

Docket: ED-2025-SCC-0976 State and Local Educational Agency Record and Reporting Requirements under Part B of the Individuals with Disabilities Education Act

OSERS received 13 comments from The Autism Alliance, the North Central Independent Living Services, Inc., and several individuals during the 60-day comment period. The commenters made two recommendations: to report the disparate impact and effect of behavior and education policies, and report on the use of aversive therapies. OSERS appreciates the recommendations from The Autism Alliance and the North Central Independent Living Services, Inc., regarding SEA and LEA data reporting to the Department.

This collection focuses on IDEA requirements that SEAs and LEAs must implement and maintain but not submit to the Department. Therefore, there are no revisions that could be made to this collection based on the comments received.


OSERS will respond to comments received during the 30-day comment period.

#	Date	Commenter	Affiliation	Comment ID Number	Tracking #	Comment	Analysis/Response
1	12/10/25	Richard Papp		ED-2025-SCC-0976-0006	miy-q24e-nzkd	As a taxpayer sick of funding failure, I demand the Department enforce accountability under IDEA, cut wasteful spending on ideology, and refocus on literacy and core education. No more excuses – deliver results or face cuts!	OSERS appreciates the submitter’s comments. This collection focuses on IDEA requirements that SEAs and LEAs must implement and maintain but not submit to the Department. Therefore, there are no revisions that could be made to this collection based on the comments received.
2	12/10/25	Richard Papp		ED-2025-SCC-0976-0007	miy-q7wg-dakl	All teachers should be required to wear body cameras while interacting with pupils.	OSERS appreciates the submitter’s comments. This collection focuses on IDEA requirements that SEAs and LEAs must implement and maintain but not submit to the Department. Therefore, there are no revisions that could be made to this collection based on the comments received.
3	2/3/26	Gayle Bartlett	SEA	ED-2025-SCC-0976-0014	ml5-qyj9-edz2	There needs to be better supervision that iep’s are followed. I had horrible issues getting anything added to a IEP for 3 years. My child is now behind 3 years by test scores. I complained dozens of times at county level with NO RESULTS but harassment and retribution because I requested better support for my child and adults were publicly shaming him and bullying him at the school...there should be a complaint format county level and easier to complain at state level. It's hard enough raising a disabled child without the school making it harder. Make a form so there's a solid paper trail so schools are made	OSERS appreciates the submitter’s comments. This collection focuses on IDEA requirements that SEAs and LEAs must implement and maintain but not submit to the Department. Therefore, there are no revisions that could be made to this collection based on the comments received.

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						accountable. I've a child needing surgery because he was neglected...and possibly years of psychiatry and ABA to get him to trust adults other than me again. A form that's a solid complaint that can't be lost...60 days to fix it, and solid penalties to the family if they fail to fix complaints. My child's test scores prove I had reason to complain. They didn't meet his needs, they failed fape. And the retribution has continued with him in another school still from that old principle. The superintendent never even called my numerous calls back, addressed the issues or even cares, he's never in the office. He needs a HUGE PAY CUT so more money goes to the kids. The district claimed broke but were the 3rd highest taxed area in Oakland county...so does he have a slush fund? Audit Huron valley schools before he robs us blind and bankrupt the district.	
4	12/10/25	Cynthia Cataldo	Child Advocate	ED-2025-SCC-0976-0010	miy-r3vd-luyj	As a taxpayer sick of funding failure, I demand the Department enforce accountability under IDEA, cut wasteful spending on ideology, and refocus on literacy and core education. No more excuses – deliver results or face cuts!	OSERS appreciates the submitter's comments. This collection focuses on IDEA requirements that SEAs and LEAs must implement and maintain but not submit to the Department. Therefore, there are no revisions that could be made to this collection based on the comments received.
5	2/3/26	North Central Independent Living Sevices, Inc.	Community Organization	ED-2025-SCC-0976-0013	ml5-8sxo-4jb1	My name is Shyla Patera. I am the Policy Coordinator representing North Central Independent Living Services , Inc. in Black Eagle, Montana. NCILS is a center for independent living serving north central Montanans with disabilities. The mission of a center for living is to help Americans with disabilities navigate services in order to help them live in communities of choice with or without services and supports. I wish to comment on the Department of Education 's Agency Information Collection Activities; Comment Request;State andLocalEducational Agency Records and Reporting Requirements Under Part B of IDEA. NCILS believes that the Department of Education should protect the disability and civil rights of all students with disabilities, particularly those who are in public schools, but also those students who are in private or religious education. NCILS would recommend that the	OSERS appreciates the submitter's comments. This collection focuses on IDEA requirements that SEAs and LEAs must implement and maintain but not submit to the Department. Therefore, there are no revisions that could be made to this collection based on the comments received.

