

October 15, 2025

Docket Number: ED-2025-IES-0844

The Honorable Linda McMahon
Secretary
U.S. Department of Education
400 Maryland Avenue, SW
Washington, DC 20202

Re: Comments on Request for Information; Feedback on Redesigning the Institute of Education Sciences (IES)

Submitted via <http://regulations.gov>

Dear Secretary McMahon,

The Wallace Foundation is pleased to submit the following comments in response to the request for recommendations on redesigning the Institute of Education Sciences.

The Wallace Foundation is a non-partisan, independent and endowed charitable foundation based in New York City. Through our work - across rural, urban, and suburban communities, and in states across the nation - we seek to develop and share research and evidence that can inform practice and policy in three areas: K-12 education leadership; youth development, including afterschool and summer learning; and the non-profit arts sector. We adhere to the principle "we say more, only as we know more," limiting any recommendations we make to what the evidence dictates. Our work in the K-12 sphere involves identifying pressing problems of practice, partnering with school districts and others to develop strategies for addressing those problems, and commissioning and later disseminating research that documents, details, and analyzes the impacts of these strategies to help inform the broader education field.

To continue to advance the use of evidence-based practices, first and foremost, we want to emphasize the importance of continued investments in federal research and data infrastructure to our education system and for our nation's future. In particular, IES's research investments are essential to building the evidence base that drives improvement in education. Our work with districts, states, and non-profit organizations often requires access to nationally representative datasets, longitudinal analyses, or large-scale impact evaluations - resources that IES is uniquely positioned to provide. For example, a recent synthesis of research on principals' effects on student learning finds that "over the past 20 years, education research has benefited substantially from federal and state investments in longitudinal data collection systems that track students and educators over time and link them for evaluation or research purposes. Studies of school principals have begun to take advantage of these data to rigorously estimate the impact of principals on various student outcomes, including test scores, school attendance metrics, and discipline outcomes."¹ Additionally, we rely on IES-funded research to inform

¹ Jason A. Grissom and Brendan Bartanen, [Strategic retention: Principal effectiveness and teacher turnover in multiple-measure teacher evaluation systems](#), American Educational Research Journal, 2019.

our strategy and investments, and we see firsthand how that research can lead to meaningful change when it is relevant, timely, and grounded in practice. As you begin the challenging work to redesign IES, we see this as an opportunity to expand research into additional areas, which we recommend below, and to break down silos and make research more relevant to the education field. Above all, we hope you continue to view federal research and development and the data and resources that result from these investments as a critical public good.

In addition to this broad recommendation, we offer the following recommendations related to each of the four priority areas requested in the notice:

1. How could IES prioritize and streamline federal data collections to balance burden and benefit?

The availability of timely, high-quality federal data has been essential to the work of researchers working with The Wallace Foundation - and to the broader education field. **While streamlining is important, it is essential that critical data be timely collected and reported to support research and actions in the field. In some areas, there are critical gaps in key areas of education data that should be rectified, including the need for more indicators and key metrics on school leaders and summer and afterschool enrichment programs.** For example:

- **Specific Recommendation:** Longitudinal data collection, which has long been supported by IES, should include school leader, as well as teacher and student data, so that the federal government and researchers can track if and how school leaders positively impact student level outcomes.

Rationale: There is a need for more robust data systems that connect student, teacher, and school leader data. Despite the evidence of the impact of effective principals, research has been constrained by the gaps in the data. Robust longitudinal data systems would allow researchers to analyze how teacher and leader job histories, certifications, and performance assessments relate to student learning outcomes, teacher retention, and other school level measures. Few states systematically track data on school principals in ways that can be used to analyze their impact on teacher retention and performance or on student achievement.

- **Specific Recommendation:** Longitudinal data collection should include data reporting on student participation in afterschool and summer academic and enrichment programs so that the federal government and researchers can track if and how these afterschool and summer programs positively support student outcomes.
 - Rationale: The Wallace Foundation has funded two synthesis reports, issued by the National Academies of Science, Engineering, and Mathematics, that summarize the impacts of summer and afterschool learning on students.^{2 3} Additionally, a Wallace-funded Tier II study led by RAND Corporation found that school districts that provided five-week summer programs balancing academics with enrichment positively supported

² National Academies of Sciences, Engineering, and Medicine, [*Shaping Summertime Experiences: Opportunities to Promote Healthy Development and Well-Being for Children and Youth*](#), The National Academies Press, 2019.

