Docket: ED-2026-SCC-2806 State and EIS Record Keeping and Reporting Requirements under Part C

OSERS received 3 comments from a parent and advocate and two other individuals and OSERS appreciates the recommendations regarding State and EIS data reporting to the Department.

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

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

#	Date	Commenter	Comment ID Number	Tracking #	Comment	Analysis/Response
1	10/27/26	Anonymous Anonymous	ED-2026-SCC-2806-0006	mvr-kcxp-oz64	Robust recordkeeping is not merely an administrative exercise; it is the vital mechanism through which the U.S. Department of Education ensures that states fulfill their statutory obligation to provide a comprehensive, coordinated, and early intervention system for infants and toddlers with disabilities and their families (20 U.S.C. §§ 1431–1443). To maximize the value of this collection, I respectfully offer the following administrative law and practical policy recommendations: 1. Maximizing "Practical Utility" Through Timely Data Utilization (44 U.S.C. § 3501 et seq.) Under the Paperwork Reduction Act (PRA), information collections must possess "practical utility"—meaning the data collected must be actively utilized by the agency to fulfill its statutory purpose (5 CFR §1320.8). - Timely Oversight: Recordkeeping requirements fulfill their true legal purpose only when the resulting data is analyzed and deployed rapidly enough to catch service delivery delays, regional access gaps, and systemic bottlenecks before children age out of early intervention programs. - Proactive Correction: I encourage the Department to use this information collection to support real-time monitoring and early technical assistance, transforming reporting data into a tool for continuous program improvement. 2. Upholding Plain-Language Transparency and Information Quality Standards Data maintained and publicly reported under Part C must be accessible and meaningful to the primary beneficiaries of the statute: infants, toddlers, and their families. - Family-Centered Clarity: Consistent with Information Quality Act (IQA) principles, publicly reported data should be presented in clear, plain language with contextual trend analyses. Parents should not need advanced legal or statistical training to understand how well their state lead agency is serving eligible children. - Public Accountability: Clear reporting on key indicators—such as evaluation timelines, transition planning, and service delivery delays—ensures true public accountability and empowers families to navigate early intervention systems effectively. 3. Leveraging Technology to Streamline Burden Without Compromising Accountability	OSERS appreciates the submitter's comments. This collection focuses on IDEA requirements that States and EIS programs must implement and maintain but not submit to the Department. Therefore, there are no revisions that could be made to this collection based on the comments received.

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					Under 44 U.S.C. § 3506(c)(2)(A), agencies are tasked with minimizing administrative burden through modern information technology. = Reducing Provider Fatigue: Interoperable data systems should be leveraged to reduce redundant, manual data entry for early intervention professionals. Reducing administrative friction allows providers to dedicate more time to direct service delivery. - Preserving Safeguards: Efforts to streamline reporting must preserve the rigor of state oversight, ensuring that administrative efficiency and statutory accountability reinforce one another. 4. Evaluating Operational Reality Alongside Paperwork Compliance Under bedrock administrative law principles, evaluating systemic compliance requires examining whether a program functions as intended in practice. -Beyond Checklist Compliance: While verifying that states maintain required records is necessary, the ultimate measure of Part C compliance is whether eligible infants and toddlers receive timely, appropriate, and individualized services in real life. - Integrating Stakeholder Feedback: The Department should consistently consider qualitative family experiences alongside quantitative data to gain a complete picture of on-the-ground service delivery and system performance.	
2	10/27/26	Alec Snelling	ED-2026-SCC-2806-0005	mvr-2s8t-veti	To the Department of Education, Office of Special Education and Rehabilitative Services: I am a citizen in California. I support keeping the IDEA Part C records that protect families of infants and toddlers with disabilities: notice of legal services, lists of mediators and hearing officers, and written state complaint procedures and decisions. For a child under three, a slow dispute means lost developmental time. But this notice renews the collection unchanged for 56 state lead agencies at 4,268 hours, and it does not reflect a major change in who runs the program. ED's June 16, 2026 interagency agreement with HHS moves IDEA administration, monitoring, and data collection to HHS, yet the notice never mentions it and still lists ED and Rehabilitation Services Administration offices and contacts. 1. Which agency will use and oversee these records after the handoff to HHS? Please say so in the supporting statement and the 30-day notice, and update the offices, mailing address, and contacts to match. 2. Build these records digital-first in HHS systems: publicly posted online rosters of mediators and hearing officers, electronic filing of state complaints, and electronic decisions, with no new paperwork for states. 3. Re-estimate the burden using current dispute resolution data and a current wage rate, since the estimates have been carried forward unchanged through several renewals. 4. Tie complaint timeliness and outcomes to data states already submit, so families can see whether disputes over services are resolved on time.	OSERS appreciates the submitter's comments noting the errors between the package information posted on regulations.gov and the federal register notice. The information will be corrected in the 30-day federal register notice. This collection focuses on IDEA requirements that States and EIS programs must implement and maintain but not submit to the Department. Therefore, there are no revisions that could be made to this collection based on the comments received.

