

What are OSEP Indicator System?

The Office of Special Education Programs (OSEP) indicator system is basically the federal government's way of "grading" each state on how well it serves students with disabilities under IDEA (the Individuals with Disabilities Education Act).

Every state in America must report information to the federal government about how students with disabilities are doing in school.

OSEP created a list of "Indicators" — think of them like report card categories.

The federal government asks:

- Are students graduating?
- Are they dropping out?
- Are they learning?
- Are families involved?
- Are schools following the law?
- What kinds of classrooms are students placed in?
- What happens after students leave school?

States collect numbers and data every year and submit them to OSEP.

OSEP then reviews the information and decides whether the state:

- Meets requirements,
- Needs assistance,
- Needs intervention,
- or Needs substantial intervention.

The 17 Indicators in Plain Language

1. Graduation rates
2. Dropout rates
3. Test scores and participation
4. Suspensions and expulsions
5. Classroom placement/LRE
6. Preschool classroom placement
7. Preschool child progress
8. Parent involvement
- 9–10. Racial disproportionality
9. Identifying children who need services
10. Transition from early intervention to school
11. Transition planning for adulthood
12. What students do after high school
13. Complaint resolution
14. Mediation/dispute resolution
15. State improvement plans

Why This Matters for Deaf Students

The problem is that these indicators were mostly designed for disability systems in general — not specifically for Deaf children and language access.

So a state can technically “score well” even if Deaf children:

- do not have full language access,
- are isolated in mainstream classrooms,
- do not have Deaf peers,
- lack qualified teachers of the Deaf,
- or experience language deprivation.

The Most Controversial Indicator: #5

Indicator #5 measures where students are placed educationally.

The system assumes that being in a regular classroom more often is automatically better.

For Deaf students, this can be harmful because:

- placement alone does not guarantee communication access,
- inclusion without language access can become isolation,
- and Deaf children may lose opportunities for direct communication with peers and adults.

Many Deaf advocates believe:

- The best placement is the one where the child has full language access and can thrive socially, emotionally, and academically.
- Not simply: the child spends the most time near hearing students.

A Simple Analogy

Imagine judging whether a plant is healthy only by where it is placed in a garden — instead of asking whether it has sunlight, water, and healthy soil.

That is similar to how the current system sometimes evaluates Deaf education.

The Office of Special Education Programs (OSEP) are soliciting stakeholder feedback on the IDEA State Performance Plan/Annual Performance Report (SPP/APR) framework, which includes the Part B and Part C indicators used to evaluate states.

For IDEA Part C (ages 0-2), these indicators focus on babies and toddlers before they enter preschool.

11. Timely Services

Did eligible babies and toddlers receive services quickly after being identified?

2. Services in Natural Environments

Are services provided in places where children normally spend time (home, daycare, community settings)?

3. Infant and Toddler Outcomes

Are children improving in:

- social-emotional skills,
- communication,
- and early learning abilities?

4. Family Involvement

Did families help make decisions about services and supports?

5. Child Find (Birth–1)

Are infants being identified early enough?

6. Child Find (Birth–3)

Are toddlers being identified and referred for services?

7. 45-Day Timeline

Did the state complete evaluations and create service plans within 45 days of referral?

8. Transition Planning

Did children receive proper planning before moving from early intervention into preschool services?

9. Dispute Resolution

How well does the state handle complaints, mediations, and due process cases?

10. State Systemic Improvement Plan (SSIP)

What long-term improvement goals is the state working on?

11. Data Quality

Is the state reporting accurate and reliable data?

For IDEA Part B (ages 3–21), the indicators are:

1. Graduation
2. Dropout
3. State assessment participation/performance
4. Suspension/expulsion
5. Educational environments (Least Restrictive Environment/LRE)
6. Preschool environments
7. Preschool outcomes
8. Parent involvement
9. Disproportionate representation

10. Disproportionate representation by disability category
11. Child Find
12. Early childhood transition
13. Secondary transition IEPs
14. Postsecondary outcomes
15. Resolution sessions
16. Mediation
17. State Systemic Improvement Plan (SSIP)

The public comment opportunity many organizations circulated in spring 2026 was generally framed as input on the federal indicator system itself.

The Core Concern from Deaf Advocates

Many Deaf advocates are not saying accountability is bad.

They are saying:

- language access is missing,
- Deaf-specific outcomes are ignored,
- the measurements are incomplete,
- and states can look “successful” on paper while Deaf children still struggle.

NAD has responded in an official submission (see ASL and English links).