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						school life and careers. Schools, districts, LEAs, and SEAs must evaluate how students learn as both educational knowledge and the transmission of said knowledge changes. student students also need to be learning and utilizing assistive technology in classrooms and community settings of all educational institutions. The Department of Education as well as SEA and LEA'S must be recording and reporting the disparate impacts and effects of behavior and educational policies . If States and Local educational agencies are pursuing policies that seclude ,restrain ,and punish students , Districts and educator's may be teaching students that the right to self autonomy and their civil rights are less important than a linear behavior paradigm. SEAs and LEAs should report and record use of aversive therapies and how we are phasing out said therapies and using non-averse techniques for complex learners with multiple disabilities.	
6	12/3/26	Miradije Devolli	Clinton Twp, MI	ED-2025-SCC-0976-0012	ml5-56qp-8bk2	We need more funding for paraprofessionals in general education giving kids with IEPs their rights to an education under the IDEA law to be educated in the least restrictive environment. School districts are failing these kids who need to be in gen ed with aide (inclusion) to be able to thrive and succeed. This happened to my son. He's a high school student who has been out of school for two years because the school won't place him in gen ed with aide. They placed him in mici program where it caused him school trauma, burnout, anxiety and stress. I pulled him out two years ago and he hasn't been in school. He's 17. No future. He won't drive and graduate. The wrong school environment caused damage to his social and emotional development. Special education system is broken and it needs to be changed.	OSERS appreciates the submitter's comments. This collection focuses on IDEA requirements that SEAs and LEAs must implement and maintain but not submit to the Department. Therefore, there are no revisions that could be made to this collection based on the comments received.
7	12/10/25	Marilyn Muller	Individual	ED-2025-SCC-0976-0004	miy-paym-vbds	As a taxpayer sick of funding failure, I demand the Department enforce accountability under IDEA, cut wasteful spending on ideology, and refocus on literacy and core education. No more excuses – deliver results or face cuts!	OSERS appreciates the submitter's comments. This collection focuses on IDEA requirements that SEAs and LEAs must implement and maintain but not submit to the Department. Therefore, there are no revisions that could be made to this collection based on