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					5. Report how much burden is cut once the records are fully digital. Thank you for the chance to comment. Respectfully, Alec Snelling California This comment was crafted with super intelligence (SI) support. Reconciliation Items A. The notice does not mention the June 16, 2026 ED-HHS interagency agreement moving IDEA administration, monitoring, and data collection to HHS, and it lists ED and Rehabilitation Services Administration offices and contacts. B. The notice states 56 annual responses, while the response column of the 2023 supporting statement table (the most recent public version) sums to 284. C. The mailing address names the Rehabilitation Services Administration's State Monitoring and Program Improvement Division, while Part C is administered by the Office of Special Education Programs. D. The notice lists the contact phone as (202) 245-6371, while the current OMB record lists 202-245-6061. E. The title refers to Record Keeping and Reporting, while the abstract states the requirements do not require reporting to the Secretary. F. The notice cites Part C as 20 U.S.C. 1431-1443, while Part C runs through 20 U.S.C. 1444.	
3	10/26/26	Patricia Sonnier	ED-2026-SCC-2806-0004	mvp-corl-or2o	Thank you for the opportunity to comment on Docket ED-2026-SCC-2806, State and EIS Record Keeping and Reporting Requirements Under IDEA Part C. I am submitting this comment as a parent with many years of experience navigating special education systems and as a special education advocate who supports other families of children with disabilities. My advocacy began as a parent trying to understand services, paperwork, progress, meetings, and whether the systems surrounding my child were actually doing what they were designed to do. That experience has taught me that good systems require good information, but information is only valuable when it is accurate, timely, understandable, accessible, and actually used. I support continuing the IDEA Part C recordkeeping and reporting requirements. First, I believe this information collection is necessary. Accurate records are essential to understanding whether children are receiving services in a timely manner, whether families are encountering barriers, and whether patterns exist that require state or federal attention. Second, timeliness matters. Information that is collected but not reviewed, analyzed, or made available until long after problems occur has limited value. I encourage the Department to consider whether the information collected can help identify service delays,	OSERS appreciates the submitter's comments. This collection focuses on IDEA requirements that States and EIS programs must implement and maintain but not submit to the Department. Therefore, there are no revisions that could be made to this collection based on the comments received.

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					access problems, or systemic concerns early enough for meaningful corrective action. Third, I encourage greater emphasis on the clarity and usefulness of the information for families. In my experience as both a parent and advocate, there can be a significant difference between what a system looks like on paper and what families experience in real life. The information collected should help answer practical questions such as: • Are eligible children receiving services when they need them? • Are families experiencing delays in accessing evaluation or services? • Are there patterns showing gaps in access? • Are states identifying recurring problems and responding to them? • Can families understand what the information being reported actually means? Parents should not need professional training in special education law, data analysis, or government reporting systems simply to understand how their state is serving children with disabilities. Whenever possible, publicly available information should be written in plain language, explain what measurements mean, show trends over time, identify areas of concern and improvement, and be easy for families to find. I also support using technology to reduce unnecessary administrative burden. Early-intervention professionals should be able to spend as much time as possible serving children and families rather than repeatedly entering the same information into multiple systems. However, reducing burden should not come at the expense of meaningful accountability. Efficiency and accountability can coexist. Finally, I encourage the Department to consider family experience as part of evaluating whether Part C systems are functioning as intended. Professionals understand how systems are designed to operate. Families can help explain how those systems actually function when someone is trying to access services. The question should not only be, “Did the state collect and report the required information?” It should also be, “Does this information help us determine whether children and families are actually receiving timely, meaningful, and appropriate early-intervention services?” I respectfully recommend that the Department: Continue the IDEA Part C recordkeeping and reporting requirements. Emphasize timely use of data to identify service and access problems. Improve the clarity and accessibility of public information for families. Use technology to reduce duplicative administrative burden without weakening accountability.	

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					Consider ways to better incorporate family experience when evaluating Part C systems. Behind every data point is a child and a family. Federal reporting should help make those families more visible and help identify where systems need to improve. Thank you for considering the perspective of parents and advocates as you review these requirements. Respectfully, Patricia Sonnier Parent and Special Education Advocate	