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**VIA EMAIL**

December 3, 2003

The Honorable Rod Paige  
Department of Education  
400 Maryland Avenue, SW  
Washington, DC 20202

Attn: Margo K. Anderson

Dear Secretary Paige:

On behalf of the nation's 2.7 million educators, the National Education Association (NEA) is pleased to offer comments in response to the November 4<sup>th</sup> Federal Register notice regarding "Scientifically Based Evaluation Methods." (68 Fed. Reg. 62445, Nov. 4, 2003). We appreciate the opportunity to give input. At the outset, we want to emphatically state that we agree with the premise that all education programs funded by the federal government should require scientifically rigorous evaluations to demonstrate program effectiveness. Just as we demand more accountability from our nation's schools, students, and their educators, we must also demand accountability in the allocation of federal funds, specifically that programs actually improve the achievement of our nation's public school students.

The effort to implement a Department-wide research-based approach to evaluating programs has a significant impact on our members, as they are often the subjects of or implementers of many programs funded by the federal government. For this reason, we want to ensure three things: (1) that the evaluation approach used be appropriate for the problem or question the program itself seeks to address; (2) that the evaluation definition and set of priorities used are not so narrow that they effectively preclude the funding of worthwhile programs; and (3) that the Department continue to recognize the importance of third party, independent evaluators.

The NEA strongly endorses the National Research Council's study, *Scientific Research in Education*, and recognizes this to be the "gold standard" in terms of selecting methodology that is most appropriate for the question presented, rather than framing the question to fit the methodology. If a federal regulation were to reward or even tacitly endorse the latter approach, we would no longer have true evidence-based education initiatives. We also strongly agree with the comments of both the American Education Research Association and the National Education Knowledge Industry Association on this point.

Second, because you seek to evaluate *all* Department of Education programs, not just those funded under the Elementary and Secondary Education Act (as amended by the No Child Left Behind Act

(NCLB)), with a research-based approach, we believe that the controlling authority for such an effort is found in the recently-signed Education Sciences Reform Act of 2002 (P. L. 107-279). Section 102 of this law provides the following definition:

(19) SCIENTIFICALLY VALID EDUCATION EVALUATION- The term `scientifically valid education evaluation' means an evaluation that--

(A) adheres to the highest possible standards of quality with respect to research design and statistical analysis;

(B) provides an adequate description of the programs evaluated and, to the extent possible, examines the relationship between program implementation and program impacts;

(C) provides an analysis of the results achieved by the program with respect to its projected effects;

(D) employs experimental designs using random assignment, when feasible, and other research methodologies that allow for the strongest possible causal inferences when random assignment is not feasible; and

(E) may study program implementation through a combination of scientifically valid and reliable methods.

We believe this definition should not only be the one utilized by the Department, but that it is more appropriate and inclusive than the priorities proposed in the Federal Register notice. The priorities as written may have a dramatic and chilling effect on innovation in education, specifically on programs funded under Title V of NCLB. In “Recycling Reforms,” Diane Ravitch asserts – and we agree – that education does need more innovation, but “if evidence of effectiveness is a prerequisite for funding, are we truly supporting innovation or an already established program?”<sup>1</sup> She also provides advice to policy makers at the Department who will be making program funding decisions:

Check your ideology at the door. Be prepared to fund innovations that come from perspectives that differ from your own, as long as they can persuade you and peer reviewers that their plans might produce workable and effective programs.<sup>2</sup>

In addition to the impact on Title V, we also want to emphasize that the priorities in the Notice may be too narrow for other education programs, for which randomized control trials and matched comparison groups are not possible or feasible. We believe that the Notice should have included a commitment to acknowledge other rigorous, equally useful evaluation methods of an intervention’s effectiveness.

Finally, the Notice is silent about whether priority points will be awarded when evaluation designs utilize a third party, independent evaluator. We strongly believe that the Department should award such points. We echo the sentiments expressed by AERA and NEKIA in this regard.

We hope that NEA and other interested parties can meet with you or Mr. Whitehurst prior to the finalization of this Department policy. Thank you for the opportunity to provide comments on this important matter.

Sincerely,

Randy Moody  
Manager, Federal Policy and Politics

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<sup>1</sup> “Recycling Reforms,” Diane Ravitch, *Education Next*, Winter 2004.

<sup>2</sup> *Ibid.*