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8	2/3/26	April Cullum	Grand Rapids, MI	ED-2025-SCC-0976-0015	ml5-xb1b-y6z9	<p>I echo the comments made by the Autism Alliance of Michigan put forth in the attached document.</p> <p>Thank you, April Cullum</p>  <p>2026_0202 Autism Alliance Public Comm</p>	<p>OSERS appreciates the support and recommendations regarding SEA and LEA data reporting to the Department.</p> <p>This collection focuses on IDEA requirements that SEAs and LEAs must implement and maintain but not submit to the Department. Therefore, there are no revisions that could be made to this collection based on the comments received.</p>
9	12/10/25	Anonymous Anonymous	Child Advocate	ED-2025-SCC-0976-0008	miy-qof8-9kie	<p>As a taxpayer sick of funding failure, I demand the Department enforce accountability under IDEA, cut wasteful spending on ideology, and refocus on literacy and core education. No more excuses – deliver results or face cuts!</p>	<p>OSERS appreciates the submitter’s comments.</p> <p>This collection focuses on IDEA requirements that SEAs and LEAs must implement and maintain but not submit to the Department. Therefore, there are no revisions that could be made to this collection based on the comments received.</p>
10	12/10/25	Sven Scharpen	Child Advocate	ED-2025-SCC-0976-0009	miy-qr6v-x4ml	<p>My name is Sven Scharpen, a former special education student turned advocate for children on the autism spectrum. As someone who was forced to go through the process of special education, I’ve seen only abuse, isolation, and fraud with no success. In my personal experience, I was given preschool level assignments in fifth grade despite being smarter than my general education classmates. I was also forced to move schools because school officials believed I would fail without affective needs programs, even though I was not failing. This all happened without my parents’ consent. When my parents were present, they were lied to and manipulated. When I was moved schools, four years of social progress was undone, and I was put in a deep depression and even contemplated suicide due to me believing that my life and what I knew didn’t matter to anyone. If it weren’t for my faith, I don’t know if I would be here right now. Today I’m noticing that the people that went through similar hardships that I did have now all decided they’re trans, and their health & beauty are being eroded away. This is</p>	<p>OSERS appreciates the submitter’s comments.</p> <p>This collection focuses on IDEA requirements that SEAs and LEAs must implement and maintain but not submit to the Department. Therefore, there are no revisions that could be made to this collection based on the comments received.</p>

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						<p>happening because adults in both general and special education, as well as on social media told these lonely, struggling autistic kids that they struggle because they were actually “born in the wrong body”. What I’m witnessing is a holocaust happening to me and my peers because the school and medical systems care more about their own money and power over America’s brightest and most talented youth. Seventeen states are failing to properly comply with the Individuals with Disabilities Education Act(IDEA), and there is no law I’m aware of preventing the kind of abuse I described. Some passed laws actually push, encouraging, and/or celebrate some of what I described is happening to children. As a concerned American citizen, I’m so sick of taxpayer money being funded to these programs and promoting false studies saying they’re effective. I know from experience that they’re harmful. It’s no coincidence that the most successful autistic people were not put in special education. What we need is better understanding, better care, and proper accommodations only if we need them. We should also conduct investigation into special education programs to see if constitutional & human rights are being violated. Diagnosis is meant to help someone understand what’s wrong or different with them, not to be used as a tool for authoritarian control.</p>	
1 1	1/12/26	Anonymous Anonymous	Federal Agency	ED-2025-SCC-0976-0011	mk8-mra2-0qtd	<p>I strongly support the U.S. Department of Education’s proposal to extend, without change, the currently approved Information Collection Request (ICR) associated with Part B of the Individuals with Disabilities Education Act (IDEA), OMB Control Number 1820–0600.</p> <p>The data collection requirements covered by this ICR are essential to the proper functioning of IDEA, to effective state and local implementation, and—most critically—to ensuring equitable educational access and improved outcomes for children with disabilities, one of our nation’s most vulnerable student populations.</p> <p>Necessity of the Collection to the Proper Functions of the</p>	<p>OSERS appreciates the support and recommendations regarding SEA and LEA data reporting to the Department.</p> <p>This collection focuses on IDEA requirements that SEAs and LEAs must implement and maintain but not submit to the Department. Therefore, there are no revisions that could be made to this collection based on the comments received.</p>

