

The purpose of this document is to provide the public with a concise and accessible explanation and rationale for the proposed revisions to 1820-0578: IDEA Part C State Performance Plan (Part C SPP) and Annual Performance Report (Part C APR), collectively SPP/APR. The proposed revisions would take effect with the States' FFY 2026 SPP/APR to be submitted in February 2028. The explanation is accompanied by two appendices. Appendix A sets out the legal requirements, i.e., elements of the SPP/APR that are required by statute and may not be changed. Appendix B describes prior significant revisions to the SPP/APR.

PROPOSED REVISIONS TO THE PART C SPP/APR

The Office of Special Education Programs (OSEP) is proposing revisions to the current Part C SPP/APR. This information collection package would also establish a new Part C SPP consistent with IDEA section 616(b)(1)(C) which requires each State to review its SPP at least once every six years. The SPP would cover the reporting years from FFY 2026 through FFY 2031. The Office of Special Education and Rehabilitative Services (OSERS), which includes OSEP, is committed to improving early childhood, educational, and employment outcomes and to raising expectations for all people with disabilities, their families, their communities, and the nation. A key responsibility of OSEP is to ensure States' compliance with the Individuals with Disabilities Education Act (IDEA).

OSEP acknowledges that States, local early intervention service (EIS) programs/providers, and parents know best the needs of their children, and the systems and structures used to support them. Therefore, OSEP held listening sessions at the 2025 OSEP Conference on the current SPP/APR and suggestions for improvement. The proposed revisions to the SPP/APR are responsive to stakeholder input and reduce burden for States by more closely aligning the SPP/APR to statutory requirements, eliminating duplicative reporting, and further streamlining reporting requirements in the online reporting tool while maintaining strong accountability. Changes proposed to the present Information Collection Request are aimed at more closely aligning Federal monitoring mechanisms (such as the SPP/APR) to IDEA's statutory requirements and increasing transparency. The proposed changes also reflect priorities to collect and disseminate meaningful data, improve outcomes, and increase parent choice.

Additionally, in order to obtain input from data submitters and stakeholders regarding Indicator 4 (Family Outcomes) OSEP has included directed questions via the attachment. While many of these questions are directed to State Lead Agencies (LA) data submitters, comments from all stakeholders on these topics are encouraged.

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The proposed revisions are as follows:

Current Indicator / Scope of Change	Proposed Revisions
1: Timely Services	OSEP proposes to revise the instructions for this indicator to remove the requirement that States provide detailed information about the correction of noncompliance. Under this proposed change, States would no longer be required to: (1) provide detailed information about the timely correction of child-specific and regulatory/systemic noncompliance; (2) report on the extent to which noncompliance was subsequently corrected (more than one year after identification); or, (3) provide an explanation regarding why the State did not issue any written findings of noncompliance (if the State reported less than 100% compliance for the previous reporting period) including how the State verified, prior to issuing a finding, that the EIS program/provider has corrected each individual case of child-specific noncompliance and is correctly implementing the specific regulatory requirements. States already report detailed information about the correction of noncompliance under Indicator 12. Therefore, to reduce burden and eliminate States being required to report duplicative information, OSEP is proposing to revise the instructions under each compliance indicator to remove the requirement to report on the correction of noncompliance and only require States to report on the correction of noncompliance under Indicator 12.
2: Natural Environments	No Change
3: Early Childhood Outcomes	OSEP proposes revising Outcome A to align with Outcomes B and C so that all three areas consistently emphasize learning and development. Social and emotional development in early childhood is essential for school readiness and long-term success, as positive early behaviors support stronger outcomes throughout life. The revised outcome indicators are designed to reflect children’s learning trajectories from infancy through preschool, highlighting continuous growth and development across time.
4: Family Outcomes	Improving outcomes for infants and toddlers with disabilities and their families can be made more effective by building the capacity of parents and caregivers and ensuring that families of children with disabilities have meaningful opportunities to support their child’s participation in

