



July 6, 2021

Shalanda Young  
Acting Director  
Office of Management and Budget  
Executive Office of the President  
1650 Pennsylvania Ave NW  
Washington, DC 20503

Re: 86 FR 24029 - Methods and Leading Practices for Advancing Equity and Support for Underserved Communities Through Government

Dear Ms. Young,

On behalf of the American Educational Research Association (AERA), thank you for the opportunity to provide feedback to the Request for Information (RFI) on Methods and Leading Practices for Advancing Equity and Support for Underserved Communities Through Government.

AERA is the major national scientific association of 24,000 faculty, researchers, graduate students, and other distinguished professionals dedicated to advancing knowledge about education, encouraging scholarly inquiry related to education, and promoting the use of research to improve education and serve the public good. In their work, many of AERA's members address persistent inequities in educational systems and seek to understand family, community, and economic structures that contribute to inequities. In working toward creating more equitable and inclusive educational systems, our members rely on federal data sets, including those collected by the National Center for Education Statistics (NCES), and receive research grants from federal agencies, including the Institute of Education Sciences (IES) and the National Science Foundation (NSF).

We greatly appreciate the leadership that the Office of Management and Budget (OMB) and the Biden administration are taking to help ensure that federal agencies are using an equity-focused lens in administering programs. The COVID-19 pandemic has exacerbated underlying disparities disproportionately experienced by traditionally marginalized populations inclusive of persons of color, persons with disabilities, and persons facing economic hardship. Our comments highlight promising practices in federal agencies that support the education research and statistical infrastructure and ongoing initiatives that could be bolstered to advance equity in recovering from the COVID-19 pandemic and fully addressing the impact of systemic racism.

## Area 1 – Equity Assessments and Strategies

*What are some promising methods and strategies for identifying systemic inequities to be addressed by agency policy?*

The Executive Order on Advancing Racial Equity (EO 13985) is an opportunity for OMB, the Domestic Policy Council, and other organizations, such as the Advisory Committee on Data for Evidence Building, to work collaboratively across federal agencies to identify and address inequities in educational access and outcomes across the lifespan. In order to determine the magnitude of systemic inequities and to inform an evidence-based response to address existing disparities, federal agencies need to have timely and relevant data.

Implementing recommendations from the National Academies of Science, Engineering, and Medicine report, [\*Monitoring Educational Equity\*](#), would serve as one starting point to expand ongoing data collections and link data among statistical agencies to identify disparities both in educational access and in contextual factors that influence educational outcomes. As examples, data on Head Start participation and early childhood assessment data from the Early Childhood Longitudinal Study-Kindergarten could provide insight on kindergarten readiness. Data on participation in other public programs such as the Supplemental Nutrition Assistance Program (SNAP) and Medicaid, as well as data on broadband access and food insecurity, can also contribute to understanding factors influencing academic outcomes and to addressing socioemotional needs.

As federal agencies implement the Foundations of Evidence-based Policymaking Act (Evidence Act), we see promise in the proposed development of a National Secure Data Service that will allow for linking existing education, health, and workforce data consonant with privacy protection and data security. Such connected information can inform comprehensive policy approaches that can contribute to equitable outcomes.

*How might agencies collect data and build evidence in appropriate and protected ways to reflect underserved communities and support greater attention to equity in future policymaking?*

Longitudinal data on education and workforce outcomes from NCES and the National Center for Science and Engineering Statistics (NCSES) have provided invaluable information highlighting trends in equity. These data are available to researchers in restricted-use form under agreements that protect privacy and confidentiality. As valuable as these data sets are to understand disparities that exist by race and ethnicity, disability status, and gender, improvements to these data can inform more timely guidance to address inequities.

As one example, the Civil Rights Data Collection (CRDC) within the Department of Education includes data on important educational indicators, including access to coursework, attendance rates, and suspension rates from all of the nation's schools and

districts. These data points are also disaggregated by race, disability status, and English learner status, which aid in the identification of disparities. The most recent full data from the 2017-2018 CRDC was initially released in October 2020.

To inform more timely guidance for schools, districts and states, we recommend that the Office of Civil Rights (OCR) in the Department of Education transition the CRDC from a biannual data collection to an annual collection. We also recommend that OCR release data on a more accelerated schedule. In order to achieve both of these goals, as noted in the FY 2022 budget request from the Department of Education, OCR requires both additional funding and staff capacity, in addition to its ongoing collaborative work with the NCES to improve data quality.

