

October 15, 2025

Dr. Amber Northern U.S. Department of Education 400 Maryland Ave., SW Washington, DC 20202

Re: Request for Information; Feedback on Redesigning the Institute of Education Sciences (IES) [Docket ID: ED-2025-IES-0844]

Dear Dr. Amber Northern,

Thank you for the opportunity to provide feedback in response to the Department of Education's (the Department) request for public input on strategies to redesign the Institute of Education Sciences (IES). Arnold Ventures is a philanthropy dedicated to tackling some of the most pressing challenges in the United States. We invest in research to better understand the root causes of problems and build evidence about what works to inform policy solutions, particularly through rigorous, causal impact evaluations. Additionally, we work to identify, evaluate, and scale exceptional social programs that produce important improvements in people's lives, including in higher education and career pathways.

As a philanthropy that is dedicated to advancing the use of evidence in policymaking, we applaud the longstanding, invaluable role that IES plays in generating and promoting rigorous evidence-based policy. IES brings a commitment to scientific research principles and has served as a critical resource to help states, school districts, and institutions of higher education increase their focus on improving student outcomes and providing return on investment for students and taxpayers. As the Department considers strategies to redesign IES, it should keep a strong commitment to evidence-based education policy at the forefront of this effort. In service of this goal, we recommend that IES:

• Conduct rigorous research to build evidence for promising programs. Rigorous research increases the body of evidence about "what works," while shedding light on programs that do not demonstrate success. The history of rigorous program evaluations shows that surprisingly few interventions produce the hoped-for improvements in participants' lives. This is a pattern that occurs in higher education and social policy more generally, as well as in other fields like medicine and business. However, exceptional interventions that produce important improvements in people's lives do exist. Rigorous evaluations, including high-quality randomized controlled trials (RCTs) and well-designed quasi-experimental studies (QEDs), can be used to identify exceptional interventions that produce meaningful, sustained effects on student outcomes. It is imperative that IES continues to fund, conduct, and review high-quality education research, including RCTs, to deepen the field's understanding of which policies and programs are most effective across diverse settings. To ensure that IES research continues to meet a high bar for rigor, quality, and utility, IES should continue to abide by strong research standards, as required by the *Education Sciences Reform Act*, and should serve as the lead agency for all congressionally authorized evaluations of Education Department

¹ Citations to the relevant literature in social policy, medicine, and business are contained in "How to Solve U.S. Social Problems When Most Rigorous Program Evaluations Find Disappointing Effects (Part One in a Series)," Straight Talk on Evidence, Arnold Ventures, March 21, 2018, https://www.straighttalkonevidence.org/2018/03/21/how-to-solve-u-s-social-problems-when-mostrigorous-program-evaluations-find-disappointing-effects-part-one-in-a-series/.

² Education Sciences Reform Act of 2002, Pub. L. No. 107–279, § 102(18) – (20), 116 Stat. 1940 (2002). https://www.congress.gov/107/plaws/publ279/PLAW-107publ279.pdf

programs. Any dilution of standards would greatly undermine the commitment to science and practical knowledge-building that IES has exemplified since its founding and would hamper the agency's ability to equip lawmakers and other education leaders with necessary information to target limited resources to effective programs.

- Leverage research findings to inform policy decisions and scale proven programs. Very few evidencebased programs reach widespread adoption, and even fewer receive public support. Too often, public investments fail to prioritize or reward programs with evidence of impact, leading proven programs to serve only a small fraction of those who could benefit. To ensure that policy decisions are informed by rigorous research, IES should coordinate with other offices within the Department to design and implement grant competitions and other program initiatives that incentivize evidence-based spending such as the tiered-evidence approach in the Education Innovation and Research program. Additionally, IES can build upon the utility of one of its signature products: the What Works Clearinghouse (WWC). The WWC serves as an important online source for education research – filtering out lower-quality studies and emphasizing the highest-quality studies. To ensure the WWC is a timely and relevant source of information for states, school districts, and institutions of higher education, IES could improve the speed at which studies are reviewed and added to the database. For example, IES should continue to explore the use of "living evidence" reviews, which harness the expediency of new large language models (LLMs) to more quickly produce rigorous evidence syntheses that are up-to-date and responsive to decision-makers' needs. IES should also ensure that the WWC contains clear summaries of findings from reviewed studies that are written in plain language and accessible to a wide variety of stakeholders.³ This would necessitate that IES has sufficient staff and resources to effectively manage the WWC, and we encourage the Department to work with Congress to secure the necessary funds.
- Maintain robust federal data systems and infrastructure. High-quality data serves as the foundation for rigorous research and evaluation. The federal government is uniquely positioned to collect, standardize, and publish data that enables cross-state comparisons and plays an important role in building the capacity of states to collect and analyze their own data. Additionally, our ability to fund rigorous research as a philanthropy depends, in part, upon access to high-quality national datasets, including longitudinal data collections that span elementary and postsecondary education and workforce. We encourage IES to ensure that sustainable and appropriate data systems exist across disciplines by continuing to invest in the Statewide Longitudinal Data System program and by strengthening data partnerships across agencies.

Thank you for considering these recommendations to ensure that IES remains a leader in generating and promoting evidence-based policy. We welcome the opportunity to discuss these comments further. If you would like to have further discussion, please contact us at JMilner@arnoldventures.org and KMcManus@arnoldventures.org.

Sincerely,

Justin Milner
Executive Vice President of Evidence and Evaluation
Arnold Ventures

Kelly McManus Vice President of Higher Education Arnold Ventures

³ Anderson, David, Leya Mohsin, and Susannah Schoeffel, "Harnessing Innovation Implementing Living Evidence at the Institute of Education Sciences," Federation of American Scientists, April 2025, https://fas.org/wp-content/uploads/2025/04/Harnessing-Innovation-Implementing-Living-Evidence-at-IES.pdf.