

Directed Questions

Indicator 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 EDFacts 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 diploma², graduated with a state-defined alternate diploma, received a certificate, reached maximum age, and dropped out. Stakeholders have raised concerns that some

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 EDFacts (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.

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.

- 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 State educational agency (SEA) levels?
- d) Which school year would the State anticipate being able to begin reporting these data using this further disaggregation?

Comments: OSEP received several responses from commenters on the directed questions regarding Indicator 1. Commenters stated that, if the Department pursued these changes, State & district systems would require updates. Commenters consistently pointed to the need to revise student information systems (SIS), graduation coding schemas, transcript data fields, and EDFacts mappings to capture whether a student with a disability received a diploma without meeting the same standards applied to students without disabilities, including vendor changes and coordinated guidance from SEAs to LEAs. Several commenters suggested creating a separate exit category for “regular diploma via different standards,” alongside clear, operational definitions that distinguish accommodations from modified standards and alternate pathways to avoid inconsistent State interpretation and non-comparable data. Commenters shared that graduation standards and pathways vary widely, limiting comparability and

utility of the data. Commenters also indicated that they anticipated an increase in transcript reviews, schedule and audit checks, and potential disputes over graduation determinations and diploma status if such distinctions are formally tracked. Commenters also expressed concern that practices which allow children with disabilities to graduate with a regular high school diploma without meeting the same requirements as their peers may encourage students to graduate once alternative criteria are met, potentially truncating services they remain eligible to receive and requested OSEP ensure more granular reporting does not incentivize premature exits. Commenters stated that collecting data in this way would result in ongoing burdens for training staff, conducting transcript reviews, and implementing verification procedures so reporting is reliable. Commenters also stated that smaller and rural districts would feel disproportionate strain. Additional burden associated with collecting the data included revisions to SIS platforms, graduation coding, IEP documentation alignment, and EDFacts interfaces, which commenters shared would represent significant vendor and data-engineering effort, spanning multiple systems per state. With regard to when States anticipated being able to make such changes, commenters recommended phasing after federal guidance and EDFacts updates and allowing time for vendor changes and statewide training.

Most commenters anticipate multiple years before reliable implementation and data reporting would be possible.

Discussion: OSEP appreciates the commenters' responses to the directed questions and will take them into consideration as work continues to provide guidance and assistance to States aimed at improving the quality and usability of IDEA Part B data.

Indicator 5

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 EDFacts

files specification FS002³. 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

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).

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.

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?

Comments: OSEP received several responses from commenters on the directed questions regarding Indicator 5. Commenters indicated that expanding Indicator 5 reporting to include narrower time-in-regular-class bands would require substantial operational changes, including student-level schedule calculations, updates to SIS platforms and vendor configurations, added data entry and verification, staff training, and tighter alignment between IEP documentation and educational environment reporting. Several commenters urged clear, uniform definitions of “regular/general classroom,” guidance on co-taught classes and pull-out services, and steps to reduce state-to-state variability that could distort LRE reporting. Several commenters warned that finer granularity could become de facto compliance targets that influence placements rather than individualized FAPE decisions and recommended safeguards and a phased rollout. Numerous commenters

preferred strengthened federal guidance, technical assistance, and monitoring over expanding Indicator 5 reporting, questioning whether more precise decile data would improve outcomes.

Commenters reiterated that reporting categories should be descriptive rather than prescriptive and asked for technical assistance to emphasize individualized decision-making over implicit pressure toward upper-level deciles. Several commenters emphasized that individualized placement requires measuring language and communication access and cautioned that time-in-seat deciles alone do not ensure FAPE. These commenters proposed exempting deaf and hard of hearing students from numeric LRE targets, adding a language-access dimension, or reporting their placements separately. Commenters representing States and districts anticipated significant burdens and challenges, including system revisions, vendor modifications, updated coding guidance, and substantial training. These commenters noted that LEA staff would need to compute precise percentages of time in general education for each student across fluctuating schedules and pull-out services, increasing labor for data entry and verification. Finer disaggregation would heighten data-quality and validation demands, require alignment between IEP documentation and educational environment reporting, and necessitate additional reasonableness checks and quality assurance. Commenters further noted that more categories would

yield small cell sizes that may require suppression and complicate target setting under the SPP/APR. Most also stated the workload would be substantial with limited direct benefit to student services or outcomes. Regarding timing, several commenters representing SEAs reported they would need at least two years to retool systems and train districts, plus an additional lag year to publish valid results, with most estimating they could not report sooner than three years after final guidance. Specific projections included decile reporting beginning with SY 2029–2030 and the first APR due in early 2031.

Discussion: OSEP appreciates the commenters' responses to the directed questions and will take them into consideration as work continues to provide guidance and assistance to States aimed at improving the quality and usability of IDEA Part B data.

Indicator 8

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.

j) 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?

k) How can the collection and reporting of parent involvement data be improved to make the data more meaningful for all stakeholders?

l) 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?

m) What challenges exist in collecting and reporting these data?

Comments: OSEP received several responses from commenters on the directed questions regarding Indicator 8. Commenters suggested States establish dedicated, post-process feedback loops for families involved in mediation, due process, or State complaints, while keeping Indicator 8 inclusive of all families. They recommended also capturing input from families who

considered dispute resolution but did not complete it to surface barriers earlier and enable insight into de-escalation.

Commenters proposed short, accessible, voluntary surveys triggered at the close of a dispute and regional outreach sessions to gather qualitative insights. They emphasized clearer messaging about how feedback will be used to build trust and increase participation. To make the data more meaningful, commenters asked that feedback be explicitly linked to continuous-improvement cycles, technical assistance, and local relationship-building rather than treated solely as compliance reporting. They called for improvements in instrument design and accessibility—shorter surveys, mobile-friendly formats, translations and ASL, and multiple modes such as online, phone, paper, and community sessions—to widen participation and reduce burden. Commenters suggested requiring core survey elements for cross-state comparability while preserving local flexibility so findings remain interpretable and actionable at the State level. They recommended using survey results to guide State monitoring of LEAs and, when appropriate, to require targeted improvement plans, supported by accessible and complete information to strengthen implementation and outcomes. Commenters identified persistent challenges, including low response rates, survey fatigue, language and accessibility barriers, and limited trust that can skew participation. They cautioned that privacy and

anonymity constraints—especially in areas with few dispute resolution cases—limit disclosure and reduce the utility of disaggregated reporting. Finally, commenters highlighted methodological and systems burdens, including the need for multi-mode sampling, clear constructs, vendor and instrument updates, and training to ensure consistent, comparable data across LEAs.

Discussion: OSEP appreciates the commenters' responses to the directed questions and will take them into consideration as work continues to provide guidance and assistance to States aimed at improving the quality and usability of IDEA Part B data.