



National Education Knowledge Industry Association

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James W. Kohlmoos
President

February 23, 2007

The Honorable Margaret Spellings
U.S Department of Education
Via email stratplancomments@ed.gov

Dear Secretary Spellings:

In reference to your request of February 5, 2007 for public comment on the “Strategic Plan 2007-2012: Draft for Public Comment”, I am pleased to submit the following comments on behalf of the National Education Knowledge Industry Association.

Keep focus on improving achievement for all students --- We applaud your focused attention in Goals 1 and 2 and their corresponding objectives on improving results in k-12 education. This is consistent with the overall goals of equity and excellence of the Elementary and Secondary Education Act and deserves to be a top priority in this strategic plan.

Add strategies for building state and local capacity for school improvement--- We are surprised by the limited focus in the strategies for Goals 1 and 2 on building the capacity of state and local educational agencies in school improvement. In the President’s FY 2008 it was noted that “ Rising numbers of schools (not making adequate yearly progress) will place even more pressure on the limited state-level resources currently available for school improvement...(there is) growing demand for the more comprehensive improvement measures...” States and localities not only need additional resources but also advanced expertise and research-based knowledge infrastructures for turning around low performing schools. We urge you to give greater attention to capacity building and technical assistance for states and localities in the plan.

Add goal for transforming education into an evidence-based field --- In the previous strategic plan one of the key goals (Goal #4) was the priority effort to transform education into an evidence-based field. We are deeply disappointed that this goal was discarded in this draft. Given your projections about the dramatic increase in demand for comprehensive school improvement support, never has the need been greater for the

research and development enterprise to deliver rigorously developed and relevant solutions to the achievement problems faced by schools nationwide. It is critically important at this stage in the implementation of the No Child Left Behind Act that research-based knowledge derived from the best available empirical evidence is developed, transferred and applied to the key issues in policy and practice at all levels. We urge you to reinstate the goal of evidence and knowledge utilization.

Add management objectives for coordinating the research and development enterprise with school improvement efforts--- We note the “cross-goal strategy on Management” makes no mention of any systems for coordinating key activities across the Department’s principle offices. In particular, we are concerned about the potential isolation of the Institute of Education Sciences (IES) from the other principle operating components concerned with school improvement and technical assistance. While it is important for a research and development enterprise such as IES to maintain a reasonable degree separation, it remains essential to build a system focusing on the use of evidence and research-based knowledge from which all the program offices can benefit in administering their programs. We suggest establishing an objective to address this critical management issue.

Thank you for allowing us to submit our comments. We hope that you will take them into consideration in refining your draft plan. We would please to address any questions you might regarding these comments.

Sincerely,

A handwritten signature in cursive script, appearing to read "Jim Kohlmoos".

Jim Kohlmoos