

National Study of Special Education Spending

Supporting Statement for OMB Clearance Request for Full-Scale Study Recruitment Activities (Phase 1) Part A: Justification

April 2026

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Introduction

The Institute of Education Sciences (IES), within the U.S. Department of Education (ED), requests clearance from the Office of Management and Budget (OMB) for a new data collection, the [National Study of Special Education Spending](#) (NSSES). The study will produce estimates for what is spent on special education services for students with disabilities (SWDs), both overall and by disability category, including expenditures made by states, districts, and schools. The NSSES also will provide policymakers and special education administrators with an up-to-date understanding of the key factors that influence special education spending, what this spending pays for, and to what extent federal appropriations from the Individuals with Disabilities Education Act of 2004 (IDEA) cover special education spending.

IES contracted with the American Institutes for Research® (AIR®) and its partner organizations—the National Opinion Research Center at the University of Chicago (NORC) and Allovue, a PowerSchool company (Allovue)—to conduct this study (hereafter referred to as the study team). The study team is currently pilot testing the NSSES’s planned recruitment strategy, survey instruments, and other data collection procedures in an OMB-approved pilot study ([OMB# 1850-0952 v.10, v.12](#)). Preliminary results from the pilot test’s recruitment phase informed the methods and procedures described in this submission.

This is the first of two OMB clearance packages. This package is for clearance to contact state education agencies (SEAs), local education agencies (LEAs), and schools in summer and fall 2026 to request their cooperation and participation in the study and to collect the directory and enrollment data needed to sample students. A future package will request clearance to collect data from teachers, service providers, and LEA and SEA staff through survey instruments and administrative data files during the 2026-27 school year.

A.1. Circumstances Making Collection of Information Necessary

Federal, state, and local policymakers and education leaders have a critical need for current information about what is spent to provide special education and related services to SWDs and the sources of funding used to pay for this spending. More than 7 million SWDs—about 15 percent of students enrolled in public K–12 education—receive special education services under IDEA (National Center for Education Statistics [NCES] 2024). IDEA has long committed the federal government to covering a portion of the added costs of these services. However, the best national estimates of what is spent by states, districts, and schools to educate SWDs are nearly 25 years old, and much has changed since then in the number and composition of SWDs and the policies and conditions under which they are served.¹

¹ For additional information about the Special Education Expenditure Project (SEEP), see Chambers, J.G., Parrish, T., Shkolnik, J., Levine, R., and Makris, F.E. (2003), *The Purpose and Design of the Special Education Expenditure Project*, <https://www.air.org/sites/default/files/Purpose-Design-of-SEEP.pdf>. Since the SEEP there have been (1) changes to the prevalence and characteristics of the SWDs who receive special education services and their overall level of need (NCES 2023); (2) shifts in where and how SWDs are served, particularly the time they spend in general education classrooms (McFarland et al. 2019); (3) updated federal and state policies and procedures that prioritize early intervention and shared responsibility

Although IDEA has not been reauthorized since 2004, current federal proposals signal the possibility for significant shifts in how special education funding may be structured in the coming years. Proposals under consideration—such as providing states and districts greater flexibility through block-grant-style funding or directing IDEA dollars to families through education savings accounts (ESAs)—would change how funds flow, who makes spending decisions, and how services may be accessed. Evaluating these potential approaches requires detailed, up-to-date information on current spending patterns, the primary cost drivers across disability categories, and the federal, state, and local revenue sources used to support these expenditures. Without a clear national baseline, it is difficult to model the fiscal implications of alternative funding structures or anticipate the ways in which different entities might be affected by new policies. The estimates produced by this study—overall and by disability category—will provide essential grounding for analyzing and planning for potential changes to IDEA funding in the evolving policy environment.

