



ASHA
American
Speech-Language-Hearing
Association

March 30, 2026

The Honorable Linda McMahon
U.S. Department of Education
400 Maryland Avenue SW
Washington, DC 20202

RE: Comment on Agency Information Collection Activities; National Study of Special Education Spending (NSSES)

Dear Secretary McMahon:

On behalf of the American Speech-Language-Hearing Association (ASHA), I write to express strong support for and provide comments on the proposed National Study of Special Education Spending (NSSES).¹

ASHA is the national professional, scientific, and credentialing association for 247,000 members, certificate holders, and affiliates who are audiologists; speech-language pathologists (SLPs); speech, language, and hearing scientists; audiology and speech-language pathology assistants; and students. Our members serve millions of children and adults with communication disorders across the nation's schools, hospitals, clinics, and other settings, including a substantial number of children with disabilities who receive services under the Individuals with Disabilities Education Act (IDEA).

ASHA strongly supports the NSSES and commends the Institute of Education Sciences (IES) and the National Center for Education Statistics for undertaking this critical data collection effort. The absence of comprehensive, current national data on special education spending has long hampered effective policy development, resource allocation, and advocacy on behalf of children with disabilities. We offer the following comments in response to the Department's five questions.

1. Necessity of the Collection

ASHA strongly affirms that this collection is necessary and long overdue. The last comprehensive national study of special education expenditures was conducted over two decades ago. The special education landscape has changed dramatically since that time. The number and complexity of disability categories served under IDEA have evolved, service delivery models have diversified, and the costs of related services—including audiology and speech-language pathology—have increased substantially. Policymakers at the federal, state, and local levels currently lack the data needed to optimally assess whether IDEA Part B federal funding can cover the actual costs of providing a free appropriate public education (FAPE). The NSSES is essential to filling this critical gap and to strengthening the Department's ability to fulfill its statutory obligations under IDEA.

It is especially important that the NSSES produce estimates by disability category. A speech or language impairment is one of the most prevalent disability categories under IDEA, and students with communication disorders frequently receive speech-language pathology services as a related service across multiple disability categories. Category-level expenditure data will allow stakeholders to better understand the true costs of serving these students and advocate for appropriate funding levels.

2. Timely Processing and Use of the Information

ASHA urges the Department to establish, publicly communicate, and adhere to a clear timeline for data collection, analysis, and dissemination. Given that special education funding debates occur annually at the federal and state levels, timely release of NSSSES findings is critical to their utility. We recommend that IES commit to releasing preliminary findings within 18 months of data collection completion. We also recommend that IES publish final reports in accessible, user-friendly formats for advocates, families, providers, policymakers, and administrators—not solely researchers.

3. Accuracy of the Burden Estimate

ASHA recognizes that the Department's estimated burden of 11,501 annual hours across 5,051 respondents reflects careful planning. We encourage IES to conduct robust cognitive interviewing and pilot testing with a representative sample of respondents—including small, rural, and under-resourced districts—to validate the burden estimate. If the pilot reveals that burden is substantially higher than estimated, the Department should consider providing technical assistance, standardized data collection templates, and other supports to ensure accurate and efficient survey completion.

4. Enhancing Quality, Utility, and Clarity of Information Collected

ASHA offers the following recommendations to strengthen the quality and utility of the NSSSES:

- **Capture related service expenditures separately.** The survey should explicitly capture spending on IDEA-mandated related services, including audiology and speech-language pathology. These services represent a significant portion of special education spending and are frequently underreported when only aggregate “special education” cost categories are used.
- **Include staffing cost data.** Personnel costs—including salaries and benefits for audiologists and SLPs, special education teachers, and paraprofessionals—often represent one of the largest shares of special education spending. The NSSSES should capture these costs in sufficient detail to enable analysis of workforce-related expenditure trends and inform workforce planning and policy decisions.
- **Account for contracted and private provider services.** Many districts contract with private providers or educational service agencies to deliver audiology, speech-language pathology, and other related services. The NSSSES must capture these contracted expenditures to ensure a complete and accurate accounting of special education costs, as they are frequently omitted from district-level financial reporting.
- **Collect data across the continuum of placement settings and intervention frameworks.** Expenditure data should be collected across the full continuum of educational environments (e.g., general education classrooms, resource rooms, self-contained classrooms, separate schools, day programs, hospitals, home settings, residential facilities) to enable analysis of how placement decisions influence costs and service delivery. This includes collecting data on related service providers (e.g., audiologists, SLPs) and incorporating frameworks such as Multi-Tiered Systems of Supports (e.g., Response to Intervention, Positive Behavioral Interventions and Supports). Audiologists and SLPs play a key role in interventions, screenings, and consultations within these frameworks and should be explicitly reflected in data collection.

For example, the NSSSES should be designed to capture information such as: (1) How many audiologists and SLPs are involved in billing Medicaid? (2) How many staff, in addition to licensed SLPs, are providing speech-language pathology services? (3) What

percentage of special education services are delivered by audiologists and SLPs overall?

- **Disaggregate by student demographic characteristics.** To the extent feasible, expenditure data should be linkable to student demographic characteristics (e.g., disability category, race/ethnicity, English learner status, socioeconomic status) to illuminate various access trends in special education spending.

5. Minimizing Burden on Respondents

The Department should leverage existing administrative data to the greatest extent possible to reduce respondent burden. Many states already collect special education expenditure data through their Consolidated State Performance Reports and IDEA Part B Annual Performance Reports. IES should coordinate with state education agencies to maximize the use of existing data systems and avoid duplicative reporting requirements.

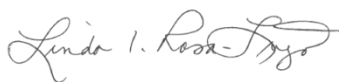
We also recommend that IES develop clear, standardized definitions and instructions for all data elements prior to survey launch. We recommend IES share these materials with respondents in advance to allow for adequate preparation. Providing a web-based data entry portal with built-in validation checks would further improve data accuracy while reducing errors and follow-up burden.

Conclusion

ASHA strongly supports the NSSSES and commends IES for initiating this important effort. Robust, current data on special education expenditures is essential to ensuring that all students with disabilities receive the services and supports they are entitled to under IDEA. We urge the Department to design the NSSSES to capture the full scope of special education spending—including audiology and speech-language pathology—and to release findings in a timely manner that can meaningfully inform federal and state policy decisions.

Thank you for the opportunity to provide these comments. ASHA appreciates the Department's efforts to gather public input and welcomes the opportunity to engage further in the development and implementation of the NSSSES. If you or your staff have any questions, please contact Bill Knudsen, ASHA's director of education policy, at bknudsen@asha.org.

Sincerely,



Linda I. Rosa-Lugo, EdD, CCC-SLP
2026 ASHA President

¹ U.S. Department of Education. (2026, January 28). Agency Information Collection Activities; Comment Request; National Special Education Spending Study. *Federal Register*. <https://www.federalregister.gov/documents/2026/01/28/2026-01624/agency-information-collection-activities-comment-request-national-special-education-spending-study>