**Public Comments Received During the 30-day Comment Period**

**October 2017**

**Middle Grades Longitudinal Study of 2017-18 (MGLS:2017) Main Study Base Year (MS1), Operational Field Test First Follow-up (OFT2), and Tracking and Recruitment for Main Study First Follow-up (MS2)**

ED-2017-ICCD-0101 Comments on FR Doc # 2017-19229

**To:** U.S. Department of Education, National Center for Education Statistics

**From:** Alliance for Excellent Education, Jobs for the Future, and the Learning Policy Institute

**Date:** October 12, 2017

The undersigned organizations appreciate the opportunity to provide comments to the U.S. Department of Education’s (ED’s) notice regarding the necessity and utility of the Middle Grades Longitudinal Study (the Study). As described in the notice for public comment, the Study provides valuable information regarding “academic experiences and development of students during these critical years and will allow researchers to examine associations between contextual factors and student outcomes.” As organizations committed to using data to inform policy, we strongly urge ED to continue to conduct the Study and maintain the comprehensive set of factors and outcomes that are measured.

Transitions throughout a student’s K–12 education are important academically, socially, and for maintaining a college and career trajectory. Many students fall off a strong academic path at these critical moments, whether between elementary and middle school or middle and high school. Risks of the transition between middle and high school are particularly high, as unsuccessful high school transitions can contribute to disengagement, poor academic performance, and higher dropout rates.

Planning for students’ futures, including college and career aspirations, should begin during the critical middle school years. During this time, students should receive opportunities to develop knowledge about careers so that they can explore the wide range of options and consider possible education and career pathways. Collecting data through the Study on the middle school transitional periods is essential to improving the understanding of causes of unsuccessful transitions and providing more appropriate and effective supports to students to improve their success.

The Study also includes survey data on students’ attitudes and behavior, school and classroom environments, and information about social, emotional, and academic outcomes for the purpose of providing “a deeper understanding of the social and contextual factors related to students’ academic and non-academic outcomes.”1 Social and emotional learning (SEL) is a broad and multifaceted concept that the Collaborative for Academic, Social, and Emotional Learning defines as the process through which children and adults acquire and effectively apply the knowledge, attitudes, and skills necessary to understand and manage emotions, set and achieve positive goals, feel and show empathy for others, establish and maintain positive relationships, and make responsible decisions.2

Well-implemented programs designed to foster SEL are associated with positive outcomes, ranging from better test scores and higher high school graduation rates to improved social 2 behavior.3 Social and emotional competencies include (1) skills, such as the ability to collaborate or make responsible decisions; (2) academic mindsets, such as thinking positively about how to handle challenges; and (3) habits, such as coming to class prepared to learn. Data from well-designed measurement tools help policymakers and educators make strategic decisions about needed investments in student services, programs, and professional development.

Research shows that these types of investments in the middle years are extremely important. An econometric analysis conducted by Dr. James Heckman of the University of Chicago and Dr. Flavio Cunha of Rice University finds that while investments in early childhood are extremely important, they do not yield peak returns on their own. The analysis finds that disadvantaged young people who received balanced intervention *throughout* childhood, as opposed to early childhood intervention only, had increased high school graduation rates; increased college enrollment; and decreased conviction rates, probation, and welfare enrollment. Moreover, a series of studies published by the University of Chicago Consortium on Chicago School Research finds that the transition between eighth and ninth grade is a key turning point for students as course performance in ninth grade is shown to be predictive of high school graduation.4

Despite these findings, federal funding for middle and high schools is paltry compared to federal investments in early childhood, elementary schools, and postsecondary education. For Fiscal Year 2017, federal funding for birth–grade 5 was $27.6 billion and funding for postsecondary education was $32.7 billion; yet grades 6–8 received just $2.6 billion and grades 9–12 received only $3.1 billion.5 This “missing middle” in federal funding by grade spans is unlikely to yield the greatest returns. Results from the Study, the first of its kind for this age group, will provide a better understanding of the supports adolescent-aged students need for academic success, high school readiness, and positive life development.

The undersigned organizations appreciate ED’s consideration in maintaining the collection of a comprehensive set of data that can inform efforts to support students’ critical middle academic years. Please contact us if additional information would be useful.

Sincerely,

Alliance for Excellent Education

Association for Middle Level Education

Collaborative for Academic, Social, and Emotional Learning

Committee for Children

Jobs for the Future

Learning Policy Institute

National Association of Secondary School Principals

National Forum to Accelerate Middle-Grades Reform

**Notes**

1 National Center for Education Statistics, *Middle Grades Longitudinal Study of 2017-18 (MGLS:2017) Main Study Base Year (MS1), Operational Field Test First Follow-up (OFT2), and Tracking and Recruitment for Main Study First Follow-up (MS2), Supporting Statement Part A* (Washington, DC: U.S. Department of Education, Institute of Education Sciences, July 2017).

2 Center for Academic, Social, and Emotional Learning. “What Is SEL?,” http://www.casel.org/what-is-sel/ (accessed March 27, 2017).

3 D. Osher et al., “Advancing the Science and Practice of Social and Emotional Learning: Looking Back and Moving Forward,” *Review of Research in Education* 40, no. 1 (2016): 644–81; J. A. Durlak et al., “The Impact of Enhancing Students’ Social and Emotional Learning: A Meta-Analysis of School-Based Universal Interventions,” *Child Development* 82, no. 1 (2011): 405–32.

4 R. Niebling and P. Lovell, *Never Too Late: Why ESEA Must Fill the Missing Middle* (Washington, DC: Alliance for Excellent Education, 2015), https://all4ed.org/reports-factsheets/NeverTooLate/ (accessed October 5, 2017).

5 For more information, see Alliance for Excellent Education, *Missing Middle—Federal Funding by Grade Span, Fiscal Year (FY) 2017*, https://all4ed.org/reports-factsheets/missing-middle-federal-funding-by-grade-span-fiscal-year-fy-2017/ (accessed October 5, 2017).

**Response from NCES:**

Dear Representatives of Undersigned Organizations,

Thank you for your feedback posted on October 12, 2017 responding to a 30-day request for comments on the proposed Middle Grades Longitudinal Study of 2017-18. The National Center for Education Statistics (NCES) appreciates your interest in the MGLS:2017 survey. I have provided a response to comments below.

**Confirmation of the value of MGLS:2017**

We appreciate your validation of the direction taken by NCES in formulating the instruments for and conducting the data collection associated with this study, including your approval of the comprehensive set of factors and outcomes that are measured; of the particular value of measurement at the two transition points covered by the study (entry into the middle level grades and again into high school); of the socioemotional functioning scales and indicators found in both student and adult components of the MGLS survey and of their value as predictors of high school completion; and of the expected resulting data being of help to policymakers in better supporting effective interventions in the middle level grades.

**Encouraging added emphasis in certain areas**

We also thank you for encouraging the study to continue with and possibly increase our attention to several areas such as career-related variables and data points. We agree that these are important areas of interest and will consult with our Technical Review Panel (TRP) on this point next spring.

**The need for increased federal funding for middle and high schools**

You make the point that federal funding for grades 6-8 is only about a tenth of that for early childhood and elementary, while at the same time these are the years that set the stage for later success in career and college. The U.S. Congress is the source for these funds. We hope that the data that will result from the MGLS study will help inform these and other issues and opportunities related to middle and high school education.

Thank you again for your kind support and encouragement for this historic longitudinal data collection.

Sincerely,

Carolyn Fidelman

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https://surveys.nces.ed.gov/mgls

NCES Sample Surveys | Longitudinal Studies Branch

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