



Special Education in the State of Iowa

An Analysis of Critical Factors Associated with Educational
Outcomes for Students with Disabilities in Iowa

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Frequently Used Acronyms

The acronyms identified below are frequently used in this report.

- **AEA:** Area Education Agency
- **BEDS:** Basic Educational Data Survey
- **DOM:** Department of Management
- **EA:** Early ACCESS Integrated System of Early Intervention Services
- **ECO:** Early Childhood Outcomes
- **ELA:** English Language Arts
- **ESA:** Educational Service Agency
- **FAPE:** Free Appropriate Public Education
- **IDE:** Iowa Department of Education
- **IDEA:** Individuals with Disabilities Education Act
- **IEP:** Individualized Education Program
- **IFSP:** Individualized Family Service Plan
- **ISASP:** Iowa Statewide Assessment of Student Progress
- **NAEP:** National Assessment of Educational Progress
- **NCES:** National Center for Education Statistics
- **RPP:** Regional Price Parity
- **USEd:** US Department of Education

I. Executive Summary

Background: Educational Service Agencies in Iowa

Most states have a system of regional entities called educational service agencies that provide support to school districts.¹ In Iowa, these entities, known as Area Education Agencies (AEAs), are required to provide special education support services, special education instruction, media services, and educational services to Iowa's school districts.² AEAs also have discretion to provide additional services to school districts (e.g., shared purchasing programs, school business services).^{3,4} There are currently nine AEAs in Iowa.⁵

While having a system of educational service agencies is a feature of most states' education systems, Iowa's AEA system has several features that are unique:

- **AEAs are deeply involved in the provision of both special education support services and instruction for students with disabilities.** School districts are required to “cooperate” with AEAs “to provide an appropriate special education instructional program for each child who requires special education instruction.”⁶
- **The Iowa Department of Education and school district employees lack oversight functions to hold AEAs accountable for their performance.** Intentional and frequent state education agency and school district oversight of educational service agencies are seen in states that have better academic outcomes for students with disabilities.⁷
- **A portion of each school district's funding must go to the district's AEA regardless of the level and types of services the school district will use from the AEA,** and school districts cannot opt out of this requirement.⁸
- **Iowa spends \$5,331 more per-pupil on special education than the national average,** but Iowan students with disabilities perform academically below the national average.^{9,10}

¹ In this report, the terms “school districts,” “local school districts,” and “local education agencies (LEAs)” are synonymous.

² Iowa Code Chapter 273; 281 Iowa Administrative Code Chapter 72.

³ Iowa Code §273.2(5).

⁴ Iowa's Area Education Agencies (accessed on September 21, 2023), The Playbook for Iowa's AEAs. Available at: https://www.iowaaea.org/app/uploads/sites/25/2019/11/AEA_Iowa_Playbook_2p0_100121_Digital.pdf.

⁵ Iowa's Area Education Agencies (accessed on October 25, 2023), About Page. Available at <https://iowaaea.org/about/>.

⁶ Iowa Code §273.9(2).

⁷ While minimal oversight and accountability for AEAs lies with the Iowa State Board of Education and elected school district boards of directors, many states give oversight authority of educational service agencies to the entities that actually implement policies and provide direct education services. AEAs are currently subject to State Board oversight for accreditation (Iowa Code §273.10(3)) and budget development (Iowa Code §273.3(12)). School district boards of directors have the power to elect AEA boards of directors (Iowa Code §273.8).

⁸ Iowa Code §257.35.

⁹ US Department of Education, National Center for Education Statistics (accessed in September 2023), CCD Data Files 2019-2020, District Finance Survey (F-33). Available at: <https://nces.ed.gov/ccd/files.asp#Fiscal:1,LevelId:5,Page:1>.

¹⁰ US Department of Education, Institute of Education Sciences, National Center for Education Statistics, National Assessment of Educational Progress (NAEP), 2017, 2019, and 2022 Reading and Math Assessments. Available at: <https://www.nationsreportcard.gov/itemmaps/?subj=reading&grade=4>.

The Iowa General Assembly intended to create AEAs “to be an effective, efficient, and economical means of identifying and serving children from birth to age 21 who require special education services” required under the federal Individuals with Disabilities Education Act (IDEA).¹¹ This includes identifying students with disabilities (known as Child Find) and Individualized Education Program (IEP) development.¹² However, academic data shows that Iowa’s students with disabilities are struggling to reach academic proficiency in comparison to students with disabilities across the nation. Additionally, federal IDEA annual performance reports show that AEAs have contributed to issues of noncompliance on IDEA indicators tied to the provision of special education services. Iowa ranks as one of only 13 states to be placed in the “needs assistance (for two or more consecutive years)” category for IDEA Part C and is one of 22 states in the same category for IDEA Part B.^{13, 14}

Due these student proficiency gaps and operational issues, the Iowa Department of Management contracted with Guidehouse to (1) conduct a 50-state analysis of special education achievement and educational service agencies, (2) analyze the current state of Iowa’s special education system, particularly the state’s AEA system, and (3) develop recommendations to improve the outcomes of all of Iowa’s students with a focus on students with disabilities.¹⁵

As the analysis in this report will show, **Iowa’s special education structure gives AEAs vast control over the education of students with disabilities with little oversight from school districts and the Iowa Department of Education.** Despite centralized control of special education support services and instruction at AEAs, this system has not led to improved academic outcomes. Rather, academic outcomes from Iowa’s students with disabilities have declined over the last 20 years and are below average in comparison to the rest of the country.

Numbers Reveal that Iowa Students Struggle Despite AEA Support

An analysis of student performance on the Iowa Statewide Assessment of Student Progress (ISASP) and the National Assessment of Educational Progress (NAEP) shows that students with disabilities in Iowa are performing below the national average. Iowan students with disabilities scored on average over 40 percentage points below the total student population in both English language arts and math on ISASP assessments.¹⁶ **In the most recent administration of NAEP in 2022, students with disabilities in Iowa scored below the national average, despite the state investing several thousand dollars more on a per pupil basis for special education students for that year in comparison to the national special education spending average.**

¹¹ Iowa Code §273.1.

¹² Iowa Code §273.5.

¹³ US Department of Education (published on June 21, 2023), 2023 SPP/APR and State Determination Letters, Part C-Iowa. Available at: <https://sites.ed.gov/idea/idea-files/2023-spp-apr-and-state-determination-letters-part-c-iowa/>.

¹⁴ US Department of Education (published on June 23, 2023), 2023 SPP/APR and State Determination Letters, Part B-Iowa. Available at: <https://sites.ed.gov/idea/idea-files/2023-spp-apr-and-state-determination-letters-part-b-iowa/>.

¹⁵ Guidehouse is a leading global provider of consulting services to the public sector and commercial markets, with broad capabilities in management, technology, and risk consulting.

¹⁶ Iowa Department of Education Iowa Statewide Assessment of Student Progress Spring 2023 Data.

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Table 1: 2022 Students with Disabilities NAEP Scores and Special Education Student Spending

	Average Per Pupil Special Education Spending	Reading		Math	
		4 th Grade	8 th Grade	4 th Grade	8 th Grade
Iowa	\$14,387	175 / 500 41 st nationally	230 / 500 16 th nationally	210 / 500 32 nd nationally	245 / 500 23 rd nationally
National Average	\$9,056	182 / 500	228 / 500	211 / 500	243 / 500
Indicator States	\$8,294	189 / 500	231 / 500	220 / 500	246 / 500

Additionally, NAEP scores show that academic proficiency scores of Iowa's students with disabilities have declined since the early 2000s:

Reading:

- 4th grade reading scores have **decreased** at a rate of **0.43 points** per testing cycle.
- 8th grade reading scores have **decreased** at a rate of **0.31 points** per testing cycle.

Math:

- 4th grade math scores have **decreased** at a rate of **1.19 points** per testing cycle.
- 8th grade math scores have **decreased** at a rate of **0.18 points** per testing cycle.¹⁷

AEAs Lack Institutional Accountability at the State and Local Levels

Due to current funding and governance structures, school districts and the Iowa Department of Education do not have adequate tools and mechanisms to provide oversight and governance to AEAs – particularly in the areas of AEA's budget and personnel.¹⁸

School districts are required under state law to pay AEAs annually from their state aid, with the Iowa Department of Management deducting the amount calculated for AEA services from school districts' state aid and paying it directly to AEAs (also known as a "flow-through" financing model).¹⁹ **Despite school districts funding the operation of AEAs, school district staff members – including school superintendents – are prohibited from sitting on AEA boards of directors and lack formal oversight and accountability mechanisms over AEAs.**²⁰ As a result, if an AEA is not providing the level of quality or services that students with disabilities require, school districts must find support elsewhere to ensure students with disabilities receive a Free Appropriate Public Education (FAPE).^{21,22} Outside service providers may come at an extra cost to school districts, which creates an additional hurdle to addressing the needs of students and causes financial inefficiencies for schools and taxpayers.

¹⁷ Years analyzed include 2003, 2005, 2007, 2009, 2011, 2013, 2015, 2017, 2019, and 2022. Iowa's 8th grade data was not available for 2002 reading scores and 2000 math scores.

¹⁸ Iowa Code Chapter 273; 281 Iowa Administrative Code Chapter 72.

¹⁹ Iowa Code §§257.35(1) and 273.9(1).

²⁰ Iowa Code §273.8.

²¹ 20 United States Code §1401(9).

²² 20 United States Code §1412.

Recommended Improvements

Based on the research and analysis of educational service agency models and special education systems of states that have better academic performance results for students with disabilities, this report recommends that Iowa:

- Local Control: Allow School Districts to Opt-In to the AEA System and to Choose the Best Way to Support Students with Disabilities.** Currently, even if a school district has the capacity and ability to provide special education support services in-house or through other local resources, they are still required to coordinate with AEAs to serve students with disabilities. School districts should be able to decide how they will receive special education support services and have control to direct their state and local funding to best meet the unique needs of their students and community. By giving school districts the authority to opt-in to the AEA system, school districts will be able to spend their funding in what they determine is the most cost-effective manner, which will particularly benefit districts with limited financial resources.
- Services: Concentrate AEA Service Offerings to Focus on Students with Disabilities.** AEAs currently provide services ranging from printing and van delivery to identifying and evaluating students with disabilities. These varied service offerings can lead to unclear priorities and deter AEA focus from serving students with disabilities.
- Funding: Restructure AEA Funding Process to Reflect School District Choice to Opt-In to AEA System.** Iowa state law requires that a portion of school districts' funding "flows-through" to pay AEAs automatically before funding is disbursed to school districts.²³ As the recommendations above include allowing school districts to opt-in to use AEAs, the system for funding AEAs should be amended.
- Performance: Increase State and Local Oversight and Accountability of AEAs.** In key states that outperform Iowa in academic outcomes for students with disabilities, the state's chief education official has oversight and visibility into key personnel decisions of their state's educational service agencies, whereas the Iowa Department of Education lacks some of these key oversight functions. Additionally, Iowa school district personnel are currently prohibited from serving on AEA boards of directors who are charged with overseeing the operations of AEAs. Allowing for additional state and local level governance and oversight mechanisms will help ensure that AEAs' programs and services are meeting the needs of school districts.
- Empower: Grow Iowa Department of Education Funding, Capabilities, and Infrastructure to Provide Greater Levels of Special Education and AEA Oversight.** By concentrating AEA service offerings to focus on students with disabilities, mandatory funding that AEAs currently receive for other services that are not special education-related should no longer be paid to AEAs. Any savings achieved by shifting these services to other entities should be redirected to school districts and the Iowa Department of Education to support special education services and oversight.

²³ Iowa Code §§257.35(1) and 273.9(1).