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						<p>Department</p> <p>The information collected under this ICR is foundational to IDEA's statutory and regulatory framework. These requirements are not ancillary or duplicative; they are core to ensuring that states and local educational agencies (LEAs):</p> <ul style="list-style-type: none"> Meet their legal obligations to students with disabilities Provide transparency to families and the public Allocate resources equitably and strategically Maintain procedural safeguards and due process protections <p>Without these data, the Department—and states themselves—would lack the basic infrastructure needed to ensure compliance with IDEA's civil rights protections. In many cases, the data are the only mechanism by which families, advocates, and policymakers can verify that protections guaranteed under federal law are being implemented in practice.</p> <p>Timely Use and Practical Application of the Data</p> <p>The information collected under this ICR is actively and continuously used, even when it is not reported directly to the Secretary of Education. At the state and local levels, these data are routinely used to:</p> <ul style="list-style-type: none"> Identify service gaps for students with disabilities Monitor access and equity for parentally placed private school students Inform decisions related to high-cost funds and fiscal sustainability Improve dispute resolution processes, including mediation and complaints Strengthen early intervening services to prevent inappropriate identification or delayed support <p>Far from being static or unused, these data drive real-time operational decisions and long-term policy improvements that directly affect students' educational experiences.</p> <p>Accuracy and Reasonableness of the Burden Estimate</p> <p>The estimated burden hours reflect the real and necessary work</p>	

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						<p>involved in responsibly administering a federal civil rights law. Importantly, much of the data collection reflects activities that states and LEAs would—and must—perform regardless of federal reporting requirements in order to operate compliant special education systems.</p> <p>Characterizing this work as “burden” risks overlooking its essential purpose: protecting students’ rights and ensuring appropriate educational services. Any significant reduction in these data collection requirements would likely shift costs and risks to students and families, rather than meaningfully reducing administrative effort.</p> <p>Quality, Utility, and Clarity of the Information Collected The current structure of the ICR strikes an appropriate balance between rigor and feasibility. The information collected is: Clearly defined in statute and regulation Directly aligned with IDEA implementation requirements Actionable for states, LEAs, and the public</p> <p>Maintaining consistency—rather than revising or fragmenting these requirements—preserves data comparability over time, which is essential for identifying trends, evaluating policy effectiveness, and supporting continuous improvement.</p> <p>Minimizing Burden While Preserving Essential Protections The Department’s existing approach appropriately emphasizes use of information technology and state-level flexibility in how data are collected and maintained. Importantly, minimizing burden should not come at the expense of: Transparency for families Oversight of public funds Procedural safeguards Accountability for serving students with disabilities</p> <p>In the context of IDEA, data collection is not merely an administrative exercise—it is a mechanism of equity and</p>	

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						<p>accountability. Any reduction in these requirements would risk weakening protections for students who already face significant educational barriers.</p> <p>Summary Continuing this ICR without change is not only appropriate—it is necessary. The data collected under OMB Control Number 1820-0600 are central to ensuring that IDEA fulfills its promise of a free appropriate public education for children with disabilities.</p> <p>These data support informed decision-making, protect student rights, promote fiscal responsibility, and drive continuous improvement across state and local systems. Maintaining these requirements affirms a national commitment to transparency, accountability, and—most importantly—to the educational success of our most vulnerable children.</p> <p>For these reasons, I strongly urge the Department and OMB to approve the extension of this information collection without modification.</p>	
1 2	12/9/25	Julie Clark		ED-2025-SCC-0976-0005	ED-2025-SCC-0976-0005 miy-pdu7-7vj5	Are kids are not being taught fundamental skills. They are being indoctrinated it's time to get back to reading writing and arthmetics. Get back to the basics.	<p>OSERS appreciates the submitter's comments.</p> <p>This collection focuses on IDEA requirements that SEAs and LEAs must implement and maintain but not submit to the Department. Therefore, there are no revisions that could be made to this collection based on the comments received.</p>
1 3	2/9/26	Autism Alliance		Mailed in after the due date, but OCDO asked that we consider the comment.	Mailed in after the due date, but OCDO asked that we consider the comment.	 <p>FW: Docket No. ED-2025-SCC-0976_</p>  <p>2026.0202 Autism Alliance Public Com</p>	<p>OSERS appreciates the support and recommendations regarding SEA and LEA data reporting to the Department.</p> <p>This collection focuses on IDEA requirements that SEAs and LEAs must implement and maintain but not submit to the Department. Therefore, there are no revisions</p>

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