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	daily routines and activities at home, in the community, and at school. States collect family outcomes data as a means of improving services and results for children with disabilities, as well as to know if the State is supporting families in meeting this goal. In order to facilitate greater transparency and drive system improvement, OSEP believes that States must provide information about data collection and report how the data are being used to improve services and outcomes for children with disabilities. OSEP proposes to revise the instructions to require States to: (1) describe how the data are collected; (2) provide a link to the survey, if a survey is used to collect the data for this indicator; and (3) describe how the data are utilized to promote meaningful family involvement in order to improve services and outcomes for infants and toddlers with disabilities. Further, to reduce burden and provide States with greater flexibility in analyzing their data, OSEP proposes removing the requirement that States must include an analysis of the extent to which the demographics of the infants or toddlers for whom families responded are representative of the demographics of infants and toddlers enrolled in the Part C program. Most States currently report that their indicator C4 data are representative of the demographics of the infants and toddlers enrolled in the Part C program. Thus, OSEP is shifting the focus of the States' analysis from representativeness of the response data, to how the data are used to improve services and outcomes for all infants and toddlers with disabilities and their families.
5: Child Find – Birth to 1	No Change
6: Child Find – Birth to 3	No Change
7: 45-day Timeline	OSEP proposes to revise the instructions for this indicator to remove the requirement that States provide detailed information about the correction of noncompliance. Under this proposed change, States would no longer be required to: (1) provide detailed information about the timely correction of child-specific and regulatory/systemic noncompliance; (2) report on the extent to which noncompliance was subsequently corrected (more than one year after identification); or, (3) provide an explanation regarding why the State did not issue any written findings of noncompliance (if the State reported less than 100% compliance for the previous reporting

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	period) including how the State verified, prior to issuing a finding, that the EIS program/provider has corrected each individual case of child-specific noncompliance and is correctly implementing the specific regulatory requirements. States already report detailed information about the correction of noncompliance under Indicator 12. Therefore, to reduce burden and eliminate States being required to report duplicative information, OSEP is proposing to revise the instructions under each compliance indicator to remove the requirement to report on the correction of noncompliance and only require States to report on the correction of noncompliance under Indicator 12.
8: Early Childhood Transition	OSEP proposes to revise the instructions for this indicator to remove the requirement that States provide detailed information about the correction of noncompliance. Under this proposed change, States would no longer be required to: (1) provide detailed information about the timely correction of child-specific and regulatory/systemic noncompliance; (2) report on the extent to which noncompliance was subsequently corrected (more than one year after identification); or, (3) provide an explanation regarding why the State did not issue any written findings of noncompliance (if the State reported less than 100% compliance for the previous reporting period) including how the State verified, prior to issuing a finding, that the EIS program/provider has corrected each individual case of child-specific noncompliance and is correctly implementing the specific regulatory requirements. States already report detailed information about the correction of noncompliance under Indicator 12. Therefore, to reduce burden and eliminate States being required to report duplicative information, OSEP is proposing to revise the instructions under each compliance indicator to remove the requirement to report on the correction of noncompliance and only require States to report on the correction of noncompliance under Indicator 12.
9: Resolution Sessions	No Change
10: Mediations	No Change
11: State Systemic Improvement Plan (SSIP)	OSEP proposes to revise the instructions for this indicator to remove references to reporting requirements that were applicable in the initial phases of the SSIP but are no longer applicable

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	because States have been in various stages of implementation for approximately ten years. Stakeholders may refer to prior year Measurement Tables for historical information. Additionally, OSEP is proposing revisions to the instructions for clarity related to stakeholder engagement, implementation of evidence-based practices, and measures of fidelity. OSEP will also streamline the reporting requirements in the online reporting platform to reduce reporting burden for States by removing 11 of the 32 (34%) qualitative data fields in this Indicator that are no longer relevant or are redundant.
12: General Supervision	OSEP proposes to revise the instructions for this indicator for clarity regarding where States report on the correction of noncompliance prior to the issuance of written notification of noncompliance. Specifically, if a State reports less than 100% compliance for any compliance indicator for the previous reporting period (e.g., for the FFY 2026 SPP/APR, the data for FFY 2025), but did not identify any findings of noncompliance, the State is required to provide, in this indicator, an explanation of why the State did not issue any written findings of noncompliance and include how the State verified, prior to issuing a finding, that the EIS program/provider has corrected each individual case of child-specific noncompliance and is correctly implementing the specific regulatory requirements. Prior to this revision, States meeting this condition were required to report this information under each applicable compliance indicator. To eliminate duplication and reduce burden, OSEP has revised the instructions for this indicator to require States to report on the correction of noncompliance only in this indicator and as noted earlier, has removed the requirement to report this information under the other compliance indicators (Indicators 1, 7, and 8).

Appendix A: Legal Requirements

SPP/APR: Sections 616(b)(1) and 642¹ of the Individuals with Disabilities Education Act (IDEA or Act) require that each State have in place an IDEA Part C SPP that evaluates the State's efforts to implement the requirements and purposes of IDEA Part C and describes how the State will improve such implementation. IDEA sections 616(b)(1)(C) and 642 require each State to review its SPP at least once every six years. Consistent with IDEA sections 616(b)(2)(C)(ii) and 642, each State must report annually to the public on the performance of each early intervention service (EIS) program located in the State on the targets in the SPP and to the Secretary on the State's performance under the SPP, *i.e.*, an APR.

