



October 27, 2025

Submitted via Regulations.gov

Linda McMahon
Secretary of Education
U.S Department of Education
400 Maryland Ave SW
Washington, DC 20202

RE: ED-2025-OS-0680; Proposed Priority and Definitions-Secretary's Supplemental Priority and Definitions on Meaningful Learning Opportunities

Dear Secretary McMahon:

On behalf of the more than 3 million members of the National Education Association (NEA), we submit the following response to the Department of Education's proposed priority and definitions on meaningful learning opportunities, as published in the Federal Register on September 25, 2025. As the nation's largest representative body of educators, NEA is committed to ensuring that every student, regardless of race, place, background, or ability, has access to a high-quality public education grounded in equity, relevance, and respect.

We support the Department's efforts to prioritize meaningful learning and recognize the opportunity this policy presents to redefine what success looks like for our students. However, to fully realize this vision, the Department must ensure that its policies not only reflect sound educational research but are also guided by principles of equity, developmental appropriateness, and educator empowerment. This letter outlines NEA's recommendations to refine and strengthen the proposed priority, with a focus on four core areas:

1. Advancing equitable access to high-quality, integrated instruction;
2. Aligning early learning strategies with the National Academies of Sciences, Engineering, and Medicine (NASEM) framework;
3. Supporting educator-led, innovative assessment models that reflect authentic learning; and
4. Ensuring systemic equity through full funding of critical federal commitments, including IDEA.

General Recommendations for Refining the Proposed Priority

i. Refine the Definition of “Meaningful Learning Opportunities”

The NEA recommends that the Department define meaningful learning as “instructional experiences that engage students in active, conceptually rich, and integrated exploration of ideas across disciplines, fostering understanding, reasoning, and real-world application.” This definition reflects what research and classroom practice show about how students learn best, through deep engagement, purposeful inquiry, and opportunities to make connections across subject areas. A clear, research-aligned definition will provide a strong foundation for future grant-making and policy implementation.

ii. Emphasize Developmental Appropriateness and Integration in Early Learning

In early childhood and primary grades, meaningful learning must reflect how young children naturally develop and make sense of the world. High-quality instruction at this stage should use inquiry, storytelling, and play to help students connect literacy, numeracy, and civic understanding in developmentally appropriate ways. Rather than relying on isolated drills, foundational skills should be built through integrated thematic learning that reflects children's interests and lived experiences. Educators must also be supported through sustained professional learning opportunities that are aligned with the latest developmental science and research, ensuring they are equipped to deliver instruction that meets students where they are.

iii. Engage and Empower Educators

Educators are essential to the success of any initiative to expand meaningful learning opportunities. The Department should invest in ongoing professional learning that links research to classroom practice and fosters continuous improvement. In addition, educators need protected time to collaborate with colleagues, analyze student learning, and engage families and communities in meaningful ways. Most importantly, the Department should ensure that educators are not passive recipients of policy but active leaders—designing, implementing, and evaluating strategies that reflect their expertise and meet the needs of their students.

iv. Ensure Equity and Inclusion in Access to Meaningful Learning

Though this administration has failed to see its value, equity must be at the heart of this priority. This includes acknowledging and addressing diverse learning needs, cultural and linguistic relevance, and systemic disparities in access to high-quality instruction and resources.

One critical and often overlooked barrier to equity is the chronic underfunding of the Individuals with Disabilities Education Act (IDEA). To truly ensure meaningful learning opportunities for all students, including those with disabilities, the Department must advocate for full funding of IDEA. Despite a federal promise to cover 40 percent of the excess costs of educating students with disabilities, the federal share remains below 12 percent, resulting in a \$39 billion shortfall in the 2023–24 school year alone.

This gap places a significant burden on states and school districts, often forcing them to divert resources from general education or cut essential programs. It undermines the ability of schools to provide inclusive, high-quality instruction for all learners. Full federal funding of IDEA is not just a fiscal issue, it is foundational to equity, access, and the realization of civil rights in education.

The Department must also ensure that definitions of “high-quality instructional materials” include evidence-based, standards-aligned, and culturally sustaining resources that reflect the lived experiences of students and communities.

Strengthening Core Instruction

The NEA appreciates the Department’s focus on strengthening core instruction as a cornerstone of meaningful learning. We support the inclusion of mathematics and other STEM disciplines and urge continued investment in evidence-based practices that build deep conceptual understanding and problem-solving skills.

Professional learning opportunities are essential to equip educators with the tools needed to implement these approaches effectively. The Department must ensure that competitive grants prioritize equitable access to advanced coursework, hands-on learning, and high-quality instruction, particularly for students from historically marginalized communities.

