each topic area — such as the number of applications submitted, awards granted, completion rates, outcomes and overall impact — to inform future competitions. We also encourage looking back at items that were not

competed in the FY 2020 cycle, such as research practice-partnerships and education leadership, to see how they can be integrated into future competitions.

Additionally, we encourage you to prioritize the dissemination of research and include in any future Requests for Applications (RFAs) a requirement to disseminate the research findings to a wide audience. Far too often, valuable research is conducted but never makes its way into the hands of the community and decision makers who can and should be using research to inform their work and improve policy and practice. Improved dissemination can occur through avenues such as partnerships with post-secondary educators, researchers and institutions, as well as through non-profit organizations.

Finally, we also wish to express concern regarding the annual funding provided to NCSER. In 2011 the NCSER funding was reduced by more than 30 percent - from \$71 million to \$54 million. Funding has remained at this reduced level in all subsequent years, with the 2019 appropriation at \$56 million. Meanwhile, the number of students identified for special education has increased in recent years — steadily each year since 2011. Literacy instruction is especially important for students with disabilities and research into how best to instruct and support them in this area is essential. We ask that IES seek to increase NCSER funding in order to restore it to near-2010 level.

Comments on ‘Short-term “off-cycle” competitions’

Advocates for Literacy has concerns and suggestions in response to your proposed RFA, ***“Systematic evaluation of widely used math and reading programs.”*** First, we encourage you to expand the focus from *“reading programs”* to *“literacy programs.”* The term *“literacy”* includes both reading and writing, which are essential skills for all students. The Every Student Succeeds Act also incorporates the term *“comprehensive literacy instruction,”* which is an evidence-based approach to literacy. Additionally, we would urge you not to focus on specific commercial literacy programs that might be widely used. Previous research examining popular commercial programs on the market has not had any discernible impact on the field and are unlikely to do so going forward. Instead, we urge you to focus the research on identifying common elements across literacy programs that are being used, determine which are proven to be effective for learning, and identify the factors on which schools are relying to make these choices.

Comments on NCER and NCSER “Verticals”

We encourage you to ensure that literacy continues to be a prominent and specific area of research in both NCER and NCSER. We also encourage you to fund programs that study effective approaches to literacy instruction and outcomes for students of all ages and within all student communities, including students with disabilities and English Learners.

Within the **Reading and Writing** vertical, we encourage you to consider funding research to identify or develop digital tools that can support student development of reading and writing skills. It is essential that we invest in research exploring the impact of networked environments and new digital tools on writing, both with an interest in how the practice of writing has changed in the digital environments that increasingly define modern work and academic environments and in the curricular implications of these changes. Research topics should include exploratory research to establish basic frameworks of understanding to capture the demands of rapidly changing digital environments, landscape studies that

establish current practice in schools and surface promising practices, and efficacy studies of existing curricula. An adjacent set of studies should examine the potential for digital tools to advance the teaching of writing with an emphasis on expanding equity and access to high quality instruction in writing.

Additional Research Topics

We encourage you to invest in research on ***Professional Development Related to Literacy Instruction***, a topic that has not been recently funded but would benefit the field greatly. IES should invest in research that evaluates existing professional development models to deliver literacy instruction and identify best practices for providing professional development that leads to effective instruction and improved student literacy. Even though research has clearly shown which evidence-based strategies can help struggling learners improve their literacy skills, far too many students continue to struggle. For example, more than 90% of students with learning disabilities are not proficient on the NAEP reading assessment. It is critical that educators and school professionals receive high-quality professional development to ensure that evidence-based practices are effectively carried out in classrooms across the country.

Thank you for considering our input as you prioritize research topics for the year ahead. Please feel free to contact the Advocates for Literacy Chair (Amanda Karhuse, NASSP, karhusea@nassp.org) or the Policy Development Committee Co-chairs (Meghan Whittaker, NCLD, mwhittaker@nclld.org or Dan Mangan, ILA, dmangan@reading.org) with any questions or for further information.

Sincerely,

Academic Language Therapy Association
ACT
Advocacy Institute
Alliance for Excellent Education
American Association of Colleges for Teacher Education
American Federation of Teachers
Association on Higher Education and Disability
Council of Administrators of Special Education
Council for Exceptional Children
Center for the Collaborative Classroom
EDGE Consulting
Education Northwest
Early Care and Education Consortium
Every Child Reading
First Five Year Fund
Grimes Reading Institute
Higher Education Consortium
HighScope Educational Research Foundation
Home Instruction for Parents of Preschool Youngsters (HIPPY)
International Dyslexia Association
International Literacy Association

Keys to Literacy
Knowledge Alliance
Learning Ally
Learning Disabilities Association of America
Literacy How, Inc.
National Adolescent Literacy Coalition
National Association of Elementary School Principals
National Association of ESEA State Program Administrators
National Association of School Psychologists
National Association of Secondary School Principals
National Association of State Boards of Education
National Association of State Directors of Special Education
National Black Child Development Institute
National Black Justice Coalition
National Center for Families Learning
National Center for Learning Disabilities
National Council of Teachers of English
National Down Syndrome Congress
National Down Syndrome Society
National Education Association
National Forum to Accelerate Middle-Grades Reform
National Rural Education Association
National Urban Alliance for Effective Education
National Women's Law Center
National Writing Project
Parents As Teachers
Reading Partners
Reading Recovery Council of North America
School Social Work Association of America
TASH
Teach Plus
TESOL International Association
The Arc