National Council on Measurement in Education Public Comment on Institute of Education Sciences Modernization

Submitted in Response to Department of Education
Request for Information (ED-2025-IES-0844)

October 8, 2025

The National Council on Measurement in Education (NCME) is pleased to respond to the Request of Information (RFI) issued by the Institute for Education Sciences (IES) of the U.S. Department of Education (ED). NCME applauds this IES effort to "maximize relevance, timeliness, and usability," and have "a meaningful, positive impact on students' academic achievement and other outcomes."

NCME is the nation's leading organization of scholars and professionals who advance the science and practice of educational measurement. NCME is a professional association for individuals involved in assessment, evaluation, testing, and other aspects of educational measurement. Members are involved in the construction and use of standardized tests; formative classroom assessments, new forms of assessment, including performance-based assessment; program design; and program evaluation. NCME members include university faculty; test developers; state and federal testing and research directors; professional evaluators; testing specialists in business, industry, education, community programs, and other professions; licensure, certification, and credentialing professionals; graduate students from educational, psychological, and other measurement programs; and others involved in testing issues and practices.

NCME is a non-partisan organization whose mission is to advance theory and applications of educational measurement to benefit society. Our members include professionals who work directly on educational assessments and other programs performed for, or funded by, IES and its Centers. We have shared the IES RFI with our members and have encouraged responses. NCME anticipates that our members and the organizations that employ them will contribute specific proposals for IES modernization in response to the enumerated priorities of the RFI. In our public response as a professional association, we chose to

focus on measurement-related priorities and highlight principles that should guide all efforts that IES pursues.

1. **Follow the law**

Every well-defined design challenge operates within explicit constraints, and for the modernization of IES, the relevant constraints include the laws that define, authorize, and fund the work of IES and its Centers. NCME's enthusiasm for the initiative toward modernization presumes compliance with applicable law and a commitment to meeting all statutory obligations. The Education Sciences Reform Act places specific responsibilities on ED that must be fulfilled before, during and after any modernization of IES. The Evidence Act and the OMB's Trust Regulation under that law establish requirements and supporting frameworks for ensuring that statistical agencies, including the National Center for Education Statistics produce relevant, timely, credible, accurate, and objective statistics that coincide with the expectation of data users, including the states. By ensuring that IES modernization innovates within legal boundaries, public trust in educational measurement can be preserved and strengthened.

2. **Uphold professional standards**

NCME has developed and published professional standards for educational testing for over 70 years. The current and freely available *Standards for Educational and Psychological Testing*, developed jointly with the American Educational Research Association (AERA) and the American Psychological Association (APA), reflect authoritative consensus. Staff and external experts well versed in these standards should be widely consulted as IES undertakes its modernization. Furthermore, NCME maintains a network of Technical Advisory Committee (TAC) members who are well versed in the applicable professional standards and who advise state agencies. Federal infrastructure supported by a modernized IES could strengthen professional practices and ensure that creative solutions to common testing problems do not remain siloed in individual states.

3. **Preserve and enhance the integrity of federal education data, assessments, and statistics**

The federal education surveys, including the National Assessment of Educational Progress (NAEP) and the National Assessment of Adult Literacy (NAAL), enjoy very high degrees of trust among policymakers, researchers, and the public. This trust has been built over decades through transparency, technical rigor, and consistent execution of inherently complex programs. Threats to this trust could arise from multiple directions, including data quality problems, methodological oversimplification, inadequate quality assurance within and across contractors, or political interference.

Identification and mitigation of such risks should be a primary consideration informing modernization efforts. The risks to federal education statistics are shared with other federal statistics and are well summarized, with concrete recommendations, by *The Nation's Data at Risk* published earlier this year by American Statistical Association and George Mason University.

NCES performs four foundational data collections that support numerous programs at federal, state, and local levels. The Common Core of Data (CCD), the Private School Survey, Integrated Postsecondary Education Data System (IPEDS), and the Education Demographic and Geographic Estimates (EDGE) program, must be accurate and up-to-date to enable the efficient sampling for all NCES assessments and surveys, including the National Assessment of Educational Progress (NAEP), and for many other legally required programs at state, federal, and local levels. As research priorities and educational practices change over time, it is crucial that the foundational data upon which educational measures rely be accurate and reliable in every sense.

In an educational landscape that includes many assessments, it is important to recognize and preserve the core qualities of NAEP. NAEP is an extraordinarily effective measurement program with remarkable efficiencies arising from its sampling of both students (minimizing intrusion into the educational process) and test items (ensuring broad coverage of educational topics within each assessment). This design requires appropriate statistical methodology and makes the NAEP assessment irreplaceable by any existing educational assessment program. Also integral to NAEP's effectiveness and sustained relevance is a robust portfolio of research activities that ensure innovation, rigor, and robust validity evidence.

4. Promote, encourage, and sponsor high quality education research

Professionals invested in the development of high-quality measures of educational achievement recognize that our work plays a crucial but only modest role in addressing the most important questions of education in a democratic society. We encourage serious scholarship in education and related disciplines and see an important role for the federal government and IES in particular in identifying, funding, and disseminating high quality research. We encourage research from a variety of perspectives and multiple disciplines, responsive to both enduring challenges and emerging opportunities.

We recognize and encourage any IES modernization initiative to respect the fundamentally different objectives that guide 1) the management of a dynamic portfolio of research projects aimed at addressing important scientific questions in education, and 2) the

construction, administration, and analysis of educational data and measures that inform research and public policy.

5. Invest in innovation, technical expertise and leadership

Measurement science is advancing rapidly due to innovations in technology (including Artificial Intelligence), constructs that predict labor market outcomes, and our understanding of how users, from the classroom to the legislature, interpret test scores. Further investment will advance the cutting edge of measurement science, including funding for "measurement methodology."

The pipeline of educational testing experts deserves continued investment to fulfill the goals of valid measurement and educational policy and program evaluation. NCME maintains a list of almost 100 Ph.D. programs in Educational Measurement in North America in schools and departments in education, psychology, and statistics. Research training grants in educational and psychological measurement will ensure that future measurement experts can support the measurement infrastructure necessary to improve American education.

To fulfil its existing obligations and to modernize effectively, IES and its Centers will require leadership with depth of experience and expertise in critical areas, including educational measurement, statistics, data science, artificial intelligence, and survey methods. Leadership that understands federal statistics and academic research will be especially important. A combination of strategic rehiring and new talent acquisition may provide the most effective approach. NCME recommends engagement with experts outside of ED in developing an appropriate recruiting and staffing plan.

6. Provide adequate resources, including technical staff, infrastructure, funding and oversight

Consistent delivery of reliable information on the condition of education in the United States relies upon a combination of individuals, processes, projects and data, each of which is vulnerable to disruption if not adequately resourced and systematically monitored. Prior to recent reductions, the National Center for Education Statistics (NCES) was noted as having an extraordinarily lean composition (i.e., staff-to-budget and staff-to-contractor ratios, as noted in the ASA/GMU report). We strongly encourage more robust resourcing of NCES and its programs to ensure predictable and trustworthy delivery of educational measurements and statistics, and to provide the bandwidth to effectively embrace the identified modernization opportunities.