In addition to supporting policy analyses for potential federal funding redesigns, the NSSES will directly inform policy discussions about the extent to which IDEA appropriations meet the long-standing goal of covering 40 percent of the excess cost of special education. At present, policymakers lack a clear national picture of both the total amount spent to provide special education services and how that spending is apportioned across federal, state, and local funding systems. By producing nationally comparable estimates of spending and the sources used to pay for it, the NSSES will establish the baseline needed to assess progress toward the 40 percent target and to evaluate what it would take – under current conditions – for federal funding to align with this goal.

Specifically, the NSSES will develop national estimates of special education spending with the level of precision needed to inform federal policy. Producing accurate national estimates requires collecting data from a representative national sample of districts, schools, and students so that the study reflects the experiences of SWDs nationwide. A large sample is necessary because special education spending varies across students with different disabilities and levels of need. IDEA recognizes 13 federally defined disability categories, and even within these categories students differ substantially in their needs and the services they receive (e.g., Barret et al. 2020; Cleveland and Markham 2024; Jackson et al. 2022; Maurer et al. 2024; McCabe 2024).

Differences in need and the types and amounts of services provided translate into substantial variation in what is spent to educate SWDs. The U.S. Department of Education’s Special Education Expenditure Project (SEEP), conducted during the 1999-2000 school year, documented significant spending differences across disability categories, underscoring the importance of developing updated, disability category-specific spending estimates. However, financial data currently collected by districts and schools cannot be disaggregated in ways that yield reliable estimates of per student spending by disability category. For this reason, the NSSES will field surveys that are designed to capture the

between general and special education for educating SWDs (Bailey 2019, 2021); (4) increased expectations that individualized education programs (IEPs) meet the substantive standard set by *Endrew F. v. Douglas County School District* (Re-1, 137 S. Ct. 988; Library of Congress, n.d.) and are aligned with general education content standards (Harr-Robins et al. 2013); and (5) opportunities for SWDs to attend charter schools (Rhim et al. 2019).

necessary detail to determine whether differences in spending across disability categories, student needs, and geographic contexts are meaningful.

This study is being carried out as part of IES's National Assessment of the Individuals with Disabilities Education Act, which was mandated by Congress to collect information that can inform future updates to the law (20 U.S.C. § 664(b)(1)).

A.2. Purposes and Uses of the Data

Study Purpose

Overall, the NSES will provide policymakers and special education professionals with estimates of how much is spent to educate SWDs and the sources of funding that are used to pay for special education spending. NCEE identified four broad questions that guide the study's design and analysis:

1. How much is spent to educate SWDs? How does this compare to spending on their peers who do not receive special education?
 - 1a. What is spent overall to educate SWDs?
 - 1b. What portion is for special education and related services?
 - 1c. How does spending to educate an SWD compare to spending for a typical general education student (GENED)?
2. To what extent do spending amounts reflect students' needs versus where they live or go to school?
 - 2a. How does spending vary according to students' disability and/or by their functioning and development?
 - 2b. Does spending vary by other student characteristics, such as race/ethnicity, grade level, type of school, or extent of time spent in a general education classroom?
 - 2c. Are district characteristics—size, urbanicity, poverty rate, type—a factor in spending?
3. What does special education spending pay for, and what role does IDEA play?
 - 3a. What is spent on different types of resources, such as personnel, equipment, transportation, and technology?
 - 3b. What portion goes to administration and compliance with IDEA's legal and administrative requirements?
 - 3c. Do these types of special education spending differ according to student characteristics or where they go to school?
 - 3d. What do IDEA funds pay for, compared with other federal and nonfederal sources?
4. To what extent is the federal contribution to special education funding meeting its target?
 - 4a. What share of spending is paid for by IDEA funds?

4b. What other revenue sources are used to pay for special education?

4c. How does the federal share of special education spending vary among states and LEAs?

