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New America is an independent, nonprofit policy and research organization. Our Disability Policy initiative works to improve and align education systems from early childhood through higher education to ensure equal access and opportunities for students with disabilities.

We appreciate the opportunity to provide feedback on the U.S. Department of Education's new data collection via the National Study of Special Education Spending (NSSES). In order to ensure that the data collection is sufficiently granular and representative to enable policymakers to make meaningful conclusions about special education resource needs, we have outlined elements that the Education Department can use in its forthcoming data collection.

**The Education Department should ensure that the study sample is representative of students with disabilities.**

The NSSES sample should be representative at the district and national levels of students with disabilities in terms of disability type; race and ethnicity; English language learner status; age; sex; family income level; and urban, suburban, or rural school location. In addition to students in kindergarten through twelfth grade, the sample should include preschool-aged children receiving services under IDEA Part B Section 619 and young adults ages 18 to 21 (or 22 where applicable) with individualized education programs (IEPs). A representative sample will maximize the utility of the study results for informing policies that support students with disabilities.

**The Education Department should collect data that is disaggregated by demographic characteristics.**

All collected data should be able to be disaggregated publicly by demographic information of the sample beyond their special education support, including race/ethnicity, English language learner status, income level, age, grade, primary and secondary (when applicable) disability category on IEP, related service intensity, placement type (e.g., general education classroom, special education classroom, etc.), and urban, suburban, or rural location.

**The Education Department should collect data related to specific accommodation expenditures.**

Special education and related service characteristics vary widely for students with disabilities and it is essential that the Department understands the underlying suite of services and characteristics of the population to identify potential cost drivers. We underline the following list of cost drivers to specifically account for this variability:

1. How many students have a dedicated aide
2. How many students are in a classroom with a general education teacher and/or special ed teacher and/or paraeducator(s), and at what percentage time those adults are in the classroom
3. How many students receive one-on-one related services and small-group related services, disaggregated by service type (e.g., physical therapy, occupational therapy, speech and language therapy, etc.)
4. How many students have transportation support on their IEPs, including a dedicated aide in the vehicle and use of specialized vehicles
5. How many students' IEPs include extended school year (ESY)
6. How many students have assistive technology, equipment, and other specialized resources on their IEPs (e.g., augmentative and alternative communication, Braille, raised-line drawings, adaptive lab equipment, accessible computers, assistive listening devices, adaptive playgrounds and physical education equipment)
7. How many students have reevaluations during the study year
8. How many students have a school psychologist, school social worker, counselor, behavioral specialist, and school nurse in their building and for what percentage of the time
9. How many students leave school for related services during the school day, with what frequency and duration, and whether school-provided transportation is used
10. How many students with IEPs also have Section 504 plans, and of those, how many include specialized medical services and/or equipment (e.g., medication, gastrostomy tube care, catheter care, etc.)

Separate accounting for each of these cost drivers will be more accurate if school-level budget officers are included in the fiscal officer survey along with district-level special education directors, which will provide a greater likelihood of granular spending data on specific students or services.

We thank the U.S. Department of Education for the opportunity to provide feedback on the National Study of Special Education Spending.

Sincerely,

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