



National Education Knowledge Industry Association

1718 Connecticut Avenue, NW Suite 700
Washington, DC 20009
(202) 518-0847
Kohlmoos@nekia.org

James W. Kohlmoos
President

Elizabeth Payer,
U.S. Department of Education,
555 New Jersey Avenue, NW., Room 602c,
Capitol Place, Washington, DC 20208.
Sent via email elizabeth.payer@ed.gov

Dear Ms Payer:

On behalf of the National Education Knowledge Industry Association (NEKIA), I am pleased to respond to the Federal Register Notice of July 3, 2006 inviting comments on the plan of the Institute of Education Sciences for addressing the long-term research priorities approved by the National Board for Education Sciences. We appreciated the opportunity to respond to the Institute's priorities last year and we are now pleased to provide our reactions and ideas regarding the Institute's plan for implementing the priorities.

The three elements provide a limited but sound framework for analysis --- The three elements are a sound way of analyzing how research grants relate to the priorities. The logical sequence of the elements provides a framework for understanding current grants and for modifying, if necessary, future competitions. We suggest that the plan describe in more detail the process the Institute will use to make adjustments should there be gaps in addressing the priorities. We suggest that an annual report be submitted to the Board detailing the gaps and corrective action that will be undertaken to bridge the gaps.

The relevance and utilization of research should be a fourth element for analysis --- While we agree with the three sequential elements, these criteria do not fully capture the fundamental issue of relevance on which the Board has focused much attention during the past two meetings. We suggest that the plan contain an on-going strategy for both ensuring that the research projects are relevant to practical issues of concern to states and districts nationwide and promoting the use and application of the findings. We recognize the difficulty and complexity in adding this element to the plan but we believe that the plan's significance will be diminished without it.

The plan needs to be more dynamic and proactive --- In its current form, plan tends to emphasize a reactive analysis to grants that have already been competed. We suggest that the plan contain dynamic and proactive strategies for generating new knowledge through rigorous research and promoting the use of knowledge-based solutions in policy and practice. This may already be the intent of the Institute but it is not fully manifested in the current plan.

The plan should include a strategy for enhancing the capacity and infrastructure within the Institute and the research community --- We believe that the capacity to implement the priorities in terms of funding, infrastructure and expertise is a fundamental issue for the future development of the federal research enterprise. Unfortunately the proposed plan does not address issues of capacity within the Institute or in the field. Any plan related to implementation should contain at the very least an analysis of internal and external capacities and a practical time line and budgetary projection for getting the job done. We suggest that these important components be included in the plan.

The plan should address how the Institute will coordinate with the rest of the Department of Education. We applaud the ground breaking leadership and accomplishments of the Institute over the past four in helping to transform education into an evidence-based field. As the Institute has moved forward in promoting rigor and relevance in the research enterprise, other parts of the Department have also developed new efforts related to improvement and innovation at the local and state levels including the new comprehensive assistance centers and the new Promising Practices Initiative. To maximize the potential for fulfilling the Institute's priorities we believe that extra attention needs to be given to coordination and collaboration within the Department. We suggest that the plan include a section on this topic.

We hope that these comments will be beneficial as you move forward in finalizing the plan. We have very much appreciated the opportunity to submit these ideas. Should you have questions or comments about these ideas, please do not hesitate to contact me.

Sincerely



James Kohlmoos
President, NEKIA