³ Moroney, D., & Nalamada, P. (Eds.), [*The future of youth development: Building systems and strengthening programs*](#), The National Academies of Sciences, Engineering, and Medicine, 2025.

student achievement.⁴ Yet, few districts track the afterschool and summer programs they provide, hindering the ability to fully understand the contributions the programs can make to student outcomes and to allocate resources accordingly.

2. How could IES leverage its grantmaking to advance impactful, practitioner-relevant research on pressing topics?

It is critical that IES-supported research produce actionable information for practitioners, and this should specifically include research about school leaders and leaders of youth development and out-of-school time programs.

- **Specific Recommendation:** IES should encourage research on principals, assistant principals, and other school leaders and their role in attracting and retaining high-quality teachers and promoting school and student success.
 - **Rationale:** Research has concluded that “the quality of a school’s leadership is among the most important predictors of teacher turnover.”⁵ What’s more, effective principals are also more likely to retain highly effective teachers, and to counsel out ineffective ones.⁶ Principals are also vital for recruiting and retaining high quality teachers from communities of color, whom research has shown can make a positive difference in the success of students of color.⁷

There is also strong evidence that principals and other school leaders play important roles in student success, school climate, and school outcomes; as a 2018 review of research found, “school leadership can be a powerful driver of improved education outcomes” and that “activities designed to improve school leadership demonstrate positive impact on student, teacher, and principal outcomes, based on research that is consistent with ESSA evidence tiers.”⁸ Research on an initiative funded by Wallace demonstrated that when six districts developed comprehensive and aligned processes to develop and support principals, students benefited. After three years, pipeline-district schools with newly-placed principals outperformed comparison schools in other districts by more than six percentile points in reading and almost three percentile points in math, based on a comparison of 1,100 pipeline schools with more than 6,000 comparison schools, with comparisons made within the same states; researchers noted that “we found no other

⁴ Augustine, C. H., McCombs, J. S., Pane, J. F., Schwartz, H. L., Schweig, J., McEachin, A., & Siler-Evans, K., [*Learning from Summer: Effects of Voluntary Summer Learning Programs on Low-Income Urban Youth*](#), RAND Corporation, 2016.

⁵ Jason A. Grissom, [*Strong principals retain effective teachers—and don’t retain ineffective ones*](#), Brookings Institute, 2018.

⁶ Grissom and Bartanen, [*Strategic retention: Principal effectiveness and teacher turnover*](#)

⁷ Jason A. Grissom, Anna J. Egalite, Constance A. Lindsay, [*How Principals Affect Students and Schools: A Systematic Synthesis of Two Decades of Research*](#), The Wallace Foundation, 2021

⁸ Rebecca Herman, et al, [*School Leadership Interventions Under the Every Student Succeeds Act: Evidence Review: Updated and Expanded*](#), RAND Corporation, 2018.

comprehensive district-wide initiatives with demonstrated positive effects of this magnitude on achievement.”⁹

- **Specific Recommendation:** Given evidence about the benefits of high-quality afterschool and summer learning, IES should strengthen and broaden the research base on the long-term contribution of out-of-school time activities to student achievement and other school-related outcomes. Although IES has frequently accepted studies related to afterschool and summer programming, few competitive applications have been awarded to date. We therefore recommend that IES issue a specific solicitation for studies related to district-based afterschool, summer, weekend, and year-round learning.
 - **Rationale:** Many studies demonstrate positive student impacts of district-based afterschool and summer programs but there is a need for more comprehensive and rigorous studies, including the impact across multiple years.¹⁰ A 2018 review, *Afterschool Programs: A Review of Evidence Under the Every Student Succeeds Act*, found “more than 60 programs with research evidence at Tiers I-III showing one or more improved outcomes for students... the programs improved a variety of outcomes, ranging from mathematics and reading/ELA achievement to physical activity/health, school attendance, promotion and graduation, and social and emotional competencies.”¹¹ Similarly, a 2019 review of summer learning programs, *Investing in Successful Summers: A Review of Evidence Under the Every Student Succeeds Act*, found that “summer programs can be an effective mechanism to address the needs of children and youth... including academic, social, and emotional needs” and that “there is evidence of effective programs offered to all grade levels.”¹² A separate study of five large school districts and their community partners that implemented voluntary summer learning programs found benefits after two summers in reading, math and social and emotional learning for students who attended consistently.¹³

A 2014 study by Child Trends found a 29-point gap in participation in out-of-school time activities by income, with 73 percent of those from families at or above 200 percent of the Free and Reduced Price Lunch income level participating – compared to 44 percent of those at or below that level.¹⁴ Duncan and Murnane have shown that families in the top income quintile spend almost seven times the resources on their children’s out of school

⁹ Susan M. Gates, et al., [Principal Pipelines: A Feasible, Affordable, and Effective Way for Districts to Improve Schools](#), RAND Corporation, 2019.

