



**CONSORTIUM FOR CITIZENS
WITH DISABILITIES**

October 8, 2019

Dr. Mark Schneider
Institute for Education Sciences
550 12th Street, SW
Washington, DC 2002

Dear Dr. Schneider:

The Consortium for Citizens with Disabilities (CCD) is the largest coalition of national organizations working together to advocate for Federal public policy that ensures the self-determination, independence, empowerment, integration, and inclusion of children and adults with disabilities in all aspects of society. The Education Taskforce of CCD works to ensure that students with disabilities have every opportunity to succeed in school and beyond. We appreciate the opportunity to weigh in on the future work of the Institute of Education Sciences (IES).

A robust federal investment in research is critical to understanding and serving the academic, social, emotional, and behavioral needs of students with disabilities and equip educators to effectively serve them and partner with their parents/caregivers. As such, we are encouraged by this review of priorities and consideration of how to best allocate available funding. We ask you to consider the following questions in comments in response to your solicitation for feedback.

General Comments on Process

In May of 2019, IES was collecting public feedback on priorities research priorities for the agency. However, the final priorities have not yet been shared publicly. It is unclear where IES is in the process of incorporating public feedback into its priorities and how this informal feedback process will affect that process. We encourage IES to ensure that its process for gaining public input be transparent and that the final priorities be made public in the near future. Additionally, we encourage IES to communicate clearly and widely the rationale and transition plan for any reorganization of topics.

Finally, we encourage you to use evidence and data to inform decisions about future RFAs and grant awards. Along with comments from the IES stakeholder community, we urge looking at data on each topic area – such as the number of applications submitted, awards granted, completion rates, outcomes and overall impact – to inform future competitions. We also encourage looking back at items that were not competed in the FY 2020 cycle, such as research practice partnerships and education leadership, to see how they can be integrated into future competitions.

Comments on 'Short-term "off-cycle" competitions'

In general, we would be interested to know how much of the money available for this year's grant funding would be spent on these off-cycle grants. While they are interesting and worthwhile topics, they should not come at the expense of funding for studies in other established research areas.

1. *Using state longitudinal data systems to measure long-term outcomes.*

The use of state-longitudinal data systems to measure long-term outcomes sounds promising, and it would be an incredible benefit to track the impact of interventions in the long-term. Such long-term measures would allow researchers, advocates, policymakers and others to have access to a range of critical data that can be used to inform policy making, budgeting, instructional practice and more. However, it is unclear what changes might need to be made to the existing data collection system in order to begin gathering data specific to those students in treatment groups, or whether this type of analysis can be done immediately based on information already available.

We encourage IES to include in future RFAs using longitudinal measures a requirement that student outcomes be disaggregated by disability type and other subgroup characteristics, such as race, ethnicity, and English learner status, so as to inform policy and practice decisions. We also encourage IES to include in future RFAs incentives for researchers to track educational progress of students in traditional public schools and charter schools, including charter schools which are their own LEAs. This characteristic greatly influences the provision of special education and related services.

2. *Using NAEP process data.*

We strongly support the release of this RFA. The NAEP data set can yield an incredible amount of information about how students work their way through the assessment. This data can, in turn, have implications for assessment development and can lead to increased accessibility for students. However, it is important to note that students with the most significant cognitive disabilities who are assessed via the state alternate assessment do not participate in NAEP and additional efforts should be made to study the assessment process for students who do not participate in NAEP.

Comments on NCER and NCSE "Verticals"

1. ***Career and Technical Education:*** With the recent reauthorization of the Perkins Career and Technical Education Act, there is a new set-aside for the recruitment of individuals with disabilities to CTE programs that lead to high-wage in-demand careers. It also includes provisions around public reporting on student subgroups and special population performance by program of study and includes efforts to expand access and requirements for teacher professional development in Universal Design for Learning and other research-based teaching methods. As a result, increasing efforts will be made to more meaningfully engage, enroll, and serve students with disabilities in CTE programs. However, little is known about how many students with disabilities are enrolled in CTE programs and how they are being served. IES should invest in research that examines distribution of students with disabilities in different programs of study by disability category, specifically looking to see whether there is over- or under-representation and why, and by race/ethnicity within each disability category. This type of research will allow us to know whether changes made under the new law are effective in enrolling and serving more students with disabilities, including those from

the most underserved racial/ethnic backgrounds.

