



October 15, 2025

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

Docket ID ED-2025-IES-0844

Dear Ms. Northern:

On behalf of the National Association of Student Financial Aid Administrators (NASFAA) and our 3,000 member institutions, we respectfully submit to the U.S. Department of Education (ED) our comments on its Request for Information; Feedback on Redesigning the Institute for Education Sciences (IES) (Docket ID ED-2025-IES-0844).

NASFAA represents nearly 29,000 financial aid professionals who serve 16 million students each year at colleges and universities in all sectors throughout the country. NASFAA member institutions serve nine out of every 10 undergraduates in the U.S.

Understanding that the work of IES extends far beyond research and evaluations related to the federal student aid programs, given our expertise on research and evaluations related to the federal student aid programs, we have focused our comments on this portion of the IES work portfolio.

The work of IES is critical to understanding the effectiveness of the federal student aid programs. IES research ensures our nation's collective investment in the federal student aid programs pays off. Now, more than ever, we need evidence that clearly demonstrates the successes and weaknesses of the federal student aid programs so Congress, ED, and postsecondary institutions can adopt policies that deliver the best results. We make the recommendations below with the goal of ensuring the proposed redesign of IES delivers results that benefit every postsecondary education stakeholder, including but not limited to prospective, current, and former students; postsecondary institutions; researchers who study postsecondary education; and taxpayers.

First and foremost, IES cannot function without adequate staffing. The reduction in force in March 2025, which reduced IES staff by 90%, is likely to have caused a significant loss of institutional memory that will take years to rebuild. While we are grateful for the current effort, we do not believe any meaningful redesign can take place without restoring IES staffing levels to a reasonable level.

We are concerned with how these staffing cuts are already impacting the Integrated Postsecondary Education Data System (IPEDS). The first batch of IPEDS data since the reduction in force was released later than expected and with some early issues that, while eventually corrected, appear consistent with a lack of attention to detail compared to prior years. Recent cuts to IPEDS training programs raise concerns about institutions' ability to understand the data collection requirements and report their data correctly, raising serious data integrity concerns for future IPEDS data releases. And the recent addition of a swath of new admissions data reporting was undertaken in a rushed and haphazard manner, skipping the critical Technical Review Panel phase typically used for new data collections and not providing the Office of Management and Budget an opportunity to review the survey instrument during the approval process.

Staffing cuts and contract terminations also threaten long-standing data collections overseen by IES. For instance, contracts for the Beginning Postsecondary Students Longitudinal Study (BPS) and NPSAS, which have provided vital longitudinal data about who enrolls in college, how they pay for it, and how they fare in the long term, were cut earlier this year. While NPSAS has been reinstated, its future is still at risk.

It is critical that IES resume data collection for critical longitudinal studies, continue production of existing studies, and follow both the statute and long-standing internal processes to ensure that data collections are accurate and necessary.

It should go without saying that IES research and evaluations must be nonpartisan, objective, rigorous, and accurate. IES, like the Government Accountability Office and the Congressional Budget Office, are respected sources of information because of their mandate to operate free from political influence. That independence should be reflected not only in data interpretation, but also in the selection of projects IES takes on. IES research should be motivated by the pursuit of knowledge and not for political wins. Keeping IES objective increases the likelihood that ongoing projects will continue across presidential administrations, findings will be relevant regardless of shifting political winds, and that interpretation of data is free from bias.

IES should also ensure its projects are relevant. In a universe of limited resources, IES projects should focus on answering the most pressing concerns in the federal student aid programs. IES

research related to the federal student aid programs should prioritize investigating how those programs can best ensure access to, success in, and completion of a postsecondary credential of value without imposing unnecessary burden on any stakeholders. Relevance includes connecting research to practice. IES should partner with organizations and practitioners to ensure its research results are presented in a way that drives action based on evidence.

IES results should be easily accessible and published in a timely manner. While IES publications are nominally public, in practice they are accessible only to those who know what they're looking for and where to look. ED should proactively announce new research results in press releases, mass emails to relevant stakeholders, and social media, as a few examples. IES data should be made more widely available through Application Programming Interfaces (APIs) or other easily-accessible and publicly-downloadable ways. IES should also ensure continued access to the NCES data tools that researchers use to digest and analyze the data IES collects from all sources.

ED should also task IES with producing shorter briefs or summaries of their research results in addition to their full reports to ensure that findings are easily digestible by non-researchers. Understanding that IES projects can often span several years, IES should also publish timely updates and preliminary results to ensure continued engagement with IES projects among relevant stakeholders.

IES projects should be proactive, not just conducting evaluations required by Congress, such as for Experimental Sites Initiatives, but also for voluntary projects ED identifies as meaningful and necessary to the effective functioning of the federal student aid programs. Return of Title IV Funds is one area IES could explore, to weigh its effectiveness in preventing fraud and abuse in the federal student aid programs against the administrative burden it imposes. Satisfactory academic progress is another example of an area IES could explore, looking at how institutions use the flexibility afforded them in the law to ensure student success, a project that had begun but was canceled in early 2025¹. Finally, ED could explore how IES can be helpful to institutions in creating cost of attendance figures, such as with survey design and choosing data sources.

Finally, while IES should operate independently of political influence, ED should examine how IES can inform activities of other arms of the department, including Federal Student Aid (FSA). For instance, FSA should work with IES on new data collections to ensure there is no duplicative reporting and that data requests are appropriate to the goals FSA is trying to achieve.

¹<https://ies.ed.gov/use-work/evaluations/understanding-how-colleges-implement-satisfactory-academic-progress-requirements-and-their>

IES can play a critical role in informing postsecondary policy and practice so long as its research is objective, relevant, proactive, and accessible. However, any effective redesign of this critical research arm of the department must involve restoring IES staffing to a level that can produce results stakeholders can put into action to improve access to, success in, and completion of postsecondary education.

We appreciate the opportunity to comment on the Department's public comment period regarding its Request for Information; Feedback on Redesigning the Institute for Education Sciences. If you have any questions regarding these comments, please [contact us](#) or NASFAA's Director of Policy Analysis, Jill Desjean, at desjeanj@nasfaa.org.

Regards,

A handwritten signature in black ink that reads "Melanie E Storey". The signature is written in a cursive style with a large, sweeping initial "M".

Melanie Storey
President and CEO, NASFAA