- **Transparency: Develop Clear Special Education Roles and Responsibilities for School Districts, AEAs, and the Iowa Department of Education.** As part of giving school districts greater control over the provision of special education to their students, the Iowa Department of Education should clearly delineate the roles and responsibilities of all the major entities involved in Iowa's education system to ensure students with disabilities receive services with fidelity through any structural transitions.

Given trends observed with Iowa's NAEP and ISASP scores, it is imperative for the future of Iowa's students with disabilities, families, teachers, and administrators that the state move quickly to improve the educational services it provides to this vulnerable student population. By making the changes recommended in this report, Iowa will be taking crucial steps towards this goal.

II. Research Approach

Indicator States

After comparing Iowa to the United States' 50 states collectively, several states were chosen for an in-depth review and comparison of special education and educational service agency models based on the following characteristics:

- Relative national geographic proximity to Iowa to reflect regional challenges in education;
- Similar numbers of school districts in each state to reflect broader governance choices and systems of local control between the states;
- In-state geographic locale similarities, especially rural district prevalence, as geographic locale directly affects the provision of educational and professional support services throughout states (e.g., student transportation provision, proximity to employment hubs for staffing);
- Lower levels of special education spending than Iowa, which, along with similar or better education of students with disabilities, can indicate more efficient and effective use of available funds; and
- Higher NAEP scores for students with disabilities than Iowa to identify states for further analysis of how Iowa may improve academic achievement of students with disabilities.

Selecting states with similar characteristics in relation to Iowa allows for meaningful comparisons that ultimately informed the report's recommendations. Additional details about the 50 states' special education systems and educational service agencies are available in Appendix C. Table 2 presents an overview of the educational service agencies and characteristics of Iowa and the six states (Florida, Georgia, Nebraska, South Dakota, Tennessee, and Texas), referred to as "indicator states," identified for more in-depth analysis in this report.

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Table 2: Iowa and Indicator State Characteristics

State	Educational Service Agency Overview	Enrolled Students ²⁴	School Districts ²⁵	2019 Average NAEP Score	2022 Average NAEP Score	% of Districts that are Rural ²⁶
Iowa	9 AEA's; support special education	517,324	327	210	215	70%
Florida	3 Educational Consortia and 18 Florida Diagnostic and Learning Resources System local centers; support special education	2,858,461	76	233	231	30%
Georgia	16 Regional Education Service Agencies; no role in special education	1,769,657	216	220	221	50%
Nebraska	17 Educational Service Units; support special education	330,018	251	220	217	73%
South Dakota	14 cooperatives; support special education	139,949	150	219	219	81%
Tennessee	Unknown number of cooperatives; support special education	1,014,744	147	219	218	50%

²⁴ National Center for Education Statistics (accessed in September 2023), Elementary/Secondary Information System State Enrollment Data. Available at: <https://nces.ed.gov/ipeds/data/elsi/tableGenerator.aspx?savedTableID=646278>.

²⁵ Ibid.

²⁶ National Center for Education Statistics (NCES) Education Demographic and Geographic Estimates (EDGE) (accessed on October 13, 2023), SY 2019-2020 Public School District Agency File. Available at: <https://nces.ed.gov/ipeds/data/edge/Geographic/SchoolLocations>.

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State	Educational Service Agency Overview	Enrolled Students ²⁴	School Districts ²⁵	2019 Average NAEP Score	2022 Average NAEP Score	% of Districts that are Rural ²⁶
Iowa	9 AEAs; support special education	517,324	327	210	215	70%
Texas	20 Regional Education Service Centers; support special education	5,495,398	1,205	223	222	53%

Regional Price Parities by State

To standardize state-level educational expenditures for comparison across the 50 states, total expenditure levels were adjusted using the US Bureau of Economic Analysis’ Regional Price Parities by State (RPP) for the applicable year of data (in this case, for FY20).²⁷ The RPP adjustment helps account for regional and state pricing differences in the provision of goods and services across the country (in this case, the cost of the provision of education). State education expenditures were multiplied by the RPP adjustment in proportion to the national average, with some states having higher than average pricing parity and others having lower than average pricing parity. For reference, in FY20, Iowa had a state RPP of 90.268 compared to the United States’ baseline RPP of 100 (the 44th lowest in the country), so Iowa’s state education expenditures for FY20 were multiplied by 90.268 over 100 to generate expenditures for comparison to other states.²⁸

Special Education Spending Analysis

The National Center for Education Statistics (NCES) first surveyed school districts across the nation for special education financial expenditure data in FY20 (2019-2020 school year). To compare statewide expenditures, school district-level data for all education spending was summed and averaged for each of the 50 states to the per-pupil level using NCES-derived total enrollment pupil counts.²⁹ Special education expenditures were averaged for each of the 50 states at the per-pupil level using NCES “Children with Disabilities/IDEA Student Counts” to demonstrate total special education funds expended on the special education population.³⁰ To

²⁷ US Bureau of Economic Analysis (published December 15, 2022), SARPP Regional price parities by state. Available at: https://apps.bea.gov/itable/index.html?appid=70&stepnum=40&Major_Area=3&State=0&Area=XX&TableId=101&Statistic=1&Year=2020&YearBegin=-1&Year_End=-1&Unit_Of_Measure=Levels&Rank=1&Drill=1&nRange=5&Appld=70.

²⁸ Ibid.

²⁹ US Department of Education, National Center for Education Statistics (accessed in September 2023), Common Core of Data (CCD), Local Education Agency (School District) Universe Survey 2019-20 v.1a, Public Elementary/Secondary School Universe. Available at: <https://nces.ed.gov/ccd/elsi/>.

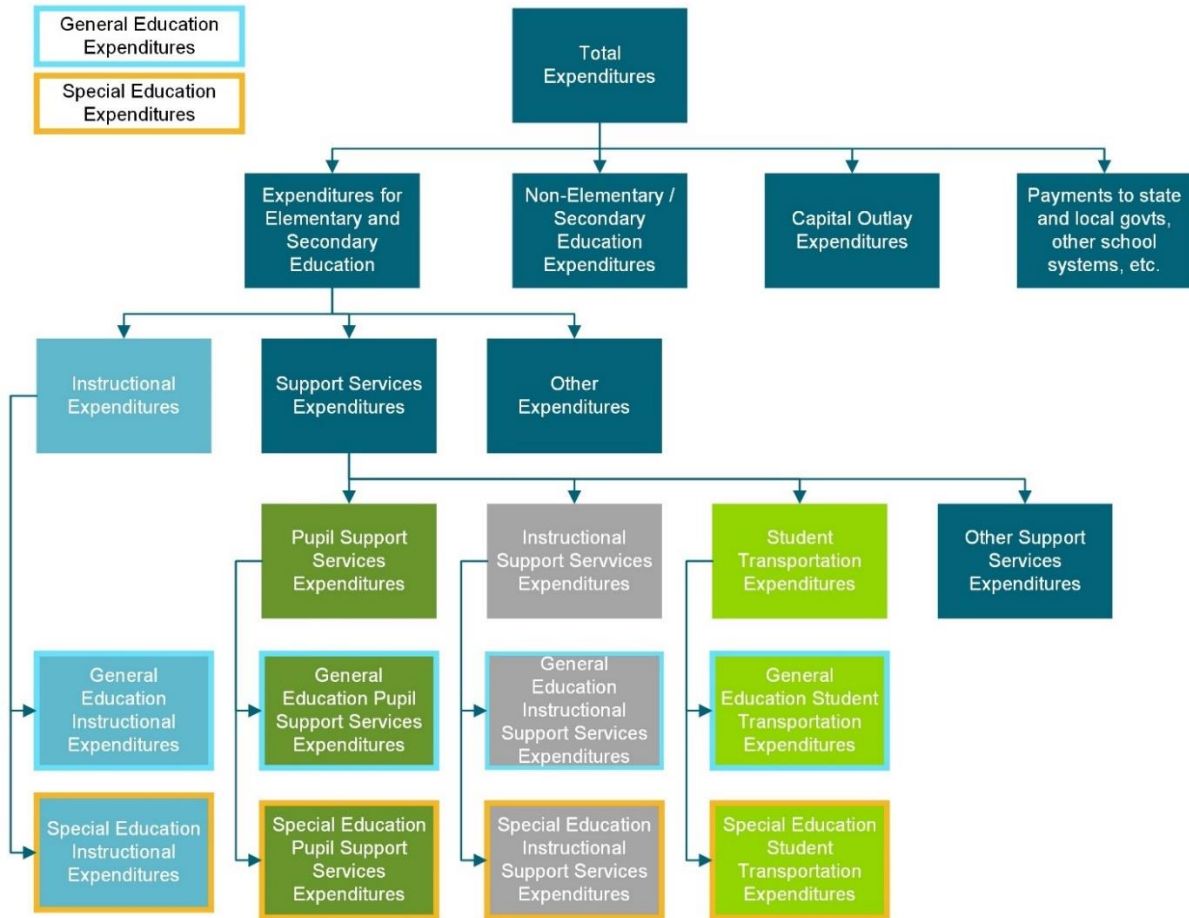
³⁰ US Department of Education, National Center for Education Statistics (accessed in September 2023). Common Core of Data (CCD). Local Education Agency (School District) Universe Survey 2019-20 v.1a, Children with Disabilities Data. Available at: https://nces.ed.gov/ccd/Data/zip/ccd_lea_2_89_1920_1_1a_082120.zip.

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better compare financial data, per-pupil expenditures were adjusted for regional buying power using the Regional Price Parity, as further explained in the previous section.³¹

Some expenditures, like general instruction and food services, apply to all pupils. An explanation of per-pupil expenditures is provided in Figure 1.

Figure 1: NCES FY20 Survey Total Education Expenditures Categorization Summary

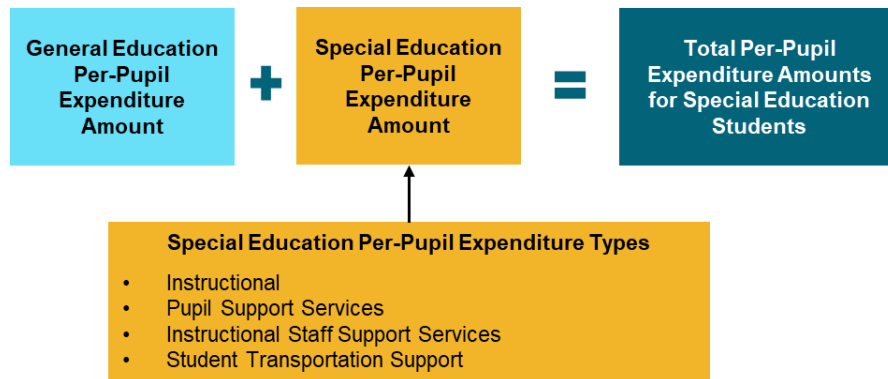


The total special education student per-pupil expenditure amount consists of the following components, as depicted in Figure 2:

³¹ US Bureau of Economic Analysis (published December 15, 2022), SARPP Regional price parities by state. Available at: https://apps.bea.gov/itable/index.html?appid=70&stepnum=40&Major_Area=3&State=0&Area=XX&TableId=101&Statistic=1&Year=2020&YearBegin=-1&Year_End=-1&Unit_Of_Measure=Levels&Rank=1&Drill=1&nRange=5&Appld=70.

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Figure 2: NCES FY20 Survey Total Special Education Student Per-Pupil Expenditure Categorization Summary³²



³² Ibid.