Indicators: As required by the Act and implementing regulations² the SPP is comprised of quantifiable indicators, and qualitative indicators as needed, in the following areas –

- The provision of appropriate early intervention services in natural environments;
- State exercise of its general supervisory authority including –
 - o Child find
 - o Effective monitoring
 - o The use of resolution sessions and mediation; and
 - o A system of transition services as defined in IDEA section 637(a)(9)

The SPP also includes indicators that address areas critical to ensuring improved developmental results and functional outcomes for infants and toddlers with disabilities. See IDEA sections 616(a)(4) and 642.

Targets: The State must establish measurable and rigorous targets for each indicator that reflect improvement over the State's baseline for results indicators and 100% compliance for compliance indicators. See IDEA sections 616(b)(2) and 642.

Improvement: Pursuant to IDEA sections 616(b)(1)(A) and 642, the SPP must include a description of how the State will improve its implementation of IDEA.

Information Regarding Slippage Where the Targets Are Not Met:

States must include in their APRs brief information on the reasons for slippage (an explanation of slippage in indicators where the State did not meet its target. 2 CFR § 200.329(c)(2)(ii) (replacing 34 CFR § 80.40(b)(2)).

Appendix B: Prior Significant Milestones or Revisions

2005

¹ Consistent with IDEA section 642, sections 616, 617, and 618 shall, to the extent not inconsistent with IDEA Part C, apply to Part C, except that references to a State educational agency are considered to reference a State's Part C lead agency, any reference to local educational agency, educational service agency, or a State agency is considered to reference an early intervention service provider; and any reference to the education of children with disabilities or the education of all children with disabilities is considered to reference the provision of appropriate early intervention services to infants and toddlers with disabilities.

² See IDEA sections 616(a)(3) and (4), and 642; and 34 CFR §303.700(d).

The IDEA Part C SPP/APR package (OMB number 1820-0578) was originally approved by OMB in 2005. The original IDEA Part C SPP/APR package contained 14 indicators covering the areas required by the Act and other key areas. Some indicators corresponded to the statutory language in IDEA sections 616(a)(3) and 642, while others were developed to respond to general priority areas. In December 2005, each State submitted its SPP, including targets for FFY 2005 through FFY 2010.

2011

In 2011, to meet the requirement set forth in IDEA sections 616(b)(1)(C) and 642 that the State review its SPP at least once every six years, and in the absence of IDEA reauthorization, OSEP proposed to make no major changes to the SPP and to maintain the indicators as written. Therefore, with its FFY 2011 SPP submission, each State extended its original SPP targets and improvement activities for FFY 2011 and FFY 2012.

2012

Beginning in 2012, the Department reconceptualized its IDEA accountability system. That system, *Results Driven Accountability* (RDA), is aligned to best support States in improving results for infants and toddlers with disabilities. Previously, the Department's accountability system, including the SPP/APR, was heavily focused on compliance with statutory and regulatory requirements, with limited focus on how the requirements impacted outcomes and results for infants and toddlers with disabilities. RDA balances the focus on improved educational results and functional outcomes for infants and toddlers with disabilities, while considering compliance as it relates to those results and outcomes. The SPP/APR is a critical component of RDA.

In 2012, OSEP eliminated two indicators in the SPP/APR where OSEP determined that the information submitted was duplicative of data submitted by States through another OMB-approved information collection (EDFacts), thereby reducing reporting burden. Additionally, these indicators were not required by the statute, and, because the data are available to the Department through the other data collections, the Department could continue to use the data to evaluate a State's performance as part of the Department's determination process. As a result, States were no longer required to report in the SPP/APR on Indicators 10 (State Complaint Timelines) and 11 (Due Process Hearing Timelines).

Also in 2012, OSEP requested and was granted permission by OMB to make several significant technical amendments to the approved SPP/APR package, which reduced reporting burden. Beginning with the FFY 2011 SPP and APR (submitted in February 2013), States –

- Were not required to report on progress and must only report on slippage for a particular indicator if the State does not meet its target for that indicator.
- Could have one set of improvement activities that covers all indicators instead of reporting improvement activities under each indicator.
- Were required to report on improvement activities for indicators where they did not meet their targets.
- Were not required to provide data for Indicator 14 with their initial submissions.

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With its FFY 2013 APR, each State submitted its second SPP, including targets for FFY 2013 through FFY 2018.