2. ***Student Learning and Cognition:*** New research in this area should focus specifically on how to support the progress of students with disabilities – and particularly students with significant cognitive disabilities – in the general education curriculum and within the general education classroom. While we have multiple studies that describe the effectiveness of evidence-based strategies for students with significant cognitive disabilities in regular class settings (Collins et al., 2007; Jameson et al., 2008; Jiminez et al., 2012; McDonnell et al., 2002; McDonnell et al. 2006), these have been done in a limited number of classrooms with a relatively small number of students (Hudson et al., 2013). Though it is important that this line of research expand to include students at all grade levels and content areas, perhaps most needed are those studies that show how schools, districts, and whole states can take these strategies to scale.
3. ***Transition Outcomes for Secondary Students with Disabilities:*** Outside of the National Longitudinal Transition Study, there is little to no reliable data on outcomes for students with disabilities once they leave high school. We encourage IES to maintain this vertical as a priority.

Additional Research Topics

The following research topics have not been recently funded but would benefit the field greatly:

1. **We urge IES to complete the research that is required under section 664(c) of IDEA.** Under IDEA, IES is required to conduct a national study or studies related to students with disabilities who take alternate assessments. In particular, IES is responsible for carrying out a national study or studies that examine (1) the criteria that states use to determine eligibility for alternate assessments and the number and type of children who take those assessments and are held accountable to alternate achievement standards; (2) the validity and reliability of alternate assessment instruments and procedures; (3) the alignment of alternate assessments and alternate achievement standards to state academic content standards in reading, mathematics, and science; and (4) the use and effectiveness of alternate assessments in appropriately measuring student progress and outcomes specific to individualized instructional need. In addition to meeting this requirement under law, we encourage IES to examine the **performance of students with the most significant cognitive disabilities on states' alternate assessments aligned with alternate academic achievement standards and whether there is any relationship between students' assessment performance and their educational setting.**
2. **We strongly encourage IES to fund an update of the 2013 NCEE study, *The Inclusion of Students with Disabilities in School Accountability Systems*** (<https://ies.ed.gov/ncee/pubs/20134017/>). This information is urgently needed given the new state accountability systems that are now in place as required by the Every Student Succeeds Act and as advocates and the public seek to understand how those accountability systems are impacting students with disabilities.
3. **We encourage IES to examine the impact of funding policies on special education practice.** In the field, we continue to rely on a 20+ year old study conducted by Dr. Tom Parrish in 2000 (See: http://www.casecec.org/documents/JSEL/JSEL_14.1.pdf). To date, the U.S. Department of Education has not funded a reliable examination of federal, state and local funding practices related

to students with disabilities including the impact of funding policies in the states with charter schools.

In all areas of research, **we urge you to invest in robust dissemination efforts**. Far too often, valuable research is conducted but never makes it way into the hands of the community – including families, family-led organizations such as Parent Centers, advocacy groups, and the wider public – and decision makers at local, state and national levels who can and should be using to research to inform their work. IES must ensure ready access to timely data and support secondary analyses. By investing in dissemination of data, the Department can optimize the value of the data collected by ensuring researchers and policy makers can analyze the data to answer critical questions and inform policy.

We also wish to reiterate our ongoing **concern regarding the annual funding provided to NCSER**. In 2011 the NCSER funding was reduced by more than 30 percent - from \$71 million to \$54 million. Funding has remained at this reduced level in all subsequent years, with the 2019 appropriation at \$56 million. Meanwhile, the number of students identified for special education has increased in recent years - steadily each year since 2011. We ask that IES seek to increase NCSER funding in order to restore it to near-2010 level.

We appreciate the opportunity to provide comments and share our recommendations relating to potential future research opportunities from the Institute of Education Sciences (IES). We would be happy to speak further or answer questions about our recommendations and look forward to continued advancements through research.

On behalf of the CCD Education Task Force,

Annie Acosta, *The Arc*

Laura Kaloi, *Council of Parent Attorneys and Advocates & The National Center for Special Education in Charter Schools*

Amanda Lowe, *National Disability Rights Network*

Kim Musheno, *Autism Society of America*

Meghan Whittaker, *National Center for Learning Disabilities*