III. Current State and Comparative Analyses of Special Education in Iowa

This analysis of Iowa's special education system is categorized into the following sections that describe the system's current state and examine key aspects of academics, finance, operations, and governance:

- Academic Performance
- Special Education Spending Compared to Academic Performance
- About Educational Service Agency Systems
- Iowa's Area Education Agencies
- Operational Performance
- Governance and Oversight

Evidence from state and national educational assessments, school district and AEA financial data, federal compliance reports, and institutional research show that:

- Despite spending more to educate students with disabilities than the national average and indicator states, Iowa's students with disabilities have lower academic proficiency rates.
- The Iowa Department of Education and school district employees lack critical oversight over AEA operations.
- Administrative costs accounted for roughly 19%, or \$81,844,932, of total AEA expenditures in FY22.³³
- School districts have no autonomy over the portion of their state aid funding automatically diverted to AEAs.

³³ Additional detail on the methodology of this analysis, including details on the categorization of expenditures is available in Appendix F.3.

Academic Performance

AEAs assist school districts with and directly provide special education support services and instruction for students with disabilities, like identifying and evaluating students with disabilities and developing Individualized Education Programs to support the student’s academic growth and achievement. As further described below, Iowa students with disabilities have repeatedly struggled to reach goals for statewide and national testing for reading and math.

Iowa Statewide Assessment of Student Progress Comparison

Iowa students take the Iowa Statewide Assessment of Student Progress (ISASP) annually for English language arts and math to measure student proficiency on Iowa Academic Standards in 3rd grade through 11th grade.³⁴ AEAs provide ISASP testing accommodations for students with disabilities including designated features like color contrasts and large print test booklets, and stronger accommodations, like sign language interpreters and braille writers.³⁵ Each grade’s test has a scale score threshold to measure proficiency. As displayed in Figures 3 and 4, Iowa’s students with disabilities are achieving proficiency at levels far below the total student population.

Figure 3: 2023 Iowa ISASP English Language Arts (ELA) Proficiency Rates

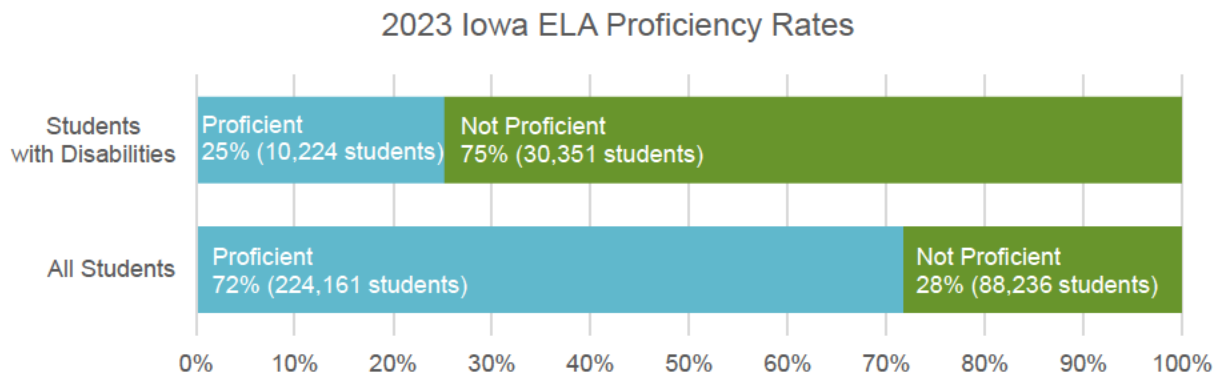
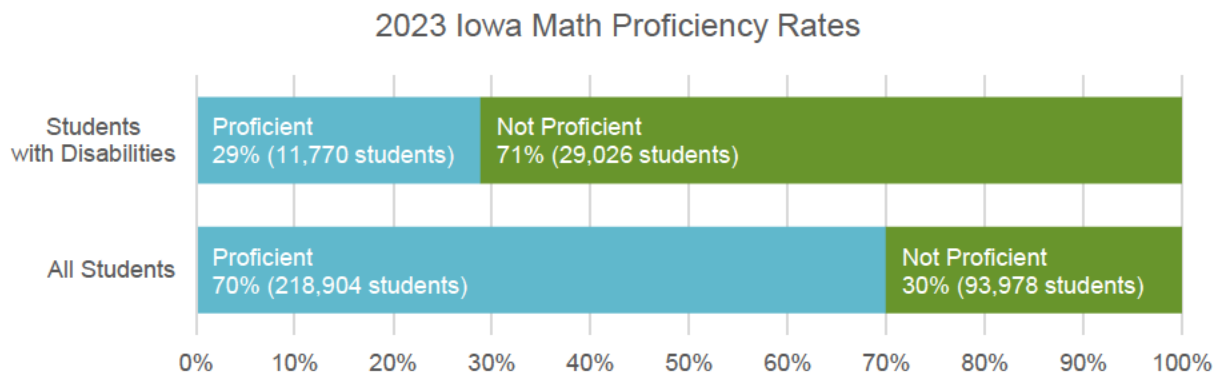


Figure 4: 2023 Iowa ISASP Math Proficiency Rates



³⁴ Iowa Statewide Assessment of Student Progress (accessed on September 27, 2023), Overview of Assessment. Available at: https://iowa.pearsonaccess.com/resources/bulletins/ISASP_OverviewOfAssessment.pdf

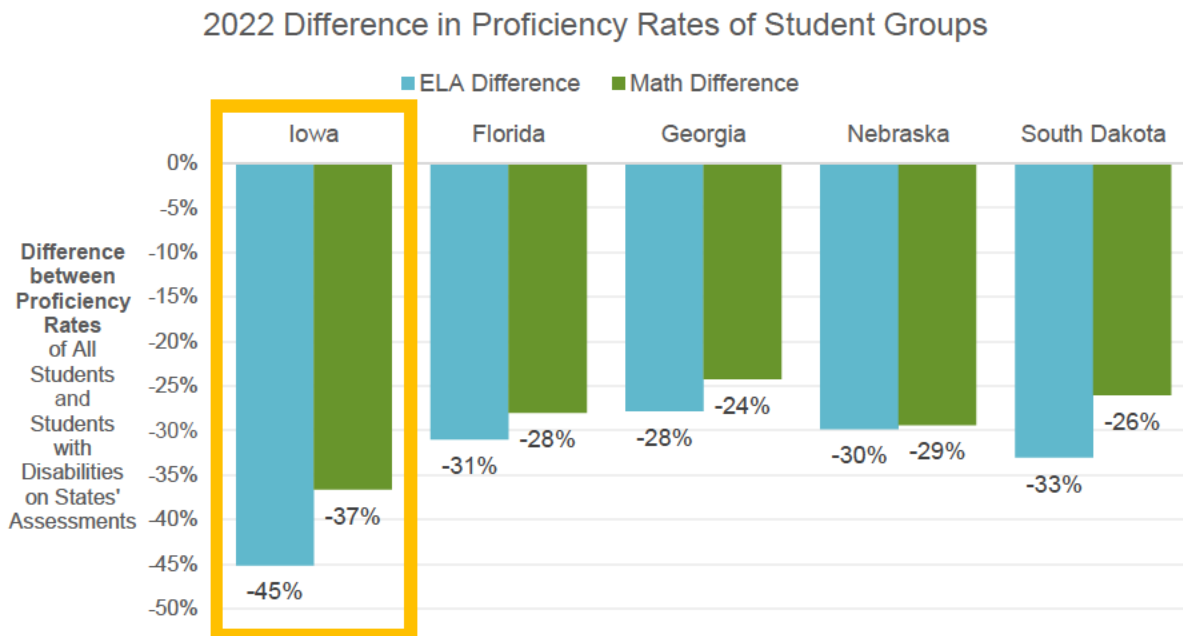
³⁵ Iowa Statewide Assessment of Student Progress (accessed on October 12, 2023), Accessibility and Accommodations Manual. Available at: https://iowa.pearsonaccess.com/resources/manuals/IA1141784_ISASP_AccomsMan_23_WEB.pdf

Special Education in the State of Iowa

In the spring of 2023, Iowa’s students with disabilities had an English language arts proficiency rate at 47 percentage points below that of the total student population and 41 percentage points below in math. Few Iowa school districts have English language arts or math proficiency rates higher than 50% for students with disabilities.³⁶

Other states also conduct annual statewide standardized testing. Many states publicly report proficiency rates for student demographic groups based on assessment outcomes. As seen in Figure 5, a comparison of four indicator states’ most recent publicly available data show a gap of 24 - 33% between general education and students with disabilities’ assessment scores, while Iowa has a gap of 45% for English language arts and 37% for math assessments in the same year.^{37, 38, 39, 40, 41, 42} For Iowa to achieve similar proficiency rates, 3,000 to 15,000 additional Iowa students with disabilities would need to reach proficiency.⁴³

Figure 5: Differences in States’ 2022 English Language Arts (ELA) and Math Assessment Proficiency Rates Between All Students and Students with Disabilities for Iowa and Indicator States⁴⁴



³⁶ Iowa Department of Education Iowa Statewide Assessment of Student Progress Spring 2023 Data.

³⁷ ISASP 2019-2023 State Level Results (accessed in October 2023), English Language Arts Performance by Demographic Groups. Available at: <https://iowa.pearsonaccess.com/resources/reporting-resources/ISASP%202019-2023%20ELA%20State%20Level%20Results%20by%20Demographics.pdf>

³⁸ ISASP 2019-2023 State Level Results (accessed in October 2023), Mathematics Performance by Demographic Groups. Available at: <https://iowa.pearsonaccess.com/resources/reporting-resources/ISASP%202019-2023%20Math%20State%20Level%20Results%20by%20Demographics.pdf>

³⁹ Florida Standards Assessments (accessed in October 2023), English Language Arts and Mathematics. Available at: <https://www.fldoe.org/core/fileparse.php/5668/urlt/80FSARResults22.pdf>

⁴⁰ Georgia Department of Education (accessed in October 2023), Georgia Milestones Assessment System. Available at: <https://georgiainsights.gadoe.org/Dashboards/Pages/Georgia-Milestones.aspx>

⁴¹ Nebraska Department of Education (accessed in October 2023), NSCAS Technical Reports. Available at: <https://www.education.ne.gov/assessment/technical-reports/#1578435682074-eb99e668-369f>, click on "2022 NSCAS Growth Technical Report."

⁴² South Dakota Department of Education (accessed in October 2023), South Dakota Report Card. Available at: <https://sdschools.sd.gov/#/home>, click on "Years," then click on "2021-2022," then click on "State," then click on "Student Performance."

⁴³ Iowa Department of Education, (accessed in October 2023), Education Statistics – PK-12. Available at: <https://educateiowa.gov/data-reporting/education-statistics-pk-12>

⁴⁴ The report indicator states of Texas and Tennessee were not included in this analysis due to a lack of publicly available data separating the statewide assessment scores of total student populations and students with disabilities.