2014

OSEP made revisions in 2014 to the SPP/APR information collection for FFY 2013 through FFY 2018 based on the following principles:

- Alignment with the RDA vision and its goals.
- Reduction of reporting burden by requiring primarily what is required by the statute and regulations or vital to ensuring improved educational results and functional outcomes.
- Retaining consistent data sources and measurements as much as possible.

The following revisions to the SPP/APR information collection, which were approved in 2012 and 2014, were incorporated into the FFY 2013-FFY 2018 SPP/APR:

1. Combine the SPP and APR into one document.
2. Collect SPP/APR through an online submission system that includes the capability to respond to the SPP/APR electronically.
3. Report on slippage only if the State does not meet its target for the reporting year.
4. Develop streamlined and coordinated systems descriptions.
5. With the FFY 2013 SPP/APR, States were no longer required to report on Improvement Activities for each indicator. Rather States were required to submit a comprehensive State Systemic Improvement Plan (SSIP) through new qualitative Indicator 11. While the primary focus of the SSIP is on improvement of outcomes for infants and toddlers with disabilities and their families, the State must also address in its SSIP how the State will use information from its general supervision systems to identify areas that need improvement.
6. Eliminated prior SPP/APR Indicators 9 (General Supervision) and 14 (data). Prior Indicator 9 required a State to report on the effectiveness of its general supervision systems by reporting on the percent of findings of noncompliance identified in the prior fiscal year and corrected as soon as possible but in no case later than one year from identification in the reporting fiscal year for the APR. The requirement to report under each compliance indicator on the correction of State-identified noncompliance remained. Prior Indicator 14 required a State to provide data on the timeliness and accuracy of its data reported to OSEP under IDEA sections 616 and 618. Instead, the OSEP now calculates each State's compliance with the requirement to submit timely and accurate IDEA section 618 data and SPP/APR data under IDEA section 616.

2017

OSEP made revisions to provide States with flexibility in reporting and to improve data quality. These revisions included revising the instructions for:

- Indicator 3 (Early Childhood Outcomes) to provide more clarity on which infants and toddlers with disabilities should be included in the calculation to report only on those

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infants and toddlers with disabilities that received at least six months of Part C services and to enable OSEP to better evaluate the extent to which States are providing complete data for the indicator;

- Indicator 4 (Family Outcomes) to encourage States, where the State has not addressed representativeness or has reported that the response data were not representative, to provide more detail on the effectiveness of the State's efforts to collect more representative data, and to move up the timeline for reporting on representativeness;
- Indicator 8C (Early Childhood Transition Conference) to clarify which children should be included in the denominator; and
- Indicators 1 (Timely Provision of Services), 7 (45-day Timeline), and 8A, 8B, and 8C (Early Childhood Transition) to require States, in cases where the State reported less than 100% compliance on a compliance indicator(s) in the previous reporting year, to explain why the State did not identify any findings of noncompliance during the previous reporting period even though data indicated less than 100% compliance.
- Indicator 11 (State Systemic Improvement Plan) to provide more clarity on SSIP reporting.

2020

OSEP made revisions in 2020 to the SPP/APR information collection for FFY 2020 through FFY 2025 based on the following principles:

- States, early intervention service programs and providers, and parents know best the needs of their infants and toddlers, and the systems and structures used to support them;
- Providing State and local partners with as much flexibility and support as possible so they can ensure that their infants and toddlers' needs are being met;
- Elevating parent voice in early intervention services provided under IDEA Part C.

These revisions included:

- revising Indicator 4 (Family Outcomes) to require States to include race/ethnicity in the analysis of representativeness in addition to one other category, analyze response rates and describe strategies to increase response rates, and describe the metric for representativeness;
- removing the requirement in Indicator 5 (Child Find: Birth - 1) and Indicator 6 (Child: Find: Birth - 3) for States to compare data to the national average;
- aligning the due date of the SSIP with the other indicators in the SPP/APR submission.

2023

OSEP made revisions focused on ensuring LAs are responsible for the oversight of early intervention services and examining inequities in the implementation of IDEA. These revisions included:

- revising the instructions for Indicators 5 (Child Find Birth to 1) and 6 (Child Find Birth to 3) to require that States reporting slippage for these indicators must include the results of

its root cause analysis of child find identification rates, including reviewing data (if available) on the number of children referred, evaluated, and identified.

- reestablishing Indicator 12 (General Supervision) as a separate reporting requirement. This indicator measures the effectiveness of the LA's systems of general supervision in ensuring the identification of noncompliance and correction of noncompliance in a timely manner.