



October 15, 2025

Dr. Amber Northern, Senior Advisor
Office of the Secretary
U.S. Department of Education
400 Maryland Avenue SW
Washington, DC 20202

CC: Dr. Matthew Soldner, Acting Director, Institute of Education Sciences and Acting Commissioner, National Center for Education Statistics

Re: Docket ID number ED-2025-IES-0844

Dear Dr. Northern,

On behalf of the Association for Institutional Research (AIR), we appreciate the opportunity to provide feedback on the *Request for Information on Redesigning the Institute of Education Sciences (IES)*. AIR's recommendations focus on the postsecondary collections administered by the National Center for Education Statistics (NCES) and share a common goal: preserving the integrity, utility, and accessibility of federal education data to support educational opportunity, accountability, and continuous improvement.

As the professional association representing institutional research, institutional effectiveness, and other data professionals across higher education, AIR brings the perspective of those who are both contributors to and users of the IES postsecondary data collections—particularly the Integrated Postsecondary Education Data System (IPEDS) and longitudinal sample surveys—and have firsthand experience with how federal stewardship, data quality, and timely access translate into institutional insight and informed decision-making.

Drawing on this expertise, AIR recognizes the essential role of IES and its centers—particularly NCES—in providing the trusted, high-quality data that form the foundation for educational research, policy, and institutional improvement. Maintaining the strength and independence of these agencies is critical to ensuring that education decisions at every level remain grounded in evidence, not assumption.

The following recommendations outline practical steps to strengthen IES and NCES and ensure that postsecondary data collections remain reliable, relevant, and publicly accessible.

1. Preserve Federal Stewardship and Independence of Education Data

Ensuring that NCES and its core federal data collections remain under federal stewardship—not privatized or shifted to state control—is essential to maintaining a trusted national education data system. The federal government provides the only mechanism for producing comparable, comprehensive, and publicly accessible data across all states and sectors. Retaining NCES within the federal system safeguards data quality, transparency, and independence under established statistical standards and ensures that national education data remain objective and available for public use at no cost.

2. Ensure Stable, Adequate Funding for Core IES Functions

Sustained, multi-year funding for survey operations, modernization projects, and technical staff is essential to maintaining data quality and timeliness. Proposed FY2026 reductions would severely limit NCES's ability to conduct core surveys and maintain longitudinal datasets. Unstable funding disrupts historical trend lines, reduces comparability, and weakens confidence in the reliability of federal data. Without consistent investment, the nation's education data infrastructure will fragment, constraining the ability of policymakers, researchers, and institutions to make evidence-based decisions.

3. Reinstate and Modernize Longitudinal Sample Surveys

Restoring regular cycles of the National Postsecondary Student Aid Study (NPSAS) and the Beginning Postsecondary Students (BPS) study is essential to maintaining a continuous national picture of affordability, access, and student outcomes. These data illuminate how federal and institutional policies affect affordability, persistence, and student success—insight that cannot be replicated through administrative sources alone.

Developing a new longitudinal study to replace the discontinued Baccalaureate and Beyond (B&B) study—expanded to include completers at all credential levels—would provide a more complete view of today's educational pathways and transitions into the workforce. Tracking outcomes for students earning short-term credentials, certificates, associate degrees, and bachelor's degrees would deepen understanding of how varied educational experiences translate into opportunity and mobility.

4. Leverage Existing Administrative Data and Strengthen Cross-Agency Partnerships

IES can build on models such as the College Scorecard to link postsecondary data with administrative datasets from other federal agencies including the Internal Revenue Service (IRS), the Social Security Administration (SSA), the Department of Veterans Affairs (VA), the Department of Labor (DOL), and the U.S. Census Bureau to enhance accuracy, reduce costs, and allow the same verified data to serve multiple public purposes. Expanding these linkages would also reduce institutional reporting burden while improving analytic value across federal and state systems.

Connecting postsecondary and workforce training systems would better reflect learner mobility and capture transitions between education and employment. Aligning education and labor market data helps federal and state policymakers, researchers, and institutions understand how credentials translate into workforce outcomes and regional economic needs, while clear interagency agreements protect privacy and security.

Providing aggregated, de-identified data back to states and institutions would strengthen benchmarking and improvement efforts. Access to comparable, high-quality data enables leaders to evaluate progress, identify gaps, and align programs with national priorities for developing a knowledgeable and skilled workforce.

5. Rebuild NCES Capacity and Expertise

Rebuilding NCES's internal analytic, technical, and program management capacity is essential to maintaining data integrity, ensuring timely public access, and fostering innovation in data tools and visualizations. Federal staffing reductions and contractor terminations have weakened NCES's ability to manage complex data systems and sustain the reliability that is expected of federal statistical agencies. Restoring core staff—particularly

survey directors and technical experts—will reinforce accountability for data quality, uphold consistent standards, and improve communication with the field.

6. Foster Collaboration and Technical Assistance

Strengthening collaboration and technical assistance across the education data community will ensure that modernization efforts remain practical, transparent, and grounded in real-world use. Reestablishing partnerships such as the National Postsecondary Education Cooperative (NPEC), Technical Review Panels (TRPs), and IPEDS training programs would restore valuable channels for practitioner input and build shared understanding of reporting standards, data use, and quality improvement. Co-designing new or expanded collections with data professionals and researchers will enhance feasibility, safeguard privacy, and improve the accuracy and consistency of institutional reporting.

Conclusion

IES's mission is critical to providing national leadership in expanding knowledge and understanding of education through accurate, reliable, and readily accessible information for students, families, researchers, policymakers, and the public. As the Department considers modernization options, reforms must strengthen IES's capacity, independence, and role in providing the high-quality data that underpin educational opportunity and improved outcomes. AIR remains committed to working with the Department and the education community to shape a strong, trusted, and forward-looking IES.

Sincerely,

A handwritten signature in black ink that reads "Christine M. Keller". The signature is fluid and cursive, with the first name "Christine" being the most prominent part.

Christine M. Keller, Ph.D.
Executive Director & CEO
Association for Institutional Research