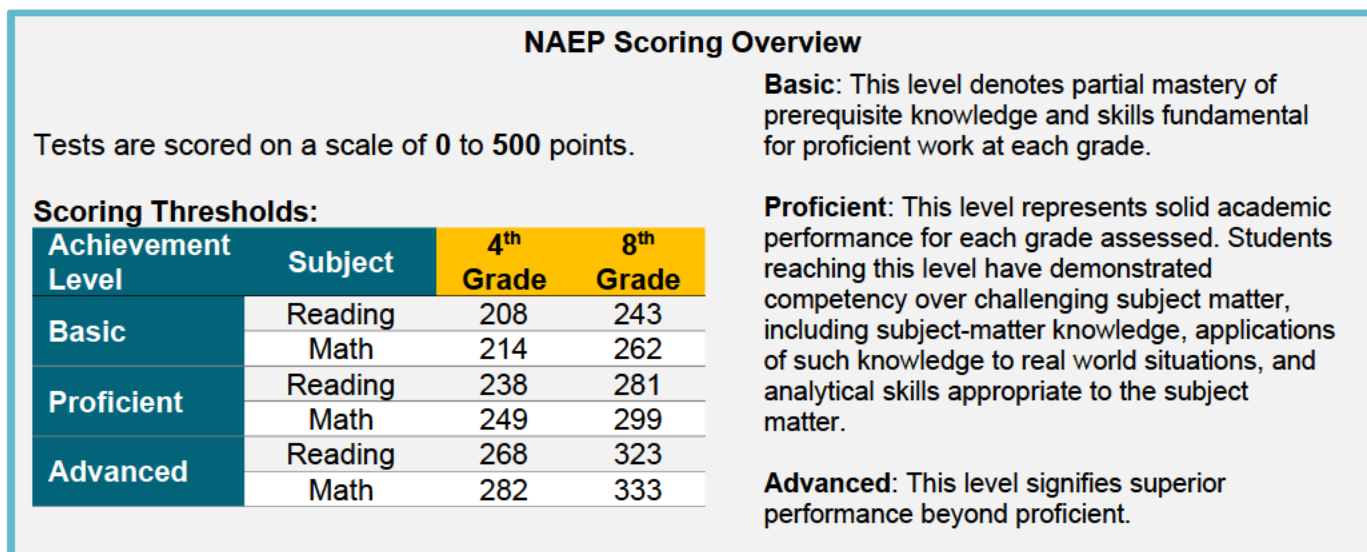
National Assessment of Educational Progress Analysis

Overview

The National Assessment of Educational Progress (NAEP) is a national assessment that measures proficiency in a variety of topics, including reading and math, which serve as the foundation for all tested subjects. The NAEP assessment is conducted in a statistically significant randomized sample of schools and students across the nation, representing the breadth of districts throughout each state. NAEP assessments are conducted every two years with students in 4th, 8th, and 12th grades participating in the testing process.^{45, 46} Similar to AEA's work for ISASP tests, AEA's assist with the accommodations of students with disabilities for NAEP testing, which include accommodations such as having a familiar person present in testing room, special equipment, and scribing.⁴⁷

Results from NAEP assessments are reported at the national and state levels and include aggregated student-level results based on demographic groupings (e.g., students with disabilities, gender, race/ethnicity). NAEP scores range from 0 to 500 points and are reported by the percentage of students reaching "Basic," "Proficient," and "Advanced" levels of proficiency on tested subjects.^{48, 49} See Figure 6 for more details on NAEP proficiency levels.

Figure 6: Overview of NAEP Achievement Levels and Scoring Thresholds^{50, 51}



⁴⁵ NAEP tests were delayed one year due to the COVID-19 pandemic and resumed in 2022.

⁴⁶ US Department of Education, National Center for Education Statistics (accessed on October 2, 2023), An Overview of NAEP. Available at: https://nces.ed.gov/nationsreportcard/subject/about/pdf/naep_overview_brochure_2021.pdf.

⁴⁷ National Assessment of Educational Progress (accessed on October 12, 2023), Digitally Based Assessments UDE and Accommodation Descriptions. Available at: https://nces.ed.gov/nationsreportcard/about/accom_ude_descriptions.aspx.

⁴⁸ National Assessment of Educational Progress, National Assessment Governing Board (published in November 2006), NAEP Achievement Levels. Available at: <https://www.nagb.gov/content/dam/nagb/en/documents/naep/ward-naep-achievement-levels.pdf>.

⁴⁹ The Nation's Report Card (accessed on September 26, 2023), Data Tools Item Maps. Available at: <https://www.nationsreportcard.gov/itemmaps/?subj=reading&grade=4>, click on "Select Subject" drop down menu, then click on desired subject, then repeat for "Select Grade" and "Select Year."

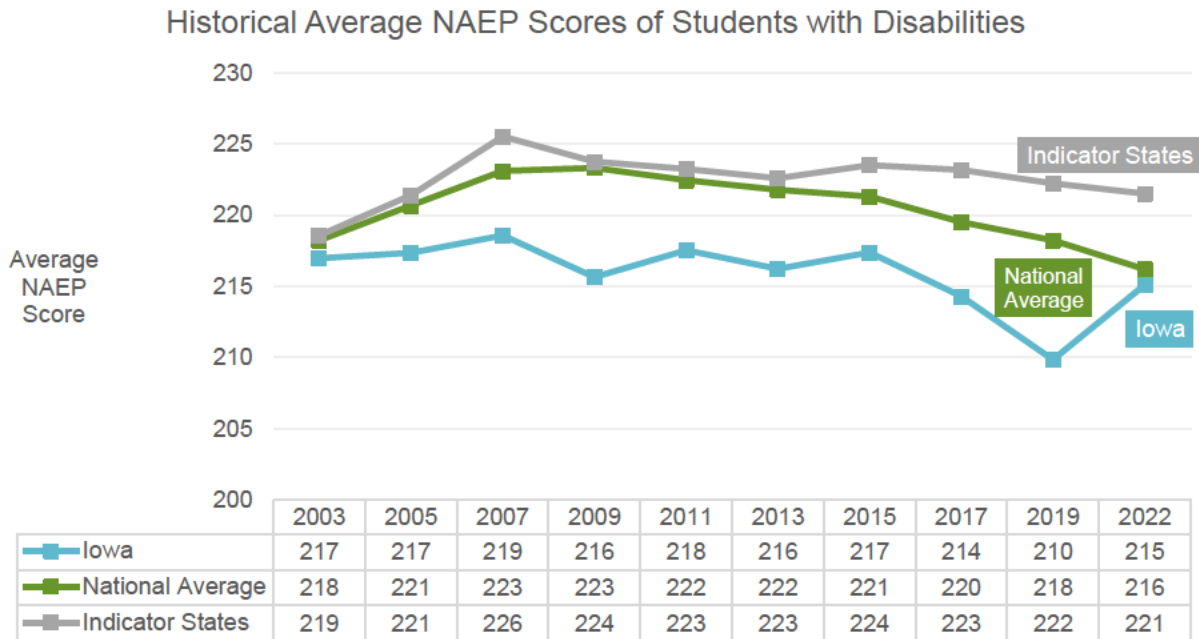
⁵⁰ National Assessment of Educational Progress (accessed on October 12, 2023), The NAEP Reading Achievement Levels by Grade. Available at https://nces.ed.gov/nationsreportcard/reading/achieve.aspx#2009_grade4.

⁵¹ National Assessment of Educational Progress (accessed on October 12, 2023), The NAEP Reading Achievement Levels by Grade. Available at <https://nces.ed.gov/nationsreportcard/mathematics/achieve.aspx>.

Historical Performance

As seen in Figure 7 below, Iowa has scored below the NAEP 4th and 8th grade reading and math students with disabilities average for indicator states and nationally in each NAEP test administration since 2003.⁵²

Figure 7: Comparison of Historical NAEP Scores of Students with Disabilities Between Iowa, Indicator States, and the National Average⁵³



Significantly, in the last three testing cycles, Iowa has had the ninth-largest gap in NAEP scores between Iowa’s score and the national average for students with disabilities in 4th grade reading (an 8.2-point gap) and the tenth-largest gap for 4th grade math assessment scores (a 5.5-point gap) out of all 50 states. Though scores improved slightly in 2022, Iowa’s students with disabilities still perform below indicator states.

Across the 2017, 2019, and 2022 testing cycles, Iowa’s students with disabilities have ranked 30th or worse for nine of the last 12 NAEP assessments.

⁵² For purposes of this report, “national average” refers to the average of 50 states’ average NAEP scores and does not include scores from the District of Columbia, Department of Defense Education Activity, and Puerto Rico.

⁵³ Indicator states include Florida, Georgia, Nebraska, South Dakota, Tennessee, and Texas.

Special Education in the State of Iowa

Figure 8: Differences in Aggregated 2017, 2019, and 2022 NAEP Reading and Math Scores Between All Students and Students with Disabilities for Iowa, the National Average, and Indicator States

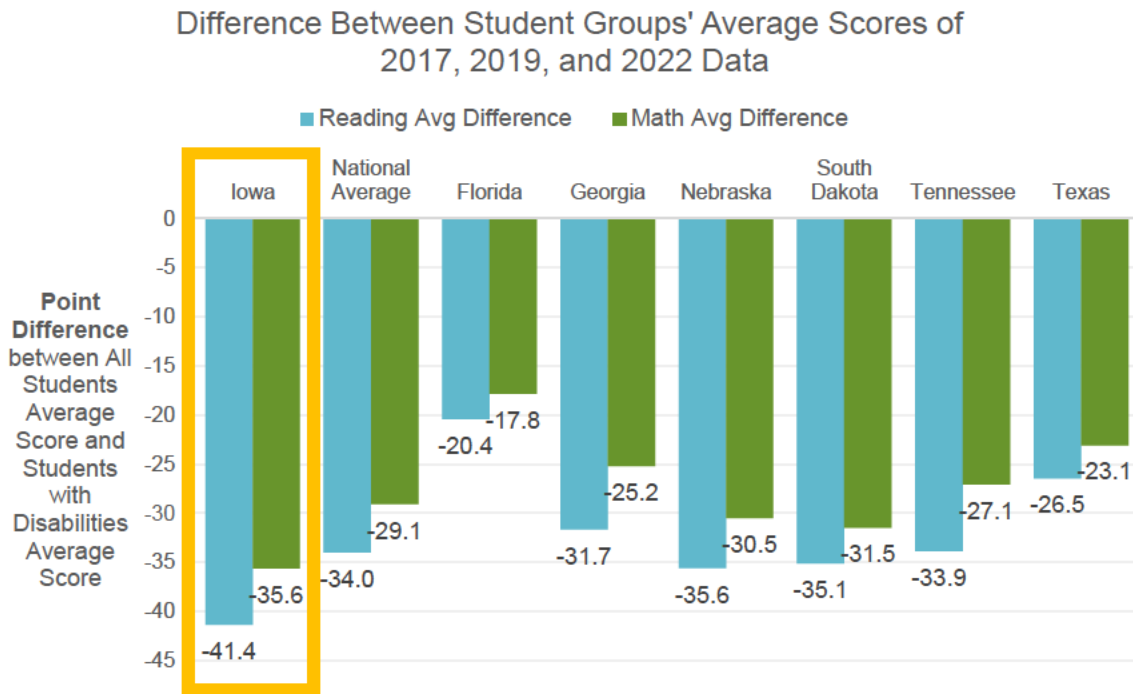
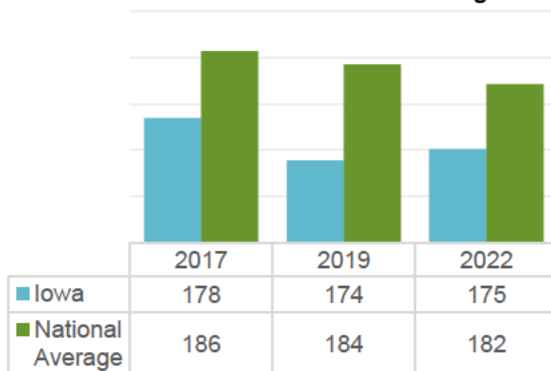


Figure 8 above shows average NAEP scores disaggregated into reading and math scores, averaged from 2017, 2019, and 2022, and displays the point difference between all students and students with disabilities' scores. In relation to indicator states and the national average, Iowa's students with disabilities have larger NAEP proficiency gaps compared to the total student population for each assessment with the largest and most significant gap in reading proficiency.