There are additional opportunities to include measures on surveys to identify disparities and inform equity-focused policy and practice:

- Department of Education
  - Continue to disaggregate data on in-person instruction, services such as afterschool and summer learning programs, and access to school counselors and other school health professionals by race/ethnicity on School Pulse Survey in transitioning from the NAEP 2021 School Survey.
  - Include data on LGBTQ+ status on NCES surveys.
  - Reinstate data elements on the 2020-21 CRDC that were proposed to be removed on teacher absenteeism, school finance, and number of first- and second-year teachers.
  - Reinstate and reconstitute the National Study of Postsecondary Faculty. This survey, last conducted in 2004, provided critical information on faculty in community colleges and Minority Serving Institutions that contribute to understanding the inequities among institutions traditionally seen as under-resourced. Revamping this survey would also provide data on disparities between tenure-track, non-tenure-track, and adjunct faculty.
- National Science Foundation
  - Include data on sexual orientation and gender identity on NCSES surveys, including the Survey of Earned Doctorates, National Survey of College Graduates, and Survey of Doctorate Recipients.
  - Incorporate data collection proposed in the NSF for the Future Act that would provide information on work-life balance and institutional supports for child care and course release by gender. The COVID-19 pandemic has exacerbated the struggles that women and particularly women of color face to attend to teaching, research, and service roles while also providing care for children and elderly family.
  - Encourage grantees to provide demographic data to enable understanding of potential disparities in awarded grants by race, ethnicity, gender, and their intersectionalities, providing assurances of data protection and use.

We also encourage the administration to support efforts to enhance data quality, including legislation such as the College Transparency Act that would allow for secure student-level data to be disaggregated in analyzing postsecondary and workforce

outcomes. The prohibitions on student-unit records in the Higher Education Act limit the capacity to track students and student-level educational outcomes and to examine intersections between race and ethnicity, gender identity, and degree type (as examples) where disparities may exist.

*How might agencies build capacity and provide training and support for teams conducting this work?*

We appreciated that the Federal Data Strategy Action Plan for 2020 included items for federal agencies to conduct a capacity assessment and identify opportunities to develop data skills among the workforce to align with agency needs. We encourage OMB to build on its leadership role on the Federal Data Strategy to present robust funding proposals for federal statistical agencies and to work with agencies to be as flexible as possible to hire staff to effectively collect and report data to inform equity strategies.

As one example, insufficient staffing has hampered NCES. To a far greater extent than functional, NCES has had to rely on contractors to conduct much of its survey work without adequate staffing in numbers (not in quality) to drive this activity. Unlike other statistical agencies that were able to pivot and shift priorities to address urgent data collection needs during the pandemic, NCES experienced limitations to innovate and shift to real-time data to be able to better understand conditions in schools and among students as they were happening.

## **Area 2 – Barrier and Burden Reduction**

We acknowledge that with the distributed nature of the U.S. educational system, there are barriers and burdens that are outside of the control of federal policy. For example, persistence in STEM degrees can be thwarted in postsecondary education due to introductory courses that are designed to “weed out” students in the absence of providing support and mentorship. Housing costs and the drawing of school boundaries can also present barriers to high-quality K-12 education. At the same time, federal agencies are engaged in reducing barriers and burdens – for example, the Pell grant provides the ability for low-income students to afford college. Even as federal agencies have sought to reduce barriers to educational access and opportunity, it is clear more work remains to create equitable and inclusive learning environments.

*How can agencies address known burdens or barriers to accessing benefits programs in their assessments of benefits delivery?*

As federal agencies implement the Evidence Act, the ability to link data has the potential to reduce burdens in applying for benefits programs or for grants. One example of ongoing work to reduce barriers to financial aid has been the linkage of data through the IRS Data Retrieval Tool with the Free Application for Federal Student Aid (FAFSA). Students applying for financial aid are able to use the tool to autofill questions related to income on the FAFSA. While the Department of Education is working to reduce questions on the FAFSA under the provisions of the Fostering Undergraduate Talent by

Unlocking Resources for Education Act, the IRS retrieval tool has served as one step to simplify the process for students seeking financial aid to attend a postsecondary institution. This tool could serve as a model for other benefits programs that include other data collected by federal agencies, under secure conditions that protect privacy.

*What data, tools, or evidence are available to show how particular underserved communities or populations disproportionately encounter these barriers? Which underserved communities experience multiple, cumulative barriers and are disproportionately burdened by specific administrative processes or requirements?*

Statistics collected by federal agencies can provide insight into barriers and burdens, including in education and in the development of the workforce. As mentioned previously, the CRDC provides disaggregated data on access to academic coursework such as AP courses, as well as access to school staff in K-12 education such as school counselors, social workers, and nurses. These data have highlighted disproportionate levels of suspension among Black students compared with other students, as well as the use of seclusion and restraint for students with disabilities.