¹⁰ National Academies of Sciences, Engineering, and Medicine, *Shaping Summertime Experiences: Opportunities to Promote Healthy Development and Well-Being for Children and Youth*.

¹¹ Ruth Curran Neild, et al., [Afterschool Programs: A Review of Evidence Under the Every Student Succeeds Act](#), Research for Action, Abt Associates, McClanahan Associates, 2019

¹² Jennifer Sloan McCombs, et al, [Investing in Successful Summer Programs: A Review of Evidence Under the Every Student Succeeds Act](#), RAND Corporation, 2019

¹³ Catherine Augustine, et al., [Learning from Summer: Effects of Voluntary Summer Learning Programs on Low-Income Urban Youth](#), RAND Corporation, 2019.

¹⁴ Kristin Anderson Moore, et al., [Participation in Out-of-School time Activities and Programs](#), Child Trends, 2014.

time experiences than families in the bottom quartile.¹⁵ A National Academies of Sciences study on summer found differences in outcomes by community income level: “Summertime experiences can affect academic, health, social and emotional, and safety outcomes for children and youth, with those in disadvantaged communities at risk for worse outcomes.”¹⁶

- **Specific Recommendation:** There is a need to understand the role of the leader in supporting instructional uses of AI, as well as how to prepare and support leaders to do that work. Research on the use of AI among teachers and in classrooms should also include school leaders, since research shows that leaders are critical in instruction and operational activities.
 - Rationale: A 2021 study funded by the Wallace Foundation details how school leaders are key to teacher instructional practice.¹⁷

3. How could IES improve the reach and utility of evidence dissemination?

Even the most rigorous research has limited impact if it does not reach the people and organizations who can use it. The Wallace Foundation has partnered with coalitions that have invested in translating and disseminating evidence to practitioners and policymakers, and we have seen that this targeted, accessible dissemination across a range of modalities makes a measurable difference.

- **Specific Recommendation:** We encourage IES to focus on strengthening federal-level dissemination of research and evidence, particularly to reach district, school, and youth development leaders, including by diversifying modalities of dissemination.

4. How could IES support states and districts through more responsive technical assistance and capacity building?

Building a culture of evidence use across education systems requires more than data and research - it requires local capacity, ongoing support, and opportunities to learn from peers. IES is well-positioned to continue to lead in this area, particularly through the Regional Education Laboratories and other technical assistance programs.

The Foundation has funded state networks to learn about and apply evidence. For example, the ESSA Leadership Learning Community (ELLC) was a five-year venture to help foster effective principals. With representatives from eleven states meeting over a five-year period from 2016-2021, the ELLC led to a number of changes in practice.¹⁸ The Wallace Foundation also is currently funding RAND to interview state leaders to determine the types of technical assistance they need to enhance their use of evidence. We

¹⁵ Greg J. Duncan, Richard J. Murnane, [*Whither Opportunity? Rising Inequality, Schools, and Children's Life Chances*](#), Russell Sage Foundation, 2011.

¹⁶ Martín-José Sepúlveda and Rebekah Hutton (Eds), [*Shaping Summertime Experiences: Opportunities to Promote Health Development and Well-Being for Children and Youth*](#), National Academies of Sciences, Engineering, and Medicine, 2019.

¹⁷ Jason A. Grissom, Anna J. Egalite, Constance A. Lindsay, [*How Principals Affect Students and Schools: A Systematic Synthesis of Two Decades of Research*](#), The Wallace Foundation, 2021

¹⁸ [*All the Voices: Statewide Collaborations for School Leadership under ESSA*](#), The Wallace Foundation, 2022.

expect this study to be completed by Spring 2026 and we will share any specific, actionable findings and potential recommendations.

Thank you again for the opportunity to provide comments and recommendations. As you begin the important work to redesign IES, please know that The Wallace Foundation stands ready to serve as a resource to you and the Department.

Sincerely,

A handwritten signature in black ink, appearing to read 'B. Bevan'.

Bronwyn Bevan
Vice President, Research
The Wallace Foundation
bbevan@wallacefoundation.org