Figure 9: Comparison of 2017, 2019, and 2022 4th Grade Students with Disabilities' NAEP Reading Scores Between Iowa and the National Average



As shown in Figure 9, Iowa's 4th grade NAEP reading scores for students with disabilities in 2017, 2019, and 2022 fall far below the national average of each respective year. 4th grade is significant for students as it marks the transition from "learning to read" to "reading to learn." Gaps in overall academic ability between confident readers and their struggling counterparts accelerate after 4th grade, as consequent schooling builds upon foundational skills expected to have been obtained in elementary grade levels.⁵⁴

Early childhood literacy is paramount to a child's development in many critical ways: children who are good readers by the 4th grade tend to read considerably more in school and out of school than poor readers, achieve a much higher level of decoding skill, become better writers,

⁵⁴ Reading Partners. (published on November 9, 2015). Why Reading by Fourth Grade Matters for Student Success. Available at: <https://readingpartners.org/blog/why-reading-by-fourth-grade-matters-for-student-success/>

and grow more in both reading and writing.⁵⁵ Aside from its effects on pure reading and writing skills, reading level is related to health and safety. The US Department of Health and Human Services identified a specific objective in their Healthy People 2030 goals to “increase the proportion of 4th-graders with reading skills at or above the proficient level” (NAEP definition of proficiency), stating that children who read poorly are more likely to struggle in school and, notably, engage in risky behaviors in their adolescent years.⁵⁶ These students often experience decreases in self-confidence, exacerbating the challenges they face in growing academically.⁵⁷

See Appendix E.2 for more information concerning NAEP scores.

⁵⁵ Juel, C. (published in 1988), Learning to read and write: A longitudinal study of 54 children from first through fourth grades. *Journal of Educational Psychology*, 80(4), 437–447. Available at: <https://doi.org/10.1037/0022-0663.80.4.437>.

⁵⁶ US Department of Health and Human Services (published in 2023), Healthy People 2030 Objective AH-05. Available at: <https://health.gov/healthypeople/objectives-and-data/browse-objectives/schools/increase-proportion-4th-graders-reading-skills-or-above-proficient-level-ah-05>.

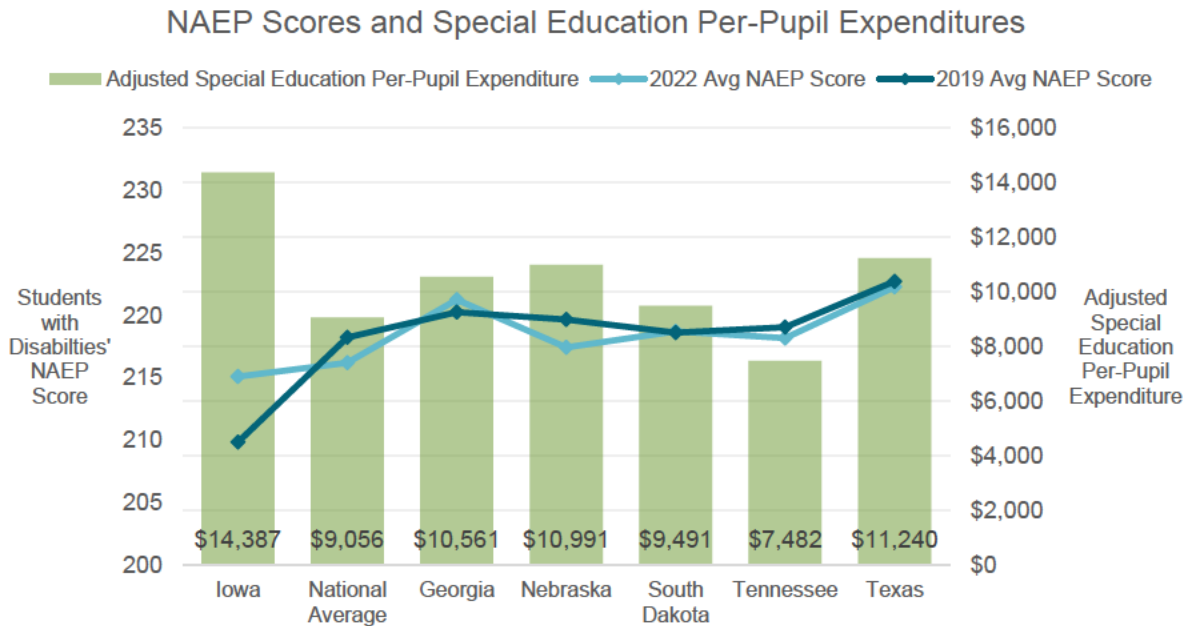
⁵⁷ Reading Partners, (published on November 9, 2015), Why Reading by Fourth Grade Matters for Student Success. Available at: <https://readingpartners.org/blog/why-reading-by-fourth-grade-matters-for-student-success/>.

Special Education Spending Compared to Academic Performance

Iowa has almost 70,000 students with disabilities enrolled in schools, equating to 13.5% of all students in the 2019-2020 school year.⁵⁸ Iowa’s AEs and school districts together spent over \$1.11 billion on special education during the 2019-2020 school year, with AEs spending \$210 million and school district districts spending \$901 million.⁵⁹ The \$1.11 billion spent on special education services in Iowa represents 14% of the state’s total education expenditures.

Significantly, Iowa spends more than the national average and peer states on special education per-pupil expenditures but is seeing little in return in the form of improved academic outcomes. As displayed in Figure 10, despite Iowa spending \$5,331 more than the national average of per-pupil expenditures for students with disabilities, Iowa students with disabilities had poorer academic results on nationwide assessments than the national average and indicator states.

Figure 10: Comparison of 2019, 2022 NAEP Scores and Special Education Per-Pupil Expenditures for Iowa, Indicator States, and the National Average



Florida reported \$0 in special education expenditures to NCES in FY20.

⁵⁸ US Department of Education, National Center for Education Statistics (accessed in September 2023), Common Core of Data (CCD), Local Education Agency (School District) Universe Survey 2019-20 v.1a, Children with Disabilities Data. Available at: https://nces.ed.gov/ipeds/data/ipeds_datacenter/ipeds_datacenter.asp?table=100&year=2019-20&levell=1&level2=89&level3=1920&level4=1&level5=082120.

⁵⁹ National Center for Education Statistics, (accessed in September 2023), CCD Data Files 2019-2020, District Finance Survey (F-33). Available at: https://nces.ed.gov/ipeds/data/ipeds_datacenter/ipeds_datacenter.asp?table=100&year=2019-20&levell=1&level2=89&level3=1920&level4=1&level5=082120.

About Educational Service Agency Systems

For purposes of this report, an educational service agency is a regional entity that provides support services to local education agencies (school districts) and includes entities like cooperatives and intermediate school districts.⁶⁰ This definition also includes both public entities (those authorized in state law or established by agreements between school districts) and private entities.

Research identified 46 states with some type of educational service agency system. Of the 46 states with educational service agencies, 28 states were identified with at least one educational service agency involved in special education support service or instruction – which could range from providing full scale special education services akin to AEAs or creating cooperative purchasing agreements for school districts to voluntarily use to find qualified vendors for education support services (e.g., physical therapy, occupational therapy). For this report's purposes, professional development related to special education is not considered a special education support service.

Table 3 presents an overview of the educational service agencies (as well as the number of enrolled students and number of school districts) for Iowa and indicator states. The table with this information for all 50 states is documented in Table 15 in Appendix C.

Table 3: Iowa and Indicator State Educational Service Agency (ESA) Characteristics

State	Number of Enrolled Students ⁶¹	Number of School Districts ⁶²	Number of ESAs Identified	Name of State ESAs	At Least One ESA Involved in Special Education Support Services
Iowa	517,324	327	9 ⁶³	Area Education Agencies	Yes
Florida	2,858,461	76	3 ⁶⁴ / 18 ⁶⁵	Educational Consortia; Florida Diagnostic and Learning Resources System local centers	Yes

⁶⁰ This definition closely tracks the federal definition of educational service agencies that is part of the Individuals with Disabilities Education Act. That provision defines "educational service agency" as a "regional public multiservice agency . . . authorized by State law to develop, manage, and provide services or programs to local education agencies; and . . . recognized as an administrative agency for purposes of this provision of special education and related services provided within public elementary schools and secondary schools of the State" (20 United States Code 1401(5)). This definition also includes "any other public institution or agency having administrative control and direction over a public elementary school or secondary school."

⁶¹ National Center for Education Statistics (accessed in September 2023), Elementary/Secondary Information System State Enrollment Data. Available at: <https://nces.ed.gov/ipeds/data/elsi/tableGenerator.aspx?savedTableID=646278>.

⁶² Ibid.

⁶³ Iowa Code §273.2 authorizes the establishment of area education agencies, which are listed here: Iowa's Area Education Agencies (accessed on September 28, 2023), About. Available at: <https://iowaaea.org/about/>.

⁶⁴ Florida Statutes §1001.451 authorizes the creation of educational consortia. The consortia are described here: Florida's Educational Consortia (published on October 30, 2019), Florida's Educational Consortia. Available at: https://www.paec.org/site/files/Tri%20Consortia%20Brochure%2010-30-19_rev.pdf.

⁶⁵ Florida Diagnostic and Learning Resources System (accessed on October 22, 2023), Find a Center. Available at: <https://www.fdlrs.org/find-a-center>.

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State	Number of Enrolled Students ⁶¹	Number of School Districts ⁶²	Number of ESAs Identified	Name of State ESAs	At Least One ESA Involved in Special Education Support Services
Iowa	517,324	327	9 ⁶³	Area Education Agencies	Yes
Georgia	1,769,657	216	16 ⁶⁶	Regional Education Service Agencies	No
Nebraska	330,018	251	17 ⁶⁷	Educational Service Units	Yes
South Dakota	139,949	150	14 ⁶⁸	Cooperative Educational Service Units	Yes
Tennessee	1,014,744	147	Unknown ⁶⁹	Educational Cooperatives	Yes ⁷⁰
Texas	5,495,398	1,205	20 ⁷¹	Regional Education Service Centers	Yes

⁶⁶ Under the Official Code of Georgia Annotated §20-2-270, the Georgia State Board of Education must establish a statewide network of regional educational service agencies. This website specifies the number of these agencies and the services they provide: Georgia Department of Education (accessed on September 28, 2023), Regional Education Service Agencies. Available at: [https://www.gadoe.org/Pages/Regional-Education-Service-Agencies-\(RESAs\).aspx](https://www.gadoe.org/Pages/Regional-Education-Service-Agencies-(RESAs).aspx).

⁶⁷ Nebraska Revised Statutes §79-1204 describes the role, mission, powers, and duties of educational service units. Further information about these entities is available here: Nebraska Department of Education (published in July 2023), Educational Service Units – School Year 2023-2024. Available at: <https://www.education.ne.gov/wp-content/uploads/2023/07/Educational-Service-Units-23-24.pdf>.

⁶⁸ South Dakota Codified Laws §§13-5-31 through 13-5-33.2 specify that cooperative educational service units are legal entities and establish requirements for these entities. A list of the state's cooperatives is available here: South Dakota Department of Education (accessed on September 29, 2023), South Dakota Educational Directory. Available at: <https://doe.sd.gov/ofm/edudir.aspx>.

⁶⁹ Tennessee Code Annotated §49-2-1302 permits the establishment of the state's educational cooperatives. Additionally, Tennessee Code Annotated §49-10-116 permits LEAs or charter schools to form special education cooperatives. While at least one of these entities exists, our research did not find a definitive list of all educational cooperatives or special education cooperatives in the state. As a result, the number of ESAs for Tennessee is unknown.