We also commend the recognition of computer science and artificial intelligence (AI) in the Department’s definitions. As AI tools become increasingly prevalent in classrooms, it is essential that educators are prepared to use them ethically, transparently, and effectively. The Department should support AI literacy initiatives and fund professional development that enables educators to both teach with and teach about AI.

Across all content areas, the Department must center educator voice in program design and implementation. Educators are experts in instruction and student learning and should be included as partners in every stage of policy and program development. This includes ensuring funding for the recruitment and training of math and STEM teachers, particularly in high-need areas. We are concerned by this administration’s cuts to federal grants aimed at supporting high-quality core instruction teacher preparation, including programs in Mississippi and Maryland that sought to address shortages and align preparation coursework with best practices.¹

Aligning with the NASEM Framework for Early Learning

To enhance the proposed definition of meaningful learning, we urge the Department to align more closely with the research and recommendations from the National Academies of Sciences,

¹ <https://www.edweek.org/policy-politics/math-and-career-education-are-now-top-grant-priorities-for-ed-dept/2025/09>

Engineering, and Medicine (NASEM).² Their framework for meaningful early childhood learning emphasizes the importance of active engagement, conceptual understanding, and integrated instruction across key domains.

According to NASEM,³ instruction is most meaningful when it:

1. Builds deep conceptual understanding rather than surface-level memorization.
2. Engages children in active, socially mediated learning experiences that connect new ideas to prior knowledge.
3. Integrates content across subject areas—especially language, mathematics, and social foundations—to reflect how young children naturally learn.
4. Fosters curiosity, reasoning, and problem solving rather than compliance or rote performance.
5. Occurs in culturally and linguistically responsive contexts that affirm children’s identities and experiences.

We are particularly concerned that the proposed emphasis on “rigor” and “achievement” in early childhood lacks critical nuance. For students aged 3–8, developmentally appropriate, play-based, and integrated approaches to ELA, math, and social studies are not only best practice, they are essential to long-term academic success.

Advancing Innovative Assessment Models

The NEA believes every student deserves access to an excellent education grounded in high standards, one that empowers them to achieve their dreams. To that end, we support high-quality assessment practices that produce accurate, meaningful evidence of student learning to inform instruction and promote success. Students thrive in learning environments that are caring, inclusive, and intellectually challenging, and our assessment systems must reflect these values. These systems should be designed by educators, in collaboration with stakeholders, to capture the full scope of students’ knowledge, skills, and dispositions.⁴

Accordingly, the federal government should support the development and use of varied assessments as part of the Secretary’s priority on meaningful learning. NEA opposes the use of federal funds to expand high-stakes standardized testing or increase its weight in accountability systems. Instead, we advocate for ongoing, comprehensive assessments that measure learning, growth, and essential competencies, such as critical thinking, collaboration, and communication, particularly through authentic and performance-based approaches, including extended curricular activities, portfolios, and projects.

One of the most constructive steps the Secretary can take is to clarify the appropriate role of statewide summative assessments. These assessments may provide a snapshot of student progress

² <https://nap.nationalacademies.org/read/19401/chapter/1>; <https://nap.nationalacademies.org/catalog/24783/how-people-learn-ii-learners-contexts-and-cultures>

³ <https://nap.nationalacademies.org/read/19401/chapter/1>; <https://nap.nationalacademies.org/catalog/24783/how-people-learn-ii-learners-contexts-and-cultures>

⁴ <https://www.nea.org/resource-library/principles-future-assessment>

and learning outcomes, but they should not be expected to both drive and capture learning simultaneously. They are a limited tool and should be treated as such.

The Secretary should also allow state and local educational agencies participating in the Innovative Assessment Demonstration Authority (IADA) to meet comparability requirements through more flexible definitions, such as alignment with academic standards or consistency in tasks and scoring, rather than requiring results identical to those of existing statewide tests. Leading experts in educational measurement have supported such alternatives, which would better enable the development of culturally relevant, inclusive assessments that reflect what students truly know and can do.⁵

i. **Supporting the development, implementation, and scaling of new or innovative assessment models that accurately and fairly measure all students' learning and progress, including competency- and mastery-based assessments.**

The Department should support the development, implementation, and scaling of innovative assessment models that accurately and fairly measure student learning and progress, including competency- and mastery-based approaches. Competency-based assessment, as defined by the National Center for Education Statistics, evaluates whether students possess the knowledge, skills, and abilities needed to meet specific learning goals.⁶ Unlike traditional models that assess all students on the same schedule, competency-based systems allow for personalized, flexible demonstrations of learning.