Other data sets from NCES can also highlight disproportionate access to non-educational services, particularly for traditionally underserved groups. The [recent release of data](#) from the National Postsecondary Student Aid Study of 2020 (NPSAS:20) highlighted the impact of the pandemic on students in higher education. Some of these findings highlighted the difficulties that students of color and LGBTQ+ students faced as institutions transitioned to remote learning at the outset of mitigation strategies to slow the spread of COVID-19. As examples, Black, Latino, and Native American students were more likely to experience food insecurity than White students, while students identifying as non-binary experienced more difficulty in securing safe housing than students identifying as male or female.

State and district administrative data can also be used to determine barriers to educational services across the education lifespan. The State Longitudinal Data Systems (SLDS) program at NCES has supported the development of data infrastructure with K-12 data that have been able to be linked with state postsecondary, workforce, and other public service data. IES launched the Using Longitudinal Data to Support State Education Recovery Policymaking grant in FY 2021, with partnerships between state departments of education and researchers. Several FY 2021 awards are focusing on equity concerns, which will help inform state-level education policy decisions.

In addition, grants provided from NCES in the FY 2019 competition allowed for states to pilot a school-level poverty measure that would focus on geocoded student housing instead of participation in SNAP as a proxy for an indicator of poverty.<sup>1</sup> As the

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<sup>1</sup> A recent study that used data from the Missouri Department of Education highlighted some of the complications with using free-and-reduced price lunch as an indicator of poverty:

Department of Education and other agencies work toward a revised measurement of poverty levels, we encourage agencies to take into consideration students who are experiencing homelessness, foster children, and migrant students. Geospatial data can highlight aggregate and systemic issues that influence educational outcomes, but may leave out students who may be particularly underserved for services beyond education.

As important as administrative data systems have been to be able to examine intertwined aspects of equity among education, justice, health, and additional services, SLDS also has experienced limited funding, both from cuts to state budgets and from flat funding in recent federal appropriations. The research use of these systems has the potential to detail disparities that can inform policy solutions within state and local agencies. We encourage OMB to work with the Department of Education and Congress to boost the investment in SLDS, the capacity for SLDS to link across data systems, and researcher access and use. Additional resources will allow NCES to continue to support current grants in the field and to compete “off-cycle” grants that would address emerging equity issues.

*What types of overarching metrics (e.g., program uptake, over- or under-payments) might an agency use to measure a benefit program's outcomes [or whether it is implemented as intended]??*

In evaluating the success of federal programs in working toward equitable outcomes in education and for the STEM educator and researcher workforce, we encourage the use of multiple, holistic measures. An example of data that highlight educational and socioemotional outcomes is the National Assessment of Educational Progress (NAEP) to understand the national perspective on achievement gaps across race and gender. Additional data from the American Community Survey and the Survey of College Graduates can also provide information on future outcomes.

In addition, evaluations conducted by the National Center for Education Evaluation (NCEE) within IES have also provided insight into the outcomes of programs. Worthwhile activities include set-aside funding provided in the Every Student Succeeds Act (among other laws) and NCEE’s authority to conduct evaluations to understand whether programs supported with federal funding lead to equitable outcomes.

#### **Area 4 – Financial Assistance**

*What are promising practices for equitable grantmaking and the administration of financial assistance programs that agencies should consider in the course of their equity assessments?*

We can point to several ongoing examples that are working to increase diversity and inclusion in the education research pipeline through direct support and additional efforts

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<https://caldercenter.org/publications/free-and-reduced-price-meal-eligibility-does-not-measure-student-poverty-evidence-and>

to encourage collaboration with Minority Serving Institutions (MSIs). The [Pathways to the Education Science Research Training](#) program at IES provides grants for MSIs to provide students in undergraduate and master's degree programs education research experiences and mentorship. Students from traditionally underrepresented groups who participated in programs [supported by Pathways training grants](#) have gone on to pursue doctoral degrees in education research and seek to apply their skills to address equity in education.

Within NSF, the [Build and Broaden](#) program within the Social, Behavioral, and Economic Sciences (SBE) Directorate is funding capacity-building activities that require collaboration with MSIs. Build and Broaden is seeking to increase applications and eventual funding of grants to MSIs that involve the social and behavioral sciences. In addition, the [Racial Equity in STEM](#) program in the Education and Human Resources (EHR) Directorate is seeking to create partnerships with underrepresented groups in STEM to increase diversity and equity in the STEM workforce.

