

March 30, 2026

Matt Soldner
Acting Commissioner
National Center for Education Statistics
U.S. Department of Education
400 Maryland Ave, SW
LBJ, Room 5C125
Washington, DC 20202-1200

RE: Federal Register Docket ID: ED-2026-SCC-0034 — National Special Education Spending Study

Dear Commissioner Soldner,

On behalf of EdTrust, a nonprofit committed to advancing policies and practices to dismantle the racial and economic barriers embedded in the American education system, thank you for the opportunity to comment on the U.S. Department of Education’s proposed “National Special Education Spending Study.”

As an organization that is committed to using data and research evidence to advocate for fair school funding policies and equitable resource allocation for students of color, especially students of color with disabilities, we commend the Department for continuing its work to improve the field’s understanding of how federal, state, and local funding is being used to support the needs of students with disabilities.

At the same time, we encourage the Institute of Education Sciences (IES) to strengthen the study’s design by implementing sampling procedures to create more precise estimates of spending on students with disabilities, disaggregated by racial student groups. The Individuals with Disabilities Education Act (IDEA) explicitly requires states to monitor and address racial disproportionality in special education identification, placement, and discipline, in part, because decades of research and data tell us that students of color, especially Black and Native American students, experience disparities in these areas. The requirements in Section 618 of IDEA indicate that disaggregating data by race/ethnicity is a *primary* civil rights priority in special education. Therefore, it should be a primary priority in this study. Given this context, we recommend revising the study’s sampling procedures to improve the precision of estimates for individual groups of students of color, for example, by oversampling districts with high percentages of students of color. We believe that refining the study to ensure strong race-disaggregated estimates would significantly increase its value, without introducing a substantial burden.

Creating a clearer picture of how much, how well, and how equitably funds are invested will help guide better federal decision-making about IDEA funding and improve the federal government’s ability to fulfill IDEA’s promise of a free, appropriate public education for students with disabilities.

Thank you for your consideration and commitment to updating the field’s understanding of the amount and variation in funding used to educate and support students with disabilities across the country.

Sincerely,

EdTrust