While NEA does not currently have an official position on competency-based education or assessment, we stress that successful implementation requires sustained investment in professional learning, high-quality instructional materials, and systemic support. Educators must be equipped to conduct formative assessments, differentiate instruction, and provide substantive feedback—work that requires time, autonomy, and resources. These systems must enhance, not replace, educator judgment. NEA firmly opposes any effort to undermine professional autonomy, including overreliance on AI or outsourcing of instructional responsibilities.

It is not enough for states or districts to alter when students are assessed; we must also change how assessments are conducted. NEA calls for greater use of low-stakes, curriculum-embedded, and performance-based approaches that support deeper learning.

As shown in the 2020 study by Dr. Michelle Fine and Dr. Karyna Pryiomka on the New York Performance Standards Consortium and the City University of New York, performance-based assessments can significantly improve student outcomes and narrow achievement gaps.⁷ This

⁵ <https://learningpolicyinstitute.org/product/developing-assessment-systems-federal-support-brief>

⁶ U.S. Department of Education, National Center for Education Statistics. Defining and Assessing Learning: Exploring Competency-Based Initiatives, NCEES 2002-159, prepared by Elizabeth A. Jones and Richard A. Voorhees, with Karen Paulson, for the Council of the National Postsecondary Education Cooperative Working Group on Competency-Based Initiatives. Washington, DC: 2002.

⁷ Fine, M., & Pryiomka, K. (2020). Assessing college readiness through authentic student work: How the City University of New York and the New York Performance Standards Consortium are collaborating toward equity. Palo Alto, CA: Learning Policy Institute.

evidence underscores the value of allowing students to demonstrate learning in diverse, meaningful ways. Additional research is needed to examine the benefits of these strategies. NEA supports discretionary grant priorities that advance equitable, student-centered assessment practices across diverse settings.

ii. **Supporting the development, implementation, and scaling of assessment models that provide timely and useful information to educators, students, and families to address student learning needs.**

Assessment models must provide timely and useful information to educators, students, and families to inform teaching and support learning. However, NEA is concerned that the use of the word “scaling” may signal an overemphasis on large-scale, commercialized testing systems, rather than empowering educators to engage in formative assessment themselves.

Over-commercialization risks shifting control away from the classroom. Educators should not be passive recipients of data; they must be equipped and supported to design, deliver, and interpret assessments as an integral part of the instructional process. Research consistently confirms that educator-led formative assessment is one of the most powerful tools to improve student achievement.⁸

Formative assessment provides ongoing insights throughout instruction, allowing educators to adjust their strategies to meet students’ needs. NEA members have the expertise to carry out this work, and they must be supported accordingly. Federal funding should help states and districts engage educators directly in the design, implementation, and interpretation of assessments, not rely solely on external vendors or tools.

iii. **Encouraging the use of adaptive technologies for assessments.**

NEA supports the responsible use of technology in assessment systems, including the development and integration of adaptive assessments that are tailored to students' current knowledge levels. However, innovation must not come at the expense of student privacy, civil rights, or transparency.

We also encourage the Department to provide targeted flexibility for states to reduce the number and frequency of statewide summative assessments in order to create space for more innovative models. Any such flexibility must preserve requirements for disaggregating and publicly reporting achievement data, ensuring that schools remain accountable for the progress of all student groups.

Conclusion

The NEA believes that the proposed priority presents an important opportunity to reshape how we think about and implement educational policies at the federal level. However, it is critical that this opportunity be fully leveraged to create an education system that is equitable, inclusive, and centered on student-centered learning. By explicitly incorporating the NASEM framework, focusing on

⁸ Evans, C., & Marion, S. (2024). *Understanding instructionally useful assessment*. Taylor & Francis.

developmentally appropriate practices, and ensuring educator empowerment, the Department can create a future where all students are not only ready for academic success but also prepared for meaningful participation in our democratic society.

We urge the Department to consider these recommendations in the development of its final priority and definitions. The NEA stands ready to collaborate with the education community to ensure that the vision of meaningful learning opportunities is realized for every student. Our members, the educators on the frontlines, are dedicated to this mission, and with the right support, resources, and policies, we can transform the educational experience for all students.

The NEA respectfully submits these recommendations for consideration. Please do not hesitate to contact me or Bianca Singh at BSingh@nea.org, should you have any questions or need further clarification.

Sincerely,

A handwritten signature in black ink that reads "Daaiyah Bilal-Threats". The signature is written in a cursive style with a long horizontal line extending to the right.

Daaiyah Bilal-Threats
Senior Director, Education Policy and Implementation Center
National Education Association