In addition to those initiatives, programs such as the [Robert Noyce Teacher Scholarship](#) program are working toward further diversifying the STEM teacher workforce and providing mentorship to students interested in STEM. The Noyce program has also resulted in producing evidence-based resources and tools that are culturally and linguistically responsive and that support inclusive STEM learning environments.

*What kinds of training and capacity building within agencies would support equitable grantmaking and financial assistance efforts?*

NSF has sought to address disparities in the research workforce through the development of grant competitions with the goals of improving institutional capacity and broadening participation. The NSF INCLUDES initiative has grown to include alliances and a national coordination hub to create shared measures, develop resources that highlight evidence-based practices to increase STEM engagement for underrepresented populations, and to scale programs that have shown success to increase STEM engagement, access, and persistence. Alliances awarded funding under NSF INCLUDES have focused on providing STEM educational programming in prison settings, building STEM capacity in community colleges, and developing inclusive admissions practices.<sup>2</sup>

*What kinds of data should agencies collect and use to assess equity in their grantmaking and financial assistance practices?*

Over the past year, the Broadening Participation Subcommittee of the NSF EHR Advisory Committee has examined ways to measure the success of broadening participation programs in NSF. The subcommittee analyzed demographics and outcomes (e.g., success in receiving future NSF grants, publications) using a 10-year-

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<sup>2</sup> Examples of grants supported under NSF INCLUDES are noted in the Special Report to the Nation II: <https://www.nsf.gov/pubs/2020/nsf20099/nsf20099.pdf>



period of EHR CAREER grantees as a model to potentially expand to other NSF programs. A preliminary analysis of the awards provided from the EHR Directorate through the CAREER program has highlighted the limited grant funding provided for persons with disabilities and Native American researchers. However, 20 percent of CAREER grantees within EHR did not provide their demographic information, limiting the ability to accurately assess the current state of equity in grant awards.

The need for data (and to encourage applicants to provide them) is more broadly the case beyond NSF CAREER applicants. NSF makes funding decisions and awards based on peer review. Data are examined in program oversight review to identify potential inequities, but they also could be used more routinely to examine issues of equity and encourage researchers who are underrepresented in grant applications or proposals. For IES, too, while there is a requirement to select an option for demographic information in submitting grant applications, many choose the option in response to that question that they prefer not to disclose.

Scientific agencies should take steps, including partnering with stakeholder communities, to encourage grantees to provide demographic information on a voluntary basis. These efforts would help agencies better assess whether there are certain groups that are underrepresented in grant success, measure the effectiveness of programs that seek to increase equity and diversity, and understand the long-term impacts of broadening participation programs on researchers' abilities to receive additional research grants.

## **Area 5 – Stakeholder and Community Engagement**

*What practices should agencies put in place to reach underserved communities in rural areas or underserved communities that otherwise are not able to visit Washington, DC, to engage with policymakers?*

The federal government has supported partnerships to build upon the expertise of local communities to inform evidence-based practice to address equity. As one example, the Regional Educational Laboratories (REL) involve research-practice partnerships that include the participation state departments of education, school districts, and research partners to meet regional needs. As one example of addressing rural needs, REL Central supports the [Rural Education Research Alliance](#), which focuses on two important issues rural districts face, teacher recruitment and retention and closing the achievement gap. Projects in Colorado and North Dakota are respectively examining the role that incentives of stipends and student loan forgiveness have in attracting teachers to rural districts. Employing partners such as RELs can connect evidence-based practice while reflecting community perspectives.

We also see value for federal agencies to specifically target some grant funding to institutions in rural areas to build the educator and scientific workforce. As one example, the Established Program to Stimulate Competitive Research (EPSCoR) program within NSF is directed to institutions within states that receive less than 0.75 percent of the



total NSF budget in awards. Many of the states that are eligible for ESPCoR also have large rural footprints. These awards are intended to build research capacity for institutions as well as boost economic development. We are pleased to see the recent [NSF Dear Colleague Letter](#) detailing EPSCoR grants that will involve Minority Serving Institutions as an additional initiative to broaden participation and increase diversity in the STEM educator and scientific workforce.

Thank you once again for the opportunity to provide information to inform the federal government's efforts to ensure that equity is at the forefront of programs. Please do not hesitate to call upon AERA if we can be helpful in connecting with stakeholders or to provide additional information that can help inform the implementation of Executive Order 13985.

Sincerely,

A handwritten signature in black ink, appearing to read 'Felice J. Levine'.

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