

Comment on the Australian Productivity Commission Draft Report 'National Education Evidence Base' of September 2016

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In addition to these comments, I also attach a recent chapter on 'Evidence-Based' research, written for publication in a forthcoming Handbook on research on teaching. That chapter will provide more historical grounding and technical concerns that I raise in these comment, but was written for a professional audience. These comments are intentionally written for public consumption.

Having conducted government sponsored evaluation research projects and reviews of government departments, as well as in formally collaborative research projects between universities and government departments - in several states and federally - I have first-hand knowledge of nearly all of these issues raised in the report. My expertise on these matters extends well beyond the frontiers of Australian research, having conducted such research in federal research centers of the United States, consulted on the establishments of a policy direct education research centre in Singapore, advised and trained colleagues for such work in South Africa, as well as being a current editor for one of the top ranking educational research journals on the planet, the *American Educational Research Journal*.

Here I will focus most of my comments on those portions of the report of direct interest to education research in Australia generally, and not comment - except offer general support - on the bulk of the document. That is, most of the report addresses factors related to the quality, access and in many cases simple existence of data internal to government department and owned entities involved in the delivery of early childhood and school education. As most of the issues raised in those sections or the report are matters truly internal to the functioning of those departments, I can merely offer support to the intention of those chapters and related recommendations and leave how to reach those desired goals to those with more expertise than I within government bureaucracies.

However, several chapters of the report extend beyond the boundaries of government and address an identified lack of a strong research for 'evidence-based policy,' with broad claims about what types of education research are needed for a strong evidence base on which to base policy, how priorities for that research might be developed, the needed capacity to generate that research (both in terms of expertise and funding), and what institutional arrangements might deliver the needed work. It is on these matters that I will comment directly, as the implications of this report and its recommendation carry significant potential impacts on university based research, and the public interest, which are far more concerning that I believe the authors and original submissions realise.

To organize my comments, below I address five points raised in the review as follows: 1) the extent to which there is a need for better research to inform policy, 2) the nature of the needed research, 3) the capacity needed to produce that research, 4) who the audience of that research should be, and 5) the governance structure needed to produce research that is in the public interest.

The need for better research to inform policy

As the report notes, there are several aspects of ongoing educational debate which could well be better advanced if a stronger evidence base existed. Examples of ongoing public educational debates are easily identified in Australia, most notably being the perpetual literacy wars. In a

rational world, so the report seems to suggest, such debate could well become a thing of the past if only we had strong enough research to settle them. To me, this is a laudable goal.

However, such a standard position is naive in its assessment of why these debates are in fact on-going, and more naive in proposing recommendations that barely address any but the most simplistic reasons for the current situation. That is, whatever the current state of literacy research, the report itself demonstrates that the major source of these debates is not actually the research government directed policy agents decide to use and interpret, but the simple fact that there is NO systemic development of research informed policy analysis which is independent from government itself in Australia. The introductory justification for this report, based loosely on a weak analysis of a small slice of available international comparative data, demonstrates clearly how government directed research works in Australia. As an editor I can confidently say that analysis would not meet the standards of our highest ranked research journals because it is apparently partial, far from comprehensive and lacking in its own internal logic. It is a very good example of the very sort of research use away from which the report claims to want to move.

The nature of the needed research

The report makes much of the need for research which tests causal claims, placing high priority on experimental and quasi-experimental design. This portion of the report simply recapitulates arguments about the need for more causal hypothesis testing research in education promoted under the banner of a 'gold-standard' of research advanced more than a decade ago in the USA and UK. This argument is in part common-sense. However, it is also naïve to make presumptions that such research will by design provide what policy makers need in the development of policy. Although comparisons are here, as has commonly been done in the USA and UK, made between the research in education relative to that in medicine – for a variety of sensible reasons – the implications of that comparison are vastly unrecognized in the report.

If Australia wishes to develop a more secure national evidence base for educational policy akin to that found in medicine, it must confront basic realities which most often are ignored and which are inadequately understood in this report: a) the funding level of educational research is a minuscule fraction of that available to medicine, b) the range and types of research that inform medical policy extend far beyond what is identified here as 'gold standard' to include epidemiological studies, program evaluations and in fact qualitative studies relevant to most medical practices, and c) the degree to which educational practices are transportable across national and cultural differences is far less than that confronted by doctors whose basic unit of analysis is the human body. Just at a technical level, while the need for randomised trials is identified in the report, there are clearly naïve assumptions about how that can actually be done with statistical validity that accounts for school level error estimations and the subsequent need for large samples of schools. (Individual level randomisation is insufficient.) Thus, the investment needed for truly solid evidence-based policy research in education is dramatically under-estimated in the report and most public discussions.

The capacity needed to produce that research

The report does well to identify a substantial shortage of Australia expertise available for this sort of research, and in the process demonstrates two dynamics which deserve much more public discussion and debate. First, there has been a trend to relying on disciplines outside of education for the technical expertise of analyzing currently available data. While this can be quite helpful at times, it is often fraught with the problems of invalid interpretations, simplistic (and practically unhelpful) policy recommendations which fail to take the history of the field and systems into account, and over-promising future effects of following the policy advice given. Second, the report dramatically fails to acknowledge that the current shortage of research capacity is directly related to the manner and form of higher education funding available to do the work needed to develop future researchers. There is the additional obvious issue of a lack of secure career development in Australia for educational researchers. This, of course, is directly related to the previous point.

Audience of evidence-based policy research

While the report is clearly directed to developing solid evidence for policy-makers, it understates the need for that research to also provide sufficient reporting to a broader public for the policy making process. By necessity this involves the development of a much larger dissemination infrastructure that currently exists. At the moment it would be very difficult for any journalist, much less any member of the general public, to find sound independent reports of larger bodies of (necessarily complicated and sometime conflicting) research written for the purposes of informing the public. Almost all of the most independent research is either not translated from its scholarly home journals or not readily available due to restrictions in government contracts. What is available publicly and sometimes claims to be independent is almost always conducted with clear and obviously partial political and/or self- interest. The reason this situation exists is very simply that there is no independent body of educational research apart from that conducted by individual researchers in the research projects conducted with the independent funding of the ARC (and that is barely sufficient to its current disciplinary task).

Governance structure needed to produce research that is in the public interest

Finally I think perhaps the most important point to make about this report is that it claims to want to develop a national evidence base for informing policy, but the proposed governance of that evidence and research is entirely under the same current government strictures that currently limit what is done and said in the name of educational policy research in Australia. That is, however much there is a need to increase the research capacities of the various government departments and agencies which currently advise government, all of those are beholden to currently restrictive contracts, or conducted by individuals who are obligated to not publicly open current policy to public criticism. By definition this means that public debate cannot be informed by independent research under the proposed governance for the development of the proposed national evidence base.

This is a growing trend in education that warrants substantial public debate. With the development of a single curriculum bodies, a single institute for professional standards, all with similarly restricted governance structures (just as was recently proposed in the NSW review of its Board of Studies), the degree to which alternative educational ideas, programs and institutions can be openly developed and tested is becoming more and more restricted. Given the reports desire to develop experimental testing, it is crucial to keep in mind that such research is predicated on the development of sound alternative educational practices which require the support of substantial and truly independent research.