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October 1, 2017

Joan McLaughlin, Commissioner, National Center for Special Education Research  
Thomas Brock, Commissioner, National Center for Education Research  
Institute of Education Sciences  
555 New Jersey Ave, NW  
Washington, D.C. 20208

Dear Commissioners McLaughlin and Brock,

I am writing on behalf of the Executive Board of the Council for Exceptional Children's Division for Research (CEC-DR). CEC-DR has over 1,000 members who are, as our mission states, devoted to the advancement of research related to the education of individuals with disabilities and/or who are gifted. The goals of CEC-DR include the promotion of equal partnership with practitioners in designing, conducting and interpreting research in special education.

CEC-DR greatly appreciates your invitation for input on its education and special education research programs, specifically related to Efficacy and Replication (Goal 3) and Effectiveness (Goal 4) research. We welcome this opportunity to offer our perspectives and recommendations that we believe will enhance the positive impact of IES-funded research activities, especially on educational outcomes for children and youth at risk or with disabilities.

To solicit as broad a view as possible from colleagues in the field conducting research in special education, CEC-DR sent a questionnaire that included IES's four guiding questions (listed below) to the following groups:

- CEC-DR members ( $n = 1052$ )
- Principal Investigators with Goals 2, 3, & 4 grant funding from NCSER in the last 10 years (non-overlapping with DR members;  $n = 126$ )
- Faculty affiliated with National Center for Leadership in Intensive Intervention (NCLII; non-overlapping with DR members;  $n = 15$ )
- We also encouraged all contacts in these lists to forward the questionnaire to other active special education researchers.

We received 61 responses to this survey. Of these respondents, 51 (84%) identified their role as faculty, 8 (13%) as researchers, 1 identified as a student and 1 identified as

“other” but did not specify his or her role. In addition, 41 (67%) reported that they have received IES funding, with the majority receiving either NCSEER funding ( $n = 21$ ; 51%) or both NCSEER and NCER funding ( $n = 17$ ; 41%). Types of funding spanned all five goals as well as early career and mentoring grants, PROMISE grants, partnership grants, an RTI center in early childhood, low cost-short duration, and NCEE contracts.

We compiled the resulting responses, identified themes that emerged, and translated these themes into recommendations, organized by IES’s four questions and summarized below.

## **1. What can IES do to encourage more visible and systematic replication research?**

Our primary recommendation is to *create a specific competition (separate from the Efficacy goal) or priority for funding replication research*. For example, IES could create a separate goal or special program devoted to replication studies that provides smaller amounts of funding (e.g., \$150,000 or less) and is open to any researcher (e.g., doctoral students, postdoctoral fellows, and new faculty/researchers). Such a program could include shorter review-to-funding cycles with more frequent competitions, allowing for more projects and a faster research to practice pipeline. At least some of this funding could target specific substantive areas identified as particularly promising practices, such as interventions shown to be efficacious in successful Goal 3 studies.

We also wish to underscore the importance of *ensuring that reviewers understand and value the purpose of replication research*. For example, IES could highlight replication as a priority, emphasizing that not all fundable research has to be completely novel to make important and meaningful contributions to the field. In addition, clearer replication research guidance could be included in the RFA to help both applicants and reviewers understand the types of research included in this category. IES guidelines could include information about the number and types of changes in replication studies (from the original), limits to such changes, and how to extend the generalization of research through replication in a systematic way.

Related to the above point, we recognize an ongoing need for *replication to be valued and prioritized in the field of education*. Part of this responsibility rests on the shoulders of researchers in the field (and can be carried out through activities such as the recent special issue of *Remedial and Special Education* focused on replication work). IES could further help to expand the discussion on the value of replication by creating a position statement about the importance of replication work, as well as spotlighting high-quality replication studies on the IES website, social media, and other public venues.

## **2. a. How can IES revise the current requirements for Goal 4 to encourage more effectiveness studies? Specifically, how important is the current requirement for an independent evaluation carried out by individuals who did not and do not participate in the development or distribution of the intervention?**

Whereas responses to our survey were somewhat mixed regarding this requirement, we generally recognize that an independent evaluation serves an important function in reducing bias. At the same time, we suggest IES *consider including a specific role for the original researcher/research team*. For example, the researcher could serve in an advisory role that is somewhat removed from the primary activities of the project but still allows for substantive input into the design and implementation of the study. In addition, we believe the *strength of the design* is probably at least as critical as the inclusion of an independent evaluator, and should remain a clear focus.

We also suggest that IES *consider the value that Goal 4 projects add over and above Goal 3 projects*. Rather than simply answering the question of whether an intervention can be taken to scale, we believe Goal 4 projects could offer the opportunity to explore interesting questions about *what it takes* to bring an intervention to scale (e.g., under what conditions and with what types of supports are innovations scalable; what degree of fidelity versus flexibility and adaptability are needed to ensure effectiveness). In this scenario, a collaboration between the original researchers and independent evaluators could be very valuable, as each would bring unique insights regarding implementation issues.

**b. Do we need a different definition of routine conditions?**

**c. What suggestions do you have for a new definition?**

Over half (64%) of respondents to our survey indicated that we do *not* need a different definition of routine conditions. While we generally believe that this definition is sufficient, we do recommend the RFA acknowledge what is “routine” will vary across classrooms, schools, and districts. Also (related to Question 2a), understanding variables that constitute “routine conditions” should be an important part of Goal 4 research.

- 3. a. Does IES pay sufficient attention to collecting and analyzing data on program implementation under the current research goal structure?**  
**b. How can IES better support this type of research?**

Over half (61%) of respondents indicated that IES *does*, indeed, pay sufficient attention to collecting/analyzing data on program implementation. We would, however, emphasize the importance of and need for high-quality approaches to measuring fidelity and other approaches to assessing implementation.

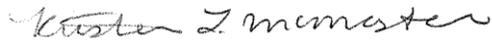
- 4. a. Does IES place enough emphasis on examining causal mechanisms and variation in impacts under the current goal structure?**  
**b. What can IES do to better support work in these areas?**

Over half (62%) of respondents indicated that IES *does*, indeed, place enough emphasis on examining causal mechanisms and variation in the current goal structure. To continue to support work in these areas, we recommend IES continue to support

and highlight Single Case Design as an important and viable design for examining causal mechanisms, particularly for low-incidence populations.

Again, CEC-DR is grateful to have the opportunity to provide comments related to IES's call for comments on the education and special education research programs. We would be more than happy to be involved in further discussions as you continue to consider potential changes to the research goals. Please do not hesitate to contact us; I can be reached via email ([mcmas004@umn.edu](mailto:mcmas004@umn.edu)) or phone (612-624-1859).

Sincerely,

A handwritten signature in cursive script that reads "Kristen L. McMaster".

Kristen L. McMaster, Ph.D.  
CEC-DR President