



April 2, 2026

Submitted via Regulations.gov

Kirsten Baesler
Assistant Secretary for Elementary and Secondary Education
U.S Department of Education
400 Maryland Ave SW
Washington, DC 20202

RE: ED-2026-OESE-0364; Proposed Priorities, Requirements, and Definitions-Comprehensive Centers Program

Dear Ms. Baesler:

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 priorities and requirements for the Comprehensive Centers Program published in the Federal Register on March 3, 2026. As written, the proposal fails to resolve longstanding fragmentation, duplication, and lack of transparency in federal technical assistance. It also does not adequately ensure that educators, particularly classroom teachers, have a meaningful role in shaping the supports intended to serve them.

Structural Concerns: Duplication, Coordination, and Transparency

Federal technical assistance efforts are too often duplicative, difficult to navigate, and insufficiently coordinated. The current proposal does not meaningfully address these systemic weaknesses. NEA strongly urges the Department to establish a single, clearly authorized coordinating entity (e.g., a National Center) with responsibility for aligning work across Comprehensive Centers, Regional Educational Laboratories (RELs), and other federally funded initiatives. Without effective coordination, duplication will continue and resources will be wasted.

At the same time, the proposal’s reliance on “state-identified needs” lacks rigor and transparency. There is no consistent framework for how these needs will be identified, whose perspectives will be included, or how competing priorities will be reconciled. NEA recommends requiring formal, public-facing needs assessments supported by common indicators of need, developed in partnership with educators, school leaders, families, and communities. These assessments must be more than

procedural, they must directly shape funding, priorities, and service delivery to reflect expressed needs and goals.

The absence of strong educator voice requirements is a critical flaw. Educators are central to the success of any technical assistance effort, yet the proposal does not require their meaningful participation. NEA calls for explicit requirements that ensure educators hold a defined and substantial role in decision-making structures, including minimum representation thresholds on advisory bodies and in needs assessments processes. Without this, the program risks producing guidance that is disconnected from classroom realities.

The program also raises concerns about program stability and continuity. Past federal decisions to eliminate or consolidate technical assistance programs, based on unsupported assumptions that other entities would absorb their responsibilities, have resulted in the loss of essential supports. The recent disruption to the Comprehensive Centers Program underscores the need for safeguards that prevent abrupt program changes that destabilize states, districts, and educators.

Response to Question 2: Ensuring Services Meet State Needs

Ensuring that services meet the needs of states requires more than alignment to state priorities; it requires sustained, structural engagement, transparency in decision-making, and mechanisms that translate need into actionable support. States vary widely in capacity and context, and technical assistance must be both responsive and practically useful to those responsible for implementation.

NEA recommends the following:

- Require Regional Centers to create binding annual plans co-developed and negotiated by Centers and the states and beneficiaries they serve, with clear expectations for implementation and accountability. These plans should be revisited regularly to reflect emerging needs and shifting policy demands.
- Direct Centers to provide hands on, educator-informed support for implementing new federal policies, programs, and requirements, ensuring that guidance is actionable and grounded in practice rather than purely advisory.
- Require development and dissemination of case studies demonstrating effective state and district implementation, enabling cross-state learning and reducing duplication of effort.
- Establish structured professional learning communities to support collaboration and shared problem-solving across states facing similar challenges.
- Support cross-state site visits and implementation exchanges to ground technical assistance in real-world practice and strengthen peer learning.
- Require formal participation of educator organizations, including unions, in planning, implementation, and evaluation to ensure that strategies reflect on-the-ground realities and workforce considerations.

Specific Concerns with Program Requirements

Undefined Use of “Evidence” (Program Requirement 1)

The requirement that the National Center provide “evidence” that services reflect state-identified needs is not defined, creating ambiguity and a high likelihood of inconsistent interpretation. Without clear parameters, this requirement risks becoming a compliance exercise rather than a meaningful standard.

NEA recommends establishing a clear, enforceable definition of “evidence,” including what qualifies, how it must be documented, and how it will be used to assess alignment between services and identified needs.

Lack of Clarity on National Evaluation (Program Requirement 4)

The requirement to participate in a national evaluation does not specify its purpose, design, or consequences. This lack of transparency raises concerns, particularly given recent instability in the program. Absent clear guardrails, evaluation processes can create uncertainty for Centers and states may not yield actionable or relevant findings.

NEA recommends clarifying the purpose, design, stakeholder role, and use of evaluation findings, including any implications for funding or program continuation. The Department should also include safeguards to ensure that evaluation results are used to improve program effectiveness rather than justify abrupt or destabilizing program changes.

Conclusion

As proposed, the Comprehensive Centers framework does not resolve duplication, does not establish meaningful coordination, and does not ensure that educator expertise drives decision-making. Without substantial revision, the program risks continuing the same inefficiencies and disconnects that have limited the effectiveness of federal technical assistance.

We respectfully submit these comments for consideration and urge the Department to adopt the recommendations outlined above to ensure the program is coherent, accountable, and grounded in the expertise of educators. Please do not hesitate to contact me or Bianca Singh at BSingh@nea.org, should you have any questions.

Sincerely,



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