SCHOLARS
STRATEGY NETWORK

Regulation for Federal Financial Assistance

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To Director Vought:

I am writing to express my strong opposition to the proposed amendments to §§ 200.340, 200.205, 200.218, and 200.300 of Title 2 of the Code of Federal Regulations regarding federal research funding for educational research. As an Associate Professor at Texas A&M University specializing in teacher pipelines, preparation, and support, I have devoted my career to advancing evidence-based practices that at times include promoting inclusive and equitable learning environments. The proposed changes would inhibit research that is necessary to discover how best to meet the learning needs of all students.

American students come from a wide variety of backgrounds. Given that reality, two of my recent studies highlight the importance of equity-focused research:

- In the study "Beginning Teachers and Strategies for Asset-Based Pedagogy," I analyzed responses from approximately 2,000 novice teachers about how they account for students' cultural, ethnic/racial, and linguistic diversity. The findings show that beginning teachers overwhelmingly use instructional and lesson-based strategies to integrate asset-based pedagogy, which means adapting instruction to best meet the needs of the students in each classroom. This research also demonstrates that connecting with students' families and supporting social-emotional learning are crucial approaches, but these are less frequently used. Importantly, variation in asset-based pedagogy is driven not only by teacher demographics and grade level but also by the racial/ethnic, socioeconomic, and linguistic makeup of schools. This research demonstrates the need for targeted support and sustained research to inform practitioners, districts, and policymakers about methods for meeting the needs of diverse student populations.

- Another study, entitled "Equity Orientations of Novice Teachers," finds that teachers enact equity in three levels—inclusivity, exposure to social justice, and actively countering systemic inequities—and does this through methods of curricular adjustments, classroom discussions, and shifts in pedagogy. These results inform preparation and induction programs about how to empower teachers to meet the needs of diverse learners and to conceive and enact equity throughout classrooms.

The proposed regulatory changes threaten educational research broadly, but they particularly threaten teaching and learning. Learning about how best to teach and how students learn is crucial for fulfilling the universal right of education and should not be made political; rather, there needs to be a constant push towards continuous improvement so that all American children can be at the forefront of advancing economic progress. Below, I detail potential harms in educational research from each of the following policy changes:

- §200.340: Enabling cancellation of active research for reasons unrelated to scientific progress undermines long-term studies, destabilizing efforts to understand and improve how asset-based and

equity-focused teaching develops over time.

- §200.205: Requiring political appointee approval and downgrading peer review to advisory status threatens the objectivity and scientific rigor needed for advancing innovative, equity-oriented research.
- §200.218: Prohibiting entire categories of research, such as those using disparate-impact frameworks, would hinder essential investigations into educational, social, and health inequalities.
- §200.300: Restricting research involving diversity, equity, and inclusion directly damages ongoing efforts to enhance teacher responsiveness and student support.

These rules undermine the scientific foundation needed for meaningful teacher preparation and equitable classroom practices. Rigorous, peer-reviewed, equity-focused research is essential not only for developing practical strategies, but also for informing policy and empowering educators to meet the needs of all students.

I urge the agency to withdraw these proposed amendments. Protecting scientific independence and supporting rigorous educational research is vital for preparing teachers to serve diverse populations and for advancing achievement in America's schools.

Thank you for your consideration.

Sincerely,

Andrew Kwok, PhD