⁷⁰ Little Tennessee Valley Educational Cooperative (accessed on October 1, 2023), Home. Available at: <http://www.ltvec.org/>

⁷¹ Texas Education Code §8.001 requires that the Texas Commissioner of Education provide for the establishment and operation of the state's regional education service centers. More information about these entities is available at both of the following websites:

- Texas Education Agency (accessed on September 29, 2023), Education Service Centers. Available at: <https://tea.texas.gov/about-tea/other-services/education-service-centers>.

- Texas Association of School Boards (accessed on September 29, 2023), Education Service Centers. Available at: <https://www.tasb.org/about-tasb/related-sites-and-affiliated-entities/education-service-centers.aspx>.

Iowa's Area Education Agencies

Iowa created its AEA system in 1974 to provide special education and media services for school districts.⁷² AEA's were formed in response to (1) federal special education laws enacted around that time and (2) inconsistent services provided by the state's precursor to AEA's (county school systems and joint county systems).⁷³

AEA's were primarily created to provide special education services and have added additional services over time.⁷⁴ AEA's are required to provide their educational services and programs to students enrolled in both public and nonpublic schools.⁷⁵

Special Education Services

AEA's are deeply involved in the provision of special education instruction and support services to Iowa's students with disabilities, and many of their responsibilities are intended to satisfy requirements of the federal Individuals with Disabilities Education Act (IDEA). The following discussion provides an overview of IDEA followed by an explanation of AEA's' specific duties related to support services and student instruction.

Federal Special Education Requirements

To receive federal special education funding, a state's special education system must comply with the requirements of IDEA.^{76, 77} States may receive funding under three parts of IDEA:

- Part B, Section 611 – funding for the provision of special education for children and adults ages 3 through 21 with disabilities;⁷⁸
- Part B, Section 619 – preschool formula grants for additional services for children ages 3 through 5 with disabilities;⁷⁹ and
- Part C – funding for early intervention services for infants and toddlers ages birth through 2 with disabilities.⁸⁰

IDEA has 13 categories of disabilities that apply to Parts B and C, but having one of those disabilities does not automatically qualify a child for services under IDEA.⁸¹ To qualify, a child

⁷² 1974 Iowa Acts, ch. 1172, §3. Available at: <https://www.legis.iowa.gov/docs/publications/iactc/65.2/CH1172.pdf>.

⁷³ For more information about the creation of AEA's, see both of the following:

- Iowa's Area Education Agencies (accessed on October 4, 2023), About. Available at: <https://iowaaea.org/about/>.

- Legislative Services Agency (accessed on October 4, 2023), Legislative Guide – Area Education Agencies. Available at: <https://www.legis.iowa.gov/docs/publications/LG/12348.pdf>.

⁷⁴ 1974 Iowa Acts, ch. 1172, §3. Available at: <https://www.legis.iowa.gov/docs/publications/iactc/65.2/CH1172.pdf>.

⁷⁵ Iowa Code §273.2(3).

⁷⁶ 20 United States Code Chapter 33.

⁷⁷ United States Department of Education – Individuals with Disabilities Education Act (accessed on October 6, 2023), About IDEA. Available at: <https://sites.ed.gov/idea/about-idea/>.

⁷⁸ 20 United States Code §§1411-1418 describe the requirements and funding for the provision of special education for children and adults ages 3 through 21 with disabilities.

⁷⁹ 20 United States Code §1419 describes the requirements and funding for the preschool formula grants for children ages 3 through 5 with disabilities.

⁸⁰ 20 United States Code Chapter 33, Subchapter III.

⁸¹ The 13 disability categories are autism, deaf-blindness, deafness, emotional disturbance, hearing impairment, intellectual disability, multiple disabilities, orthopedic impairment, other health impairment, specific learning disability, speech or language impairment, traumatic brain injury, and visual impairment (including blindness). 20 United States Code §1401(3)(A); 34 Code of Federal Regulations §300.8.

must have a disability and require special education instruction and/or support services to make progress in school due to that disability.⁸²

The majority of IDEA funding is provided under Part B, Section 611. In general, this section requires that schools provide a free appropriate public education (FAPE) in the least restrictive environment to students with disabilities requiring special education.^{83, 84} A written document called an Individualized Education Program must be in effect at the beginning of each school year for each special education student that qualifies for services under IDEA. The IEP details (1) the student's educational needs and (2) the specific plan for providing FAPE to that student.⁸⁵

AEA Special Education Responsibilities

AEAs are required to have a special education division that is responsible for implementing “state regulations and guidance relating to special education programs and services.”⁸⁶ While school districts are responsible for providing special education instruction for students “if practicable,” they must “cooperate” with AEAs “to provide an appropriate special education instructional program for each child who requires special education instruction.”⁸⁷ School districts may also contract with AEAs for special education instruction services.⁸⁸

Additionally, AEAs provide a variety of support services for special education for both public and nonpublic school students.⁸⁹ Often these services play a significant role in how special education instruction is provided, particularly due to the requirement that AEAs ensure special education students receive FAPE. Figure 11 outlines areas related to special education for which AEAs have responsibilities and duties.⁹⁰

⁸² 20 United States Code §1401(3).

⁸³ 20 United States Code §1401(9).

⁸⁴ 20 United States Code §1412.

⁸⁵ 20 United States Code §1414(d). This section includes a number of requirements that must be satisfied when developing IEPs.

⁸⁶ Iowa Code §273.5.

⁸⁷ Iowa Code §273.9(2).

⁸⁸ Iowa Code §273.9(2).

⁸⁹ For more information regarding the current provision of special education support services to nonpublic school students as well as recent recommendations for changes to that system, see the legislative task force report submitted to the Iowa General Assembly in December 2022. Legislative Task Force 2197 (published on December 1, 2022), Special Education Support for Students Enrolled in Nonpublic Schools. Available at: <https://educateiowa.gov/sites/default/files/2022-12/22.12.1SpecialEducationSupportTaskForceSF2197.pdf>.

⁹⁰ Iowa Code §273.5(1)-(6); 281 Iowa Administrative Code 41.

Figure 11: Iowa AEA Special Education Responsibilities

Special Education Responsibilities of AEAs**(Iowa Code §§256B.15(6), 273.5, and 273.9(2) and 281 Iowa Administrative Code 72.4(12))**

- Special education instruction services (when contracted by school districts to provide these services)
- Identifying children requiring special education (Child Find)
- Ensuring special education students receive free appropriate programs or services (FAPE)
- Assigning funding weights for special education students
- Supervising special education support personnel
- Providing each district in its service area and the Iowa Department of Education with a special education weighted enrollment count
- Submitting annual special education instructional and support program plans and applications to the Iowa Department of Education
- Coordinating the special education program in its service area
- Providing Medicaid billing services
- Providing service coordination for Iowa's Early ACCESS System, which provides early intervention services under IDEA Part C

Other AEA Services

AEAs must also provide media and educational services to Iowa's school districts.⁹¹ An AEA must provide additional services upon the request of 60% of the school boards in the AEA or school boards representing 60% of the student enrollment in districts located in the AEA.⁹² Although school districts have this authority, not all districts are able to take advantage of it equally. Rural districts collectively may not have enough student enrollment on their own to reach the 60% threshold to request additional AEA services.

The specific media services and educational services that AEAs must provide are detailed in the following sections.

⁹¹ Iowa Code Chapter 273; 281 Iowa Administrative Code Chapter 72.

⁹² Iowa Code §273.7.

Media Services

AEAs are required to provide media services.⁹³ Iowa Code does not define “media services” but requires that AEAs have media centers with all of the following:

- A print and nonprint materials lending library;
- A professional library;
- A curriculum laboratory;
- Capability for production of media-oriented instructional materials;
- Qualified media personnel;
- Appropriate physical facilities; and
- Other necessary materials and equipment, as determined by the Iowa Department of Education.⁹⁴

Additionally, AEA media services must (1) align with school and school district needs; (2) support effective instruction; (3) provide consultation, research and information services, instructional resources, and materials preparation and dissemination; (4) support the implementation of content standards in reading, math, science, and other subjects; and (5) support and integrate emerging technology.⁹⁵

Educational Services

AEAs are also required or authorized to provide a variety of educational services in the categories listed in Table 4.⁹⁶ Further information about these services is provided in Appendix B.

Table 4: Summary of Iowa AEA Educational Services

Required AEA Services	Permitted AEA Services
<ul style="list-style-type: none"> • Gifted services • Interlibrary loans • Services for school-community planning • Professional development services • Curriculum, instruction, and assessment services • Services that support “multicultural, gender-fair approaches” to Iowa’s educational program • School technology services that supplement and support effective instruction for all students 	<ul style="list-style-type: none"> • In-service training programs • Educational data processing • Research, demonstration projects and models, and educational planning • Auxiliary services for nonpublic school students • Other educational programs and services • Online learning for Iowa educators professional development project • Contracted services for school districts • Online learning program

⁹³ Iowa Code §§273.1 and 273.2(4).

⁹⁴ Iowa Code §273.5.

⁹⁵ 281 Iowa Administrative Code §72.4(6).

⁹⁶ Iowa Code §§256.9(11), §256.12(2)(a), 256.42(3), 273.2(4) and (5), 273.7A(1), and 273.16; Iowa Code Chapter 284; and 281 Iowa Administrative Code §72.4.

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Required AEA Services	Permitted AEA Services
<ul style="list-style-type: none"> • Services that develop leadership based upon the Iowa Standards for School Administrators • Program and services evaluation and reporting system • Early childhood service coordination support 	

AEA Finance

AEAs have a breadth of funding sources and expenditures. In FY23, AEAs were budgeted to receive over half a billion dollars, with the majority coming from state and local sources. The following analysis describes detailed findings derived from Iowa and US Department of Education data concerning AEA revenue and expenditure trends, the flow of funding to AEAs, and disparities in staffing costs between AEAs and school districts.

AEAs receive funding from federal, state, and local sources, as displayed in Figure 12.⁹⁷ The majority of AEA revenue comes from state aid and local property tax dollars in addition to federal funds and grants that are often a part of special education provision.

Figure 12: Sources of Iowa AEA Revenues in Fiscal Year 2023

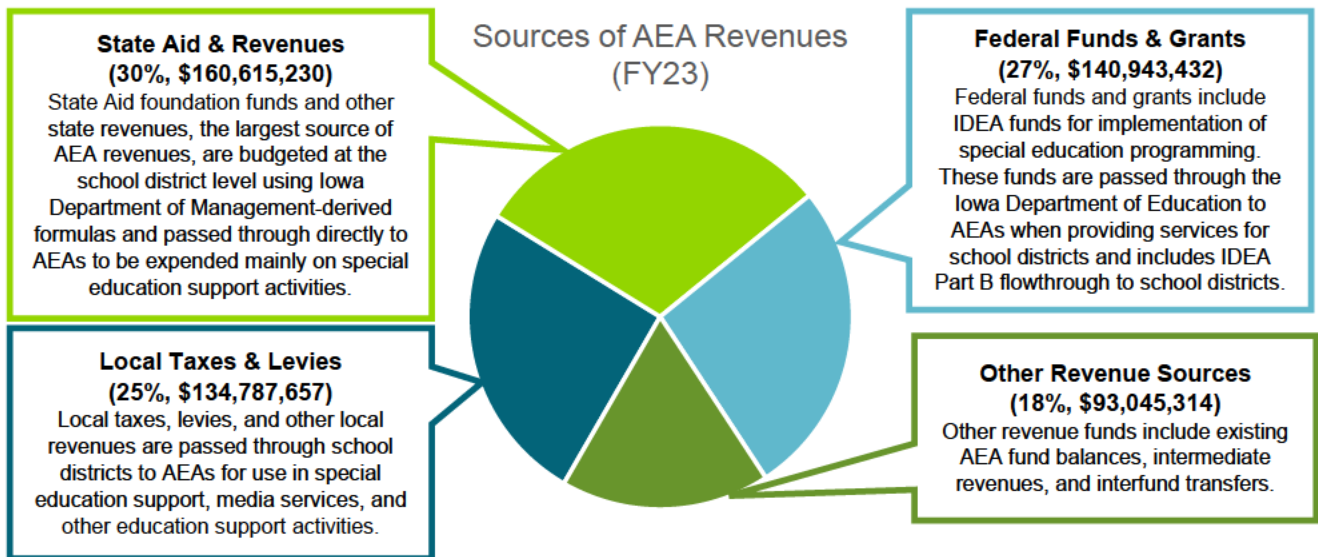


Figure 12 is based on information from the Iowa Legislature's Legislative Services Agency presentation on state school aid.⁹⁸ Revenue data is derived from the FY23 Annual Budget Approval for AEAs.⁹⁹

⁹⁷ Iowa Code §273.9.