Uses of the Data

The NSSSES data collection is designed to generate comprehensive, nationally representative evidence on the resources and spending used to provide special education services to students with disabilities—and the federal, state, and local funding sources used to support those expenditures—so that the resulting information can be used both for immediate reporting and for future research. The study will collect data from a large, representative sample of school districts, schools, and school staff nationwide through surveys of district officials and school-based personnel, supplemented by collecting detailed district-level financial data. These data will be used to produce national and subgroup spending estimates, identify key cost drivers, and support other policy-relevant analyses in a series of summative reports. In addition, the study will prepare a restricted-use dataset to enable qualified researchers to conduct further analyses beyond the initial reports. Because no existing national data source captures special education resource use, spending, and funding streams at the level of detail needed for these purposes, the NSSSES approach is necessary to fill this critical evidence gap.

This OMB clearance request covers only the recruitment and sampling efforts that lead up to the study's data collection activities. A separate OMB clearance package will be submitted for the study's data collection activities.

Exhibit A-1 describes the activities for which approval is requested in this OMB clearance package, including key information about the anticipated recruitment period, sample size, primary contacts, mode of data collection, and purpose for engaging SEAs, LEAs, and schools in these efforts. IES and the study team will request OMB approval for the NSSSES data collection plan and survey instruments in spring 2026, after they complete the OMB-approved pilot that is testing and refining the study's procedures ([OMB# 1850-0952 v.10, v.11, v.12](#)). Exhibit A-2 lists the additional data collection activities that will be included in this later OMB clearance package.

Exhibit A-1. Key recruitment elements for SEAs, LEAs, and schools for which clearance is requested

Key recruitment elements	SEA	LEA	School
Anticipated recruitment period	July 15 to October 30, 2026	July 31, 2026, to January 31, 2027	October 30, 2026, to June 30, 2027
Sample size	51	1,250	3,750
Primary	State Education Officer	Superintendent and	Principal and designated

Key recruitment elements	SEA	LEA	School
respondent contacts	and Special Education Officer	designees	school coordinator
Respondent activities	Receive notification with information about the study	- Review and respond to information about the study (methods, burden, incentives), letter requesting cooperation, and FERPA^a and data-sharing agreement form - Identify LEA and school contacts who will coordinate study response - Prepare and submit rosters for students who receive special education and those who do not	- Receive notification with information about the study - Discuss study participation with NORC team member and identify a school coordinator
Mode of data collection	N/A. No data are requested from SEAs during the recruitment period	Upload student roster to secure project site on IES's data center	N/A. No data are requested from schools during the recruitment period
Purpose of activity/use of data	Ask SEAs to encourage sampled LEAs in their state to participate in the study	- Recruit sampled LEAs to participate in the study - Obtain student rosters for sampling	- Recruit sampled schools to participate in the study - Identify a school coordinator who will be the point of contact for coordinating student-level data collection

^a Family Educational Rights and Privacy Act of 1974, 20 U.S.C. § 1232g.

Exhibit A-2. Additional data collection activities to be included in a later OMB clearance package

Key data collection elements	SEA resources survey	LEA program survey	LEA Financial Officer survey	LEA financial data	Student Resources Survey (SRS)
Anticipated reporting period	Winter 2026/Winter 2027	Winter/Spring 2027	Summer/Fall 2027	Summer/Fall 2027	Winter/Spring 2027
Sample size	51	1,250	1,250	1,250	10,949 SWDs 2,223 GENEDs
Primary contact for data collection	State Special Education Officer	LEA Special Education Administrator	LEA Chief Financial Officer	LEA Chief Financial Officer	School coordinator
Primary respondent(s)	State Special Education Officer or designee	LEA Special Education Administrator	LEA Chief Financial Officer	LEA Chief Financial Officer	School staff knowledgeable about sampled student
Mode of data collection	Web-based survey	Web-based survey	Web-based survey	File upload	Web-based survey
Purpose/use of data	Provides information about an SEA's special education spending and state funding for special education	Provides information about an LEA's special education programs and collects data required for cost estimation about the number and type of SWDs served in the LEA	Provides information about what an LEA spent to administer its special and general education programs, the revenues used to pay for this spending, and information about average labor costs that is needed for cost estimation	Provides information from a district's general financial ledger that is needed to estimate LEA- and school-level special education administrative spending	Provides information about a sampled student's educational program, including the setting where the services were provided and the types and amounts of resources that were used to provide special and general education

A.3. Use of Technology to Reduce Burden

During the study's initial recruitment phase (covered by this OMB clearance request), the study team will use technology in two primary ways: (1) to contact and communicate with SEA, LEA and school staff during study recruitment, and (2) to collect student roster information needed for sampling.

