

March 2026

Attachment

**Individuals with Disabilities
Education Act (IDEA) Part B
State Performance
Plan/Annual Performance
Report (SPP/APR):
Directed Questions**

OMB No. 1820-0624

Introduction

This attachment contains specific topics for which the Department would like to obtain input from data submitters and stakeholders.

While many of these questions are directed to State educational agency (SEA) data submitters, comments from all stakeholders on these topics are encouraged.

Part B SPP/APR

1) Indicator 1: Graduation – change disaggregation by exit category to ensure greater transparency

This indicator measures the graduation rate for students with disabilities. Specifically, it measures the percent of youth with individualized education programs (IEPs) exiting special education due to graduating with a regular high school diploma. The data source for this indicator is the same data States report in the IDEA Section 618 Part B Exiting data, using the definitions in ED*Facts* file specification FS009.¹ The current data collection disaggregates data based on the reason a student who was in special education at the beginning of the reporting period, is no longer receiving special education at the end of that period using the following exit categories that factor into the calculation of Indicator 1: graduated with a regular high school diploma,² graduated with a state-defined alternate diploma, received a certificate, reached maximum age, and dropped out. Stakeholders have raised concerns that some students with disabilities may be awarded a regular high school diploma based on requirements that are less rigorous than those applied to students without disabilities, and that the current exiting data do not fully capture this practice. While the “received a certificate” category includes students who earned a high school diploma but did not meet the same graduation standards as students without disabilities, it also includes students who received certificates of completion, modified diplomas, state-defined alternate diplomas, or GEDs. To address these concerns, the Department is considering adding a separate exit category in the exiting data collection specifically for students who received a high school diploma but did not meet the same graduation standards as students without disabilities. This additional disaggregation would improve the precision and transparency of graduation-related data for students with disabilities. More accurate data would also strengthen the Department’s ability to target technical assistance and monitoring activities effectively.

¹ Any changes made to this indicator that are outside of the reporting categories/permitted values in FS009 will need to be approved through the information collection package process for the Annual Mandatory Collection of Elementary and Secondary Education Data through ED*Facts* (OMB 1850-0925, expires 09/30/2028).

² As defined in 34 CFR 300.102(a)(3)(iv), the term regular high school diploma means the standard high school diploma awarded to the preponderance of students in the State that is fully aligned with State standards, or a higher diploma, except that a regular high school diploma shall not be aligned to the alternate academic achievement standards described in section 1111(b)(1)(E) of the ESEA. A regular high school diploma does not include a recognized equivalent of a diploma, such as a general equivalency diploma, certificate of completion, certificate of attendance, or similar lesser credential.

Questions

- a) How would the data collection and reporting processes need to change to report the count of students with disabilities who received a high school diploma, but did not meet the same standards for graduation as those for students without disabilities?
- b) What challenges are anticipated in reporting exiting data at this level of disaggregation?
- c) What is the burden associated with collecting and reporting these data at the local educational agency (LEA) and SEA levels?
- d) Which school year would the State anticipate being able to begin reporting these data using this further disaggregation?

2) Indicator 5: Least Restrictive Environment (LRE) – change aggregation by settings to obtain more information and ensure that data element is not driving student placement

This indicator measures the settings in which school-aged children aged 5 who are in kindergarten through 21 receive special education and related services. Specifically, it measures the percent of children with IEPs aged 5 who are enrolled in kindergarten and aged 6 through 21 served: (A) inside the regular class 80% or more of the day; (B) inside the regular class less than 40% of the day; and, (C) in separate schools, residential facilities, or homebound/hospital placements. The data source for this indicator is the same data States report in the IDEA Section 618 Part B Child Count and Educational Environments data, using the definitions in ED*Facts* files specification FS002.³ The current data collection does not collect disaggregated data on school-aged children with disabilities receiving special education and related services in the regular class for durations outside of 80% or more of the day, 40% through 79% of the day, and less than 40% of the day. OSEP has received concerns from stakeholders indicating that current data collection practices and reporting requirements may inadvertently influence placement decisions for children with disabilities. Specifically, the existing disaggregation of educational environments and child count data, along with the expectation that targets for Indicator 5A increase over baseline data, could be interpreted as conveying an expectation that all children with disabilities should be educated in the regular class for at least 80 percent of the school day. Under the IDEA, however, placement decisions must be made on an individualized basis, reflecting each child's unique needs and parental input, determined through the development of the child's IEP. To address the concerns raised by stakeholders, the Department is interested in collecting data on the settings in which school-aged children receive special education and related services using an expanded breakdown of time spent in the regular class. Specifically, the Department is interested in using deciles to collect data on the time spent in the regular class (e.g., 40% through 49% of the day, 50% through 59% of the day, 60% through 69% of the day, and 70% through 79% of the day). This further disaggregation of the data would provide greater precision and transparency on data related to school aged-children who receive special education and related services in the regular class, as well as help shift the focus from one setting (inside the regular class 80% or more of the day) to service provision across a broader range of settings. Additionally, increasing the precision of the data reported on LRE will allow the Department to better target its technical assistance and monitoring activities.

³ Any changes made to this indicator that are outside of the reporting categories/permitted values in FS002 will need to be approved through the information collection package process for the Annual Mandatory Collection of Elementary and Secondary Education Data through ED*Facts* (OMB 1850-0925, expires 09/30/2028).

Questions

- e) How would the data collection and reporting processes need to change to report the count of school-aged children receiving special education and related services in the regular class using an expanded breakdown of time spent in the regular class (e.g., 40% through 49% of the day, 50% through 59% of the day, 60% through 69% of the day, and 70% through 79% of the day)?
- f) What challenges are anticipated in reporting child count/educational environments data at this level of disaggregation?
- g) What is the burden associated with collecting and reporting these data at the LEA and SEA levels?
- h) Which school year would the State anticipate being able to begin reporting these data using this further disaggregation?
- i) How might reporting the number of school-aged children who are receiving special education and related services in the regular class using these further disaggregated reporting categories ensure placement decisions are made on an individualized basis?

3) Indicator 8: Parent Involvement

This indicator measures the percent of parents with a child receiving special education services who report that schools facilitated parent involvement as a means of improving services and results for children with disabilities. The Department believes that the information families provide is critical to helping States evaluate the effectiveness of their systems. It is this parent and State partnership that will ensure high expectations and improved outcomes for each child with a disability and their families. As such, the Department is interested in ways to make the data more meaningful and ensure it drives improvement of State systems.

Questions

- a) How can the collection and reporting of parent involvement data be improved to ensure that States are receiving and addressing feedback from parents who have pursued, or may pursue, dispute resolution options under Part B of the IDEA?
- b) How can the collection and reporting of parent involvement data be improved to make the data more meaningful for all stakeholders?
- c) How can the collection and reporting of parent involvement data be improved to ensure States are receiving data that can be used to strengthen program implementation and improve the outcomes of children with disabilities?
- d) What challenges exist in collecting and reporting these data?