



March 25, 2026

Ross Santy
Chief Data Officer
Office of Planning, Evaluation and Policy Development
U.S. Department of Education
400 Maryland Ave., SW
Washington, DC 20202

RE: ED-2026-SCC-0034

Submitted via regulations.gov

Dear Mr. Santy,

The Consortium for Constituents with Disabilities (CCD) Education Task Force is writing to support and recommend the request by the Institute of Education Sciences (IES), within the U.S. Department of Education (ED), for the Office of Management and Budget (OMB) to provide clearance for a new data collection, the National Study of Special Education Spending (NSSES). The CCD Education Task Force leads, advocates for, and monitors federal legislation and regulations that address the educational needs of the 10.25 million children and youth with disabilities and their families, including policy efforts affecting the funding and implementation of Federal laws such as the Individuals with Disabilities Education Act (IDEA), Every Student Succeeds Act (ESSA), Section 504 of the Rehabilitation Act of 1973 (Section 504), and the Americans with Disabilities Act (ADA).

CCD seeks completion of this project because the examination of expenditure data will help policymakers, school leaders, researchers, advocates, and others answer the most basic questions regarding how much money the United States is spending under the Individuals with Disabilities Education Act (IDEA). While we know how much federal funding Congress *allocates to states and how much states allocate to districts* to educate students with disabilities, *there is no available data on how much is actually being spent to educate nearly 8 million school-age students with disabilities.* An updated study will help answer critical questions so that local and state leaders can develop responsive budgets that anticipate and support those ultimately responsible for providing a free appropriate public education to students with disabilities.

By way of background, CCD helped promote and ensure the NSSES was included in Fiscal Year (FY) 2022 appropriations with bipartisan, bicameral support.¹ Further, several members of CCD actively engaged with IES on the development of the pilot and implementation of the data collection to ensure it was designed to include updates to the Special Education Expenditure Project (SEEP) and to gather the data we all need. CCD met with the IES team several times including inviting them to brief the Education Task Force about the NSSES. Specifically, CCD member organizations such as the Center for Learner Equity – whose focus is on charter

¹ See: Fiscal Year 2022 Senate Explanatory Statement for LHHS, (Page 277), https://www.appropriations.senate.gov/imo/media/doc/LHHSREPT_FINAL3.PDF and the House LHHS Report, (Page 284), <https://docs.house.gov/meetings/AP/AP00/20210715/113908/HMKP-117.-AP00-20210715-SD003.pdf>

schools, the Council for Exceptional Children – whose members include experts in special education from research to the classroom – and the Advocacy Institute – whose mission is to provide accurate information on special education funding and outcomes- and others have been directly involved as appropriate for external stakeholders to support the development and implementation of the project.

Due to the critical need for this updated data – and when the project was under threat of elimination by the Administration in 2025 – CCD met with and communicated in writing with Hayley Sanon, Principal Assistant Deputy Secretary, Office of Elementary and Secondary Education at ED, to urge continuation of NSSES. CCD has also communicated regularly with bicameral, bipartisan members of Congress’s appropriations and authorizing committees to support the federal investment in and launch of the project. As House appropriators said in the FY 2022 bill, ...“**no data has been collected by the Federal government on special education expenditures since 2004** when the Department released the Special Education Expenditure Project (SEEP).”²

CCD appreciates the opportunity to comment in support of the continuation of the NSSES. If we can provide additional information or support the project in any way, please contact one of the co-chairs listed below.

Sincerely,

CCD Education Task Force Co-Chairs:

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² Ibid.