Communications with LEAs and School Staff

The study team will identify e-mail contact information for all SEA, LEA, and school points of contact and respondents. Initial letters (**Attachment A**) will be printed and mailed; however, all subsequent written communication will be sent via e-mail, and all data will be collected electronically. During the recruitment period, this process includes the following:

- **E-mail Follow-Up (Attachment B).** The study team will follow up with LEAs and schools by batch e-mail to confirm receipt of initial materials, restate the request for participation, and request contact information for the Special Education Director, Chief Financial Officer, and school coordinator.
- **Study Information and FAQ (Attachment C).** This document includes information about the study's purpose, who is conducting the study, data security, the data requested, the study schedule, roles and responsibilities, payments for participation, OMB information, and who to contact with questions.

A study information website will also be available at <https://air.org/project/nsses>.

Collecting Student Roster Information

The study team will collect student roster information from LEAs to sample students with and without disabilities for the SRS survey data collection. During the recruitment period, this process includes the following:

- **Directory Data Request (Attachment D).** LEAs will be asked to provide student directory and enrollment data, which the study team will use to sample schools and students. LEAs will be provided a list of specific information to include and will upload data files directly to an ED-authorized system, the IES Data Center (IESDC), for processing by the study team. Additional information on the confidentiality and security of the IESDC appears in section A.10.
- **Family Educational Rights and Privacy Act (FERPA) Agreement (Attachment E).** The study team will send this agreement to LEAs to set the terms and conditions that allow for the transfer of information that is subject to state and federal confidentiality laws and to ensure that the required confidentiality is always maintained.

A.4. Efforts to Avoid Duplication

The last nationally representative data on special education spending were collected more than 25 years ago through the SEEP study (1999–2000); no other current source provides comparable information.

The NSSES will not duplicate existing federal collections; instead, it will provide the only current national estimates of special education spending at the level of detail needed for policymakers. ED’s recurring school finance collections—most notably NCES’s CCD School District Finance Survey (F-33), which gathers annual finance data from virtually all LEAs—do not support reliable, disaggregated estimates of special education spending by student disability classification (Griffith 2016; Kolbe 2019). Historically, F-33 expenditure categories were too broad to clearly separate general and special education spending. Although experimental special education items were added beginning in 2020–21, early results showed substantial missingness and data quality concerns, limiting their usefulness for accurate estimation (Kolbe and Dhuey 2024). In addition, because these items collect only aggregated totals, they cannot be used to produce the per-student spending estimates—overall and by disability category—required to inform federal and state policy.

The study also will use existing administrative data to obtain district, school, and student context and demographic information rather than collecting these details through additional survey items. Districts and schools will provide student-level and enrollment data (e.g., race/ethnicity, sex, age) by uploading the information in the format in which it already exists in their records, without creating new variables or manipulating files. The study also will draw on data that states already report to the federal government to minimize burden and enhance the analyses. For instance, data submitted to ED’s Office of Special Education Programs (OSEP)—including states’ Annual State Application Under Part B of IDEA—will supply information on how states use federal funds to support special education and related services.

A.5. Methods to Minimize Burden on Small Businesses and Other Small Entities

The NSSES does not involve data collection from small businesses or entities.² Burden on all respondents (i.e., LEA and school administrators) will be minimized wherever possible. The recruitment letters and study materials are designed to be clear and informative, and they have been tested and refined during the current pilot test of the study design.

A.6. Consequences of Not Collecting Data

Federal, state, and local policymakers and education leaders urgently need up-to-date national estimates of special education spending to inform their funding policies and budgets. At all levels, special education represents a considerable investment, with the federal contribution directing billions of dollars to states and local communities. Without this information, ED and Congress will not have accurate and timely spending data to determine how IDEA funds are being spent, what the funds pay for, or the extent to which resource allocation decisions by states and localities align with best practices and IDEA’s policy goals.

² Note that some private or charter schools could be considered small businesses; however, these schools are not expected to bear any additional burden beyond what is asked of public schools. In addition, because of the voluntary nature of the study, they can decline participation.

A.7. Special Circumstances

No special circumstances for this information collection are anticipated.

A.8. Consultations Beyond the Agency

Federal Registry Requests

On January 28, 2026, a 60-day notice was published in the *Federal Register* (Vol. 91, No. 18, p. 3714) to solicit public comments on this proposed information collection. Comments and the agency's responses to those comments can be found in Attachment F of this submission. No public comment resulted in a change to the agency's proposed plans for collection.

Contemporaneously with the submission of this package to OMB, a 30-day notice was published in the *Federal Register* (Vol. XX, No. XX, p. XXXX) on April XX, 2026.

Consultations Outside the Agency

The National Center for Education Evaluation and Regional Assistance (NCEE) sought input from 12 external consultants for the study. These consultants participated in a 1-day meeting held in June 2024 that focused on the study design, including sampling, recruitment, incentives, content, measurement, and data collection. A subgroup of these consultants also provided expert review of the study instruments. The consultants included practitioners and researchers in the fields of special education and school finance; their names and affiliations are shown in exhibit A-3.

Exhibit A-3. NSES study design consultants and affiliations

Consultant	Affiliation
Elizabeth Dhuey	University of Toronto
Aisha Humphries	formerly Chicago Public Schools
Jennifer King Rice	University of Maryland
David Knight	University of Washington
Lucky Mason-Williams	SUNY Binghamton
Margaret McLaughlin	University of Maryland Professor Emerita
Sara Menlove Doutre	WestEd
Chris Needham	SUNY Plattsburgh
Bobby Richardson	Pearl Public School District, formerly Mississippi Department of Education
Kenneth Shores	University of Delaware
Rebecca Sibilia	EdFund
Zelphine Smith-Dixon	Rockdale County Public Schools

NCEE also briefed professional organizations and disability policy organizations with an interest in special education spending, including the National Association of State Directors of Special Education (NASDE), the Consortium for Constituents with Disabilities, the Council for Exceptional Children (CEC), and the Council of Administrators for Special Education (CASE). The goal was to obtain additional perspectives on the information needs in the field, particularly with respect to costs.

A.9. Payment or Gifts to Respondents

The recruitment activities for which this clearance is requested include sending materials to SEAs, LEAs, and schools that reference participation incentives (see Attachments A and C). *However, no payments will be made for the recruitment activities covered by this clearance*, nor will there be any prepaid incentives. LEAs and survey respondents will be offered postpaid incentives for study participation – including completing the study’s surveys and providing financial data files – which will be described in a future information clearance request. Payments will be in the form of electronic gift cards for individual survey respondents and respondents providing the LEA financial data files; LEAs will receive either electronic gift cards or checks payable to LEAs to offset the overall cost of producing the roster information needed for sampling and coordinating data collection activities.

Although participation incentives will be paid after the study is completed, the amounts are referenced in the materials that will be used during the recruitment activities covered by this clearance request. Exhibit A-4 presents the proposed incentive amounts and conditions for the future study.³ The recommended incentive amounts are the same as were used in the recent pilot study.

Participation incentives are necessary and warranted for the NSSSES’ future data collection activities and will be evaluated by LEAs and staff during the study’s recruitment phase as part of their decision to participate in the study. The NSSSES requires detailed, and therefore burdensome, data requests from LEAs, schools, and staff to obtain accurate spending estimates. NCEE undertook several research activities to ensure that the NSSSES data collection maximizes accuracy while minimizing respondent burden, including cognitive interviews to streamline survey design, a technical advisory group, innovative financial transactions analyses, and a pilot study (currently in the field). Nonetheless, the perceived burden on LEA and school staff will be a critical factor for administrators when deciding whether to participate in the study. The incentive amounts proposed provide this recognition and value.

Specifically, the LEA institutional data request gathers critical data needed for sampling and spending estimation, whereas the school-level SRS requires not only detailed responses but also coordination among multiple school staff respondents. Given the many demands and outside pressures faced by LEAs, schools, and their staff, it is essential that they feel their burden is recognized and the time spent

³ Incentive amounts referenced in the recruitment materials are comparable to those used for NCES’s ECLS-K:2024 in [OMB# 1850-0750 v.30](#). The NSSSES is very similar to the ECLS-K:2024 in its nested design, with similar levels of cooperation and data collection burden needed from schools, school coordinators, and teachers. In addition, the NSSSES design includes an LEA component, and school participation is contingent on LEA participation.

engaging in study activities is valued. The study design varies the incentive amounts paid to study participants to account for differences in burden. Participating staff include the LEA financial teams, which need to provide detailed financial data; the school coordinator, who will act as a survey reporter, study liaison, and study motivator/champion; and the teachers and service providers, who will need to report student-level data. School teachers and service providers will spend more time completing surveys for students with high service needs than for those with low service needs.

A review of the literature supports the need to offset the cost of the time spent by study participants, especially financial compensation. Singer and Ye (2013) concluded that “incentives increase response rates to surveys in all modes, including the web, and in cross-sectional and panel studies” and that “monetary incentives increase response rates more than gifts.” Singer and Ye also noted that prepaid incentives are most effective but can be difficult to provide for web surveys. Because the NSSES is web based and uses nested recruitment (LEA, school, teachers/providers) and multiple possible respondents, we propose promised incentives that respondents will select in real time via a question at the end of the online survey. This approach is used for other IES studies with nested designs, including NCES’s ECLS-K:2024.

Exhibit A-4. Incentive strategy for NSSES LEAs and schools

LEA incentive strategy

Recipient	Amount	Condition
LEA (institutional)	\$500	LEA staff produce the roster information needed for sampling and coordinate data collection activities. The full amount will be paid when LEA-level data requests are completed.
LEA Financial Officer	Up to \$120	LEA Financial Officers will receive \$120 for providing financial data files and completing the LEA Financial Officer survey. The LEA Financial Officer generates the financial data files needed for estimation, including information from the LEA’s general ledger and transaction journal accounting databases. The incentive amount assumes that the task of pulling together these files will take up to 90 minutes of time. The full amount (\$60) will be paid when the LEA fiscal data files are received. LEA Chief Financial Officers will also be asked to complete a survey that collects additional information on LEA finances and personnel costs. The survey will take about 90 minutes to complete. The full amount (\$60) will be paid within 2 weeks of

Recipient	Amount	Condition
		completion of the survey.
LEA Special Education Director	\$60	LEA Special Education Directors will be asked to complete a survey about their district's special education programs. The survey will take up to 90 minutes to complete. The full amount will be paid within 2 weeks of a respondent's completion of the survey.

School incentive strategy

Recipient	Amount	Conditions
School coordinator	\$150-\$200, depending on level of survey response at school	The school coordinator will serve as the primary point of contact at sampled schools for coordinating the Student Resources Survey (SRS) with school staff. On average, there will be 5 sampled students per school with a cap of 20 students, and each student's SRS will require one or more school staff to complete. The school coordinator will identify which staff need to complete the surveys and follow up with them to ensure high response rates. When data collection concludes at the school, the school coordinator will be paid \$150 if 70 percent of the Student Resources Surveys are completed for the school, plus a bonus of \$50 if all surveys are completed.
School staff responding to SRS	\$60	School staff will complete the SRS for one or more sampled students. Each survey can take 45-90 minutes to complete depending on the services a student receives. The full amount will be paid within 2 weeks of a respondent's completion of the survey.

A.10. Assurances of Confidentiality Provided to Respondents

The study team will assure institutions and individuals participating in the study that all data provided may only be used for statistical purposes and may not be disclosed or used in identifiable form for any other purpose, except as required by law (20 U.S.C. § 9573 and 6 U.S.C. § 151). The study team will conduct all data collection activities in full compliance with ED regulations and requirements to maintain the confidentiality of data obtained on private persons and to protect the rights and welfare of human research subjects, per the Education Sciences Reform Act of 2002 (Title 1, Part E, Section 183). Data collection activities also will be conducted in compliance with other federal regulations, including the Privacy Act of 1974, P.L. 93-579, 5 U.S.C. § 552a; the Family Educational Rights and Privacy Act of 1974, 20 U.S.C. § 1232g, 34 C.F.R. Part 99; and related regulations, including but not limited to 41 C.F.R. Part 1-1 and 45 C.F.R. Part 5b.

The laws pertaining to the collection and use of personally identifiable information (PII) will be clearly communicated in correspondence with states, LEAs, schools, and staff. Letters and informational materials will be sent to district and school staff describing the study and the extent to which respondents and their responses will be kept confidential. This information also will be included in any research applications required by participating LEAs.

AIR and its research partners will protect the full privacy and confidentiality of all data collected for recruitment activities and will use the data for research purposes only. When reporting the results, the

study team will present data only in aggregate form, so that individuals and provider sites are not identified. The study team also will take the following steps to protect confidentiality in the NSSES:

- All data collection staff at AIR and any data collection subcontractors will complete required background clearances (i.e., e-QIP) and will sign agreements that emphasize the importance of confidentiality and that specify employees' obligations to maintain it. This security clearance requires completing personnel security forms, providing fingerprints, and undergoing a background check.
- All members of the study team with access to the data will be trained and certified on the importance of confidentiality and data security. Staff will receive training regarding the meaning of confidentiality, particularly as it relates to handling requests for information and providing assurance to respondents about the protection of their responses.
- All data containing PII will be stored in ED's IESDC. The IESDC environment is an ED-authorized system at the Federal Information Security Management Act (FISMA) Moderate level and is housed in Amazon Web Services' government-only environment GovCloud. The data will be stored on drive volumes that are fully encrypted with AES-256, including drive backups. Access to the IESDC is limited to IES staff and contractors with a 5C clearance or higher, and accounts have complex password requirements and mandatory multifactor authentication. Access to PII will be limited to a small number of individuals who have a need to know this information.
- AIR has established a data governance and security plan for all information collected as part of the NSSES. The data governance/security plan specifies procedures for managing these data, including external requirements related to security (e.g., applicable regulations); roles and responsibilities of study team members, including processes for onboarding new staff, monitoring and granting access to data, and managing subcontractor compliance; processes for information security, including accessing, storing, and transferring data; and processes for data quality control and data disposition. AIR's Information Security Office has approved the appropriateness of all elements of the data governance/security plan.
- To ensure that study participants are properly protected, AIR's Institutional Review Board will review the study's design protocols, data governance/security plan, and all data collection instruments and procedures. In addition, the AIR study team requested a Certificate of Confidentiality (CoC) from the National Institutes of Health (NIH), which was issued to the study in January 2025.⁴ A CoC protects the privacy of participants in research studies collecting information that, if disclosed, could have adverse consequences, such as damage to participants' financial standing, employability, or reputation. The CoC prohibits the disclosure of identifiable information gathered or used during the study in response to legal demands, such as a subpoena.
- A system of records notice is currently being prepared for this study. ED expects to publish the notice by spring 2026.

⁴ NIH considers CoC requests for non-Health and Human Services (HHS)-funded research.

Materials sent to SEAs, LEAs, and schools will describe the ways in which respondents and their responses will be kept confidential, including the following assurance of confidentiality statement: “Information collected for this study comes under the confidentiality and data protection requirements of the Institute of Education Sciences (the Education Sciences Reform Act of 2002, Title I, Part E, Section 183). Responses to this data collection will be used by the U.S. Department of Education, its contractors, and collaborating researchers only for statistical purposes. Individual respondents will never be identified, and responses to survey questions may not be disclosed or used in identifiable form for any other purpose, except as required by law (20 U.S.C. § 9573 and 6 U.S.C. § 151).”

Student directory and enrollment information will only be used to sample schools and students for the study and will be stored on ED’s secure IESDC. These data will be securely destroyed when no longer needed for the purposes specified in 34 C.F.R. § 99.35.

A.11. Justification of Sensitive Questions

To fulfill the purpose of the future NSSSES, it is necessary to identify all resources used to provide special education, general education, and related services to a nationally representative sample of students with disabilities in grades K–12 who have an Individualized Education Program (IEP), as well as all resources used to provide general education to a comparison sample of students without disabilities. Therefore, obtaining information about potentially sensitive topics, such as whether a student receives special education and their disability type, is central to the study.

A.12. Estimates of Respondent Burden

Exhibit A-5 details the respondent burden for the *recruitment activities included in the current request*. The recruitment activities include reviewing and updating contact information, identifying appropriate respondents, communicating about the study, and preparing and submitting materials needed for student sampling. The estimated hour burden is 11,051, and the total cost burden is \$522,703.

The estimated burden in Exhibit A-5 is only for the recruitment activities for which clearance is sought in this submission. Note that the FAQ document in Attachment C, which will be shared with study respondents during recruitment activities, previews for respondents the total estimated burden for *all* study activities and therefore reports greater total burden hours than appear in Exhibit A-5.

Exhibit A-5. Estimated respondent burden for recruitment activities

Recruitment unit	Number of recruitment units	Number of responding units	Hours per responding unit	Total burden in hours	Estimated hourly wage	Total cost burden
SEA	51	51	1	51	\$53	\$2,703
LEA	1,250	1,000	8	8,000	\$53	\$424,000
School	3,750	3,000	1	3,000	\$32	\$96,000
Total	5,051	4,051	NA	11,051	NA	\$522,703

NOTE: NA = Not applicable. Wage estimates are based on the May 2024 National Occupational Employment and Wage Statistics data for occupation code 11-9030 (Education and Childcare Administrators, for SEA and LEA reporting) and 25-0000 (Educational Instruction and Library Occupations, for school reporting), maintained by the Bureau of Labor Statistics (<https://data.bls.gov/oes/#/industry/000000>).

A.13. Estimates of Other Costs to Respondents

There are no costs to respondents for participating in the NSSes recruitment, other than the time needed to complete recruitment-related activities. No equipment, printing, or postage charges will be incurred by the participants.

A.14. Estimates of Annualized Costs to the Federal Government

The total cost for the study recruitment is approximately \$3,000,000 across 12 months.

A.15. Explanation for Program Changes or Adjustments to Burden

This clearance request covers a new information collection only.

A.16. Plans for Tabulation and Publication of Results

The study will culminate in a published restricted-use data file available to researchers and one or more reports that provide a comprehensive overview of the study's findings in relation to the four RQs. In an appendix or supplement to the report(s), NCEE will publish data documentation that describes the recruitment activities, the sample design, and the achieved sample. The project schedule (exhibit A-6) calls for recruitment to begin July 15, 2026. Recruitment is expected to be completed within 12 months of OMB approval. Data collection is scheduled for completion in Fall 2027, and the first study findings report is anticipated in 2028.

Exhibit A-6. Project schedule

Activity	Anticipated start date	Anticipated end date
SEA notification and recruitment	7/15/2026	10/30/2026
LEA recruitment	7/31/2026	1/31/2027
School recruitment	10/30/2026	6/30/2027
Publication of data documentation	TBD	12/31/2028

A.17. Approval to Not Display OMB Expiration Date

No exemption from the requirement to display the expiration date for OMB approval of the information collection is being requested for the NSSES recruitment.

A.18. Explanation of Exceptions to the Paperwork Reduction Act

No exceptions to the certification statement apply to the NSSES recruitment.

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