⁹⁸ Iowa Legislative Services Agency (published in January 2022). Dollars and Donuts—State School Aid. Available at <https://www.legis.iowa.gov/docs/publications/FLL/1285913.pdf>.

⁹⁹ Iowa State Board of Education (published March 24, 2022). Fiscal Year 2022-2023 Annual Budget Approval for Area Education Agencies (AEAs). Available at <https://educateiowa.gov/sites/default/files/documents/2022-03-24%20AEA%20Budgets.pdf>.

Overview of State and Local Funding Structure

Like other Iowa education programs, AEA state funding is determined through the school aid formula on a per-pupil basis, with specific AEA functions' funding (special education support services, media services, educational services, teacher salary and professional development supplements, and shared operational functions) calculated through a mixture of weighted and unweighted pupil enrollments and AEA costs per pupil. These per-pupil costs are subject to state percent of growth, which is determined by the Iowa General Assembly on an annual, or near-annual, basis during the budget process. Which pupils are counted for the purposes of funding also varies between functions, with some (media services, educational services) including public and nonpublic school pupils served, while special education funding relying upon school district weighted enrollment counts.¹⁰⁰

The sources of AEA funding also vary between state-funded functions, with some (professional development, teacher salary supplement) funded exclusively through state aid dollars, some (educational services) funded through property taxes, and others (special education supports, supplementary weighting for sharing) funded through a combination of the two.¹⁰¹ Iowa's Department of Management is responsible for calculating the weighted and unweighted state and local portions of revenues that are ultimately earmarked and paid from school districts' school finance formula funding.

Though this funding structure is often referred to as "flow-through" funding and is budgeted at both the school district and AEA level, these funds are not disbursed to school districts and instead are paid directly to AEAs, as demonstrated in Figure 13.¹⁰² Additional resources are available from the Iowa Legislative Services Agency that further examines Iowa's school district and AEA school funding formulas.^{103, 104}

¹⁰⁰ Iowa Legislative Services Agency - Legal Services Division (published in December 2018), Legislative Guide - Area Education Agencies. Available at: <https://www.legis.iowa.gov/docs/publications/LG/970645.pdf>.

¹⁰¹ Iowa Legislative Services Agency - Fiscal Services Division (published on December 14, 2022), Fiscal Topics - School Aid, Area Education Agency Funding, FY23. Available at: <https://www.legis.iowa.gov/docs/publications/FTNO/1304444.pdf>.

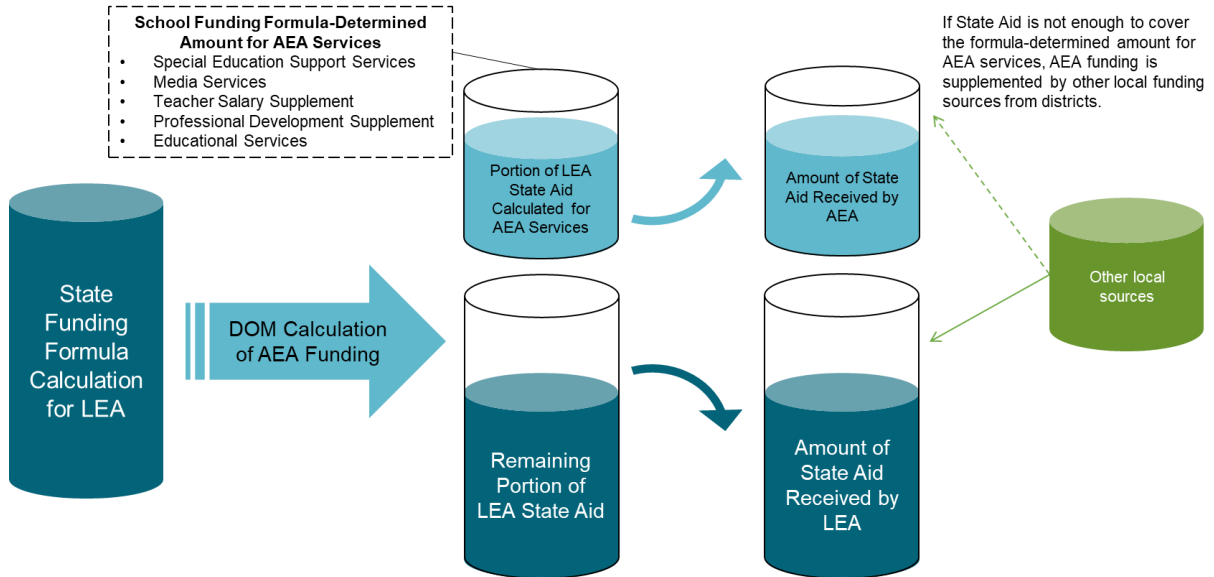
¹⁰² bid.

¹⁰³ Iowa Legislative Services Agency - Legal Services Division (published in December 2018), Legislative Guide - Area Education Agencies. Available at: <https://www.legis.iowa.gov/docs/publications/LG/970645.pdf>.

¹⁰⁴ Iowa Legislative Services Agency - Fiscal Services Division (published on December 14, 2022), Fiscal Topics - School Aid, Area Education Agency Funding, FY23. Available at: <https://www.legis.iowa.gov/docs/publications/FTNO/1304444.pdf>.

Figure 13: Summary Representation of AEA Funding Calculation Process

AEA Funding Calculation Process



Analysis of AEA State and Local Budgeted Revenue

Excluding federal funds for purposes of this analysis, AEA budgets have largely been a stable mix of state aid and local property tax dollars over the past ten fiscal years. Using an inflation calculator to standardize budgets for comparison in 2023 dollars, analysis shows that total AEA revenues from state aid and property tax has largely been stable since FY14 (the year which Iowa Department of Management budget data presents the split of state aid and property tax funds), averaging roughly \$267 million annually across the nine AEAs as demonstrated in Figure 14.¹⁰⁵

¹⁰⁵ US Inflation Calculator (accessed on October 10, 2023), Inflation Calculator. Available at: <https://www.usinflationcalculator.com/>.

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Figure 14: AEA Total Revenues from State Aid and Property Tax From FY14 Through FY24, Adjusted for Inflation

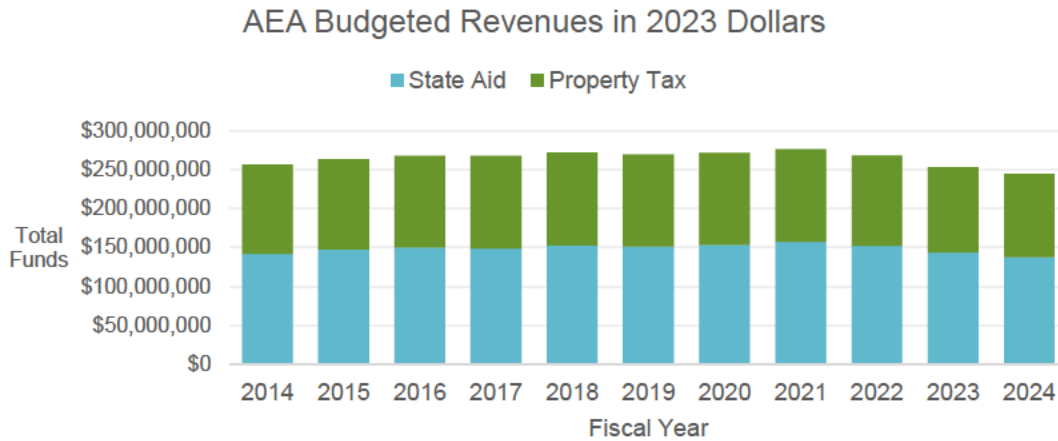


Figure 14 shows that AEA’s funding mix of state and local dollars has stayed consistent over the past ten years, ranging from a mix of 55% state aid and 45% property taxes to 57% state aid and 43% property taxes.¹⁰⁶ Additional historical total AEA budget data, including budgets unadjusted for inflation stretching back to FY07 which does not include the split between state aid and property tax sources, is available in Appendix F.2.

¹⁰⁶ Iowa Department of Management (accessed on October 11, 2023), AEA Enrollment and Cost Detail, FY24. Available at: <https://dom.iowa.gov/aea-enrollment-costs?page=0>.

AEA Special Education Expenditures

Based on National Center for Education Statistics (NCES) data, AEA in Iowa spent roughly 63% of their total expenditures in FY20 on special education-related activities, with individual AEAs spending between 48% to 71% of their budgets on special education.¹⁰⁷ See Appendix F.1, Figure 29 for a detailed breakdown of NCES-reported AEA total expenditure and special education expenditure categorizations.

Figure 15: AEAs' Special Education Expenditures by Type

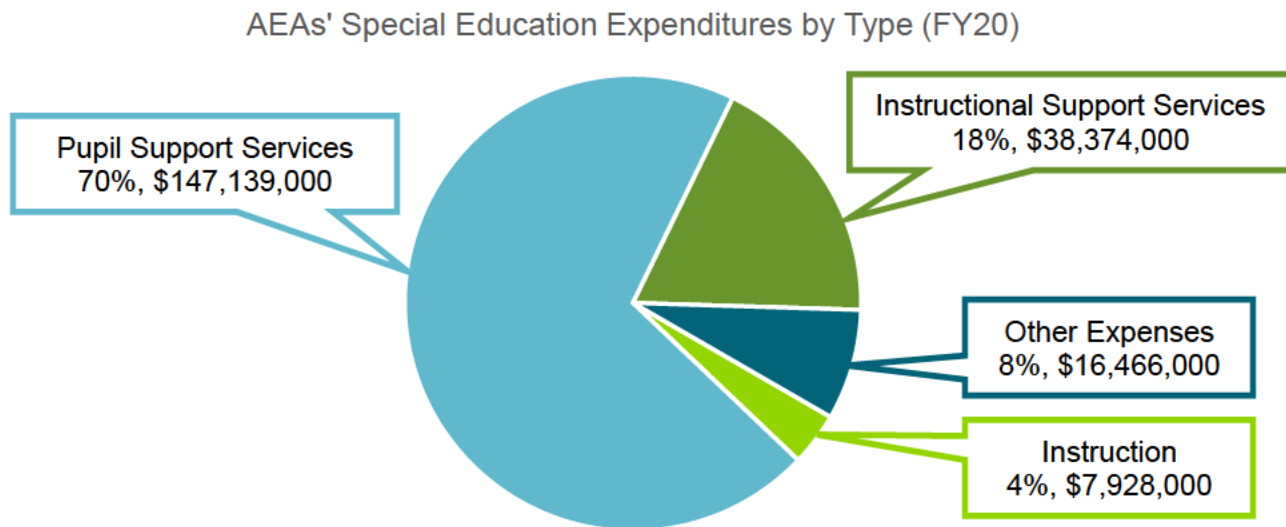


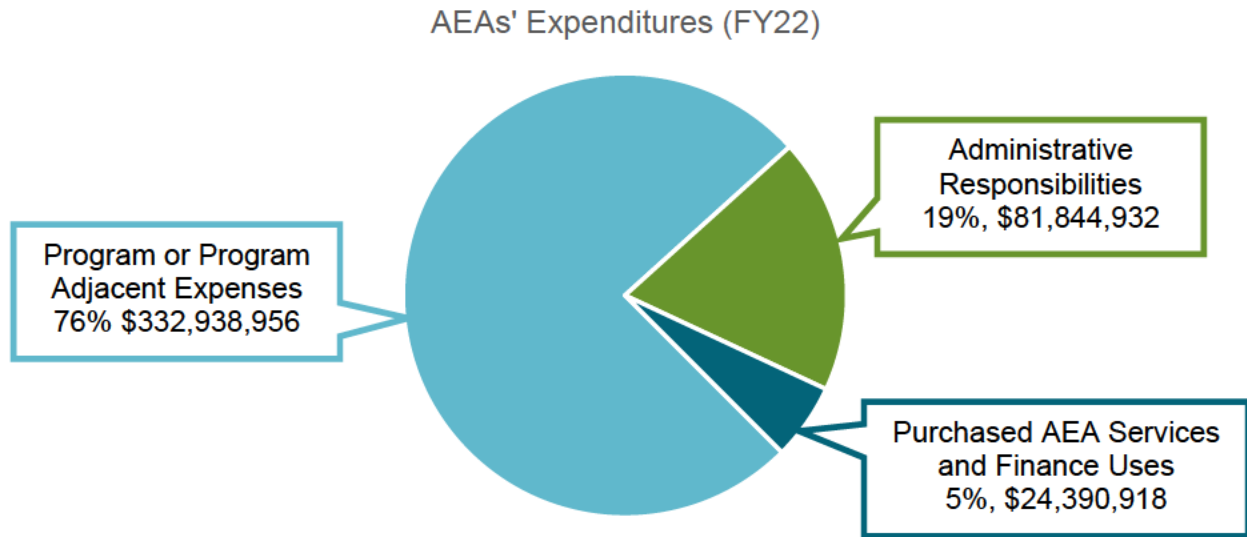
Figure 15 breaks down the 62.8% (\$209,907,000) of AEA’s total expenditures spent on special education in FY20 based on NCES expenditure reporting categories. AEAs spent the largest fraction of their special education funds on special education pupil support services (70%), with the next largest amount expended on instructional support service activities (18%).

AEAs’ FY22 expenditures, derived from the 2022 Iowa Certified Annual Report (CAR), were analyzed based on the Iowa Chart of Account Coding’s function, program, and object header codes, and bucketed into three broad categories that capture the ultimate use and purpose of expenditures across Iowa’s education ecosystem. Expenditures that are already included in other categories (for example, internal service funds) and funds held and expended for other entities (for example, funds held by the AEA acting as a fiscal agent for a school district) were removed from analysis to avoid double-counting of expenditures.

Figure 16 demonstrates this cost type analysis, ultimately showing that the majority of AEA funds (76% or \$332,938,956) were expended on direct instructional costs or costs incurred to directly support educational programs. These expenditures include classroom teachers, classroom materials, instructional support services, and professional development for staff. Additional detail on the methodology of this analysis, including details on the categorization of expenditures, is available in Appendix F.3.

¹⁰⁷ US Department of Education, National Center for Education Statistics (accessed in September 2023), CCD Data Files 2019-2020, District Finance Survey (F-33). Available at: https://nces.ed.gov/ccd/files.asp#Fiscal:1_LevelId:5_Page:1.

Figure 16: AEA's Expenditures by Cost Type (FY22)



Staffing Costs

Analysis of AEA expenditures also included an examination of staffing costs across both AEA and school districts. The 2022 Iowa Condition of Education report details the number of instructional and noninstructional full time staff employed throughout Iowa's public districts, nonpublic schools, and AEA, and also provides demographic, salary, experience, and position details. This data is derived from the Basic Educational Data Survey (BEDS) Fall 2021 report to the Iowa Department of Education.¹⁰⁸ Data from the 2022 Condition of Education Report was used to analyze LEA staffing counts and salaries. Data derived from the Fall 2022 BEDS report was provided by the Iowa Department of Education to analyze AEA staffing, which also included part-time staff in addition to full time staff available in the Condition of Education report.

Iowa's nine AEA have 3,425 full- and part-time positions and employ 3,413 persons, including 129 administrators, as defined by the Fall 2022 Iowa Staff Position Code Set (code 500-599).¹⁰⁹ Iowa's 327 public districts and nonpublic schools employed 44,094 full-time staff members, including 2,264 administrators. The average of all school district full-time positions' average salaries was \$79,493; the AEA average of all full- and part-time positions' average salaries was \$79,240. Table 5 details the salary and staff counts of administrators across school districts and AEA as shown in the Fall 2021 BEDS data for school districts and Fall 2022 BEDS data for AEA. Additional details for position titles, average salaries, and staff counts are available in Appendix F.4.

¹⁰⁸ Iowa Department of Education Bureau of Information and Analysis Services (accessed on October 12, 2023), 2022 Condition of Education Report, Staff Characteristics by Group, Position, District. Available at: <https://reports.educateiowa.gov/COE/Home/staffPositionsByDistrict?Length=4>.

¹⁰⁹ Iowa Department of Education (accessed October 25, 2023). 2022-2023 Fall Staff Code Sets. Available at: <https://educateiowa.gov/documents/2022-2023-fall-staff-code-sets>.

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Table 5: Average Administrator Positions and Salaries between School Districts and AEAs

School District Administrator Positions	Average Total Salary	Staff Count	AEA Administrator Positions*	Average Total Salary	Staff Count
Superintendent	\$166,986	263	AEA Chief Administrator	\$240,693	9
Assistant Superintendent	\$159,458	24	Other Administrator	\$154,291	15
Principal	\$111,502	1158	AEA Regional/Zone Coordinator	\$134,489	91
Special Education Director	\$109,469	62	Special Education Director	\$132,354	14

*Positions with only one staff member hired are not included in this analysis.

Operational Performance

Iowa's AEAs play a key role in the implementation of Parts B and C of IDEA. Each year, the US Department of Education issues annual determinations for IDEA Parts B and C, based on "the State's efforts to implement the requirements and purposes of IDEA, and describes how the State will improve its implementation." This annual process examines the status and progress of the state's IDEA implementation against a series of indicators.¹¹⁰ The US Department of Education issued its FY21 determinations for state implementation of IDEA Parts B and C in June 2023, and designated that Iowa "needs assistance (for two or more consecutive years)" for both Parts B and C. Iowa ranks as one of 13 states to be placed in the "needs assistance (for two or more consecutive years)" for IDEA Part C, and as one of 22 states for IDEA Part B.^{111, 112}

Iowa's FY21 IDEA Parts B and C compliance report found that issues related to the provision of early childhood services, among others, were partially due to AEA performance and monitoring practices.^{113, 114} AEA staffing illness, scheduling conflicts, and agency holidays were specifically identified as problems that contributed to issues of noncompliance on key indicators. For further detail, Appendix D includes insights from the latest US Department of Education determination letters and highlights select IDEA Parts B and C indicators that did not meet target benchmarks in part due to AEA service provision, the status and measurement of indicator targets, and information related to AEA involvement in issues of noncompliance.

As part of this determination, the US Department of Education must take one or more enforcement actions, which may include "requiring the State to access technical assistance, designating the State as a high-risk grantee, or directing the use of State set-aside funds to the area(s) where the State needs assistance."¹¹⁵ An additional year of a finding of "needs

¹¹⁰ US Department of Education (accessed on October 6, 2023), 2023 Determination Letters on State Implementation of IDEA. Available at: <https://sites.ed.gov/idea/idea-files/2023-determination-letters-on-state-implementation-of-idea/>.

¹¹¹ *bid.*

¹¹² The states included in these counts do not include US territories, freely associated states, the Bureau of Indian Education, or the District of Columbia.

¹¹³ US Department of Education (published on June 23, 2023), 2023 SPP/APR and State Determination Letters, Part B-Iowa. Available at: <https://sites.ed.gov/idea/idea-files/2023-spp-apr-and-state-determination-letters-part-b-iowa/>.

¹¹⁴ US Department of Education (published on June 21, 2023), 2023 SPP/APR and State Determination Letters, Part C-Iowa. Available at: <https://sites.ed.gov/idea/idea-files/2023-spp-apr-and-state-determination-letters-part-c-iowa/>.

¹¹⁵ US Department of Education (accessed on October 6, 2023), 2023 Determination Letters on State Implementation of IDEA. Available at: <https://sites.ed.gov/idea/idea-files/2023-determination-letters-on-state-implementation-of-idea/>.

assistance” will require the US Department of Education to “take one or more enforcement actions, including among others, requiring a corrective action plan or compliance agreement, or withholding further payments to the State.”¹¹⁶

Though one of many actors involved in the provision of special education services in Iowa, AEAs’ shortcomings in meeting critical IDEA indicators are amplified by their key role as Regional Grantees in the implementation of IDEA Part C and related activities in IDEA Part B. As this report suggests, opportunities exist to improve how AEAs function and are governed in order to meet the needs of Iowa’s students and children as specified in IDEA.

Governance and Oversight

AEAs are primarily governed and overseen by a board of directors made up of community members or school district board members. School district employees are prohibited from serving on AEA board of directors but may serve on AEA advisory groups that provide “recommendations” to AEAs. The Iowa Department of Education and Iowa State Board of Education have some limited direct oversight and accountability over AEA functions and performance.

AEA Board of Directors

Each AEA is governed by an elected board of directors consisting of five to nine members. School districts are grouped into director districts (multiple director districts make up one AEA). Each director district of an AEA elects one AEA board member. School district board members then vote on and elect an AEA director to represent their director district. To qualify as a candidate for AEA director, an individual must be an elector, resident of the director district, and submit a statement of candidacy.¹¹⁷

Members of school district boards may be candidates, but employees of school districts are prohibited from holding AEA director positions. This prohibits school district superintendents and other public and nonpublic school leaders from having ability to exercise direct oversight over AEAs as a key special education support service provider.¹¹⁸

Each AEA’s board of directors has oversight over the AEA’s operations, including the employment of the AEA’s administrator and all other personnel.¹¹⁹ The board has the authority to determine the AEA’s policies for providing programs and services, receive and expend money for providing programs and services, and provide its services directly or by contractual arrangement with public or private agencies, as well as many other duties and powers related to the services and functions of AEAs.¹²⁰ AEAs are required to submit to its board of directors an annual progress report on external data sources that measure the effectiveness of services and the AEA’s goals.¹²¹

¹¹⁶ US Department of Education (published on June 21, 2023), 2023 SPP/APR and State Determination Letters, Part C-Iowa. Available at: <https://sites.ed.gov/idea/idea-files/2023-spp-apr-and-state-determination-letters-part-c-iowa/>.

¹¹⁷ Iowa Code §273.8.

¹¹⁸ Iowa Code §273.8.

¹¹⁹ Iowa Code §273.3(11).

¹²⁰ Iowa Code §273.3.

¹²¹ 281 Iowa Administrative Code 72.10(73).

State-Level Oversight

An AEA is accredited by the State Board of Education if it (1) provides services that meet specified standards, (2) establishes a comprehensive improvement plan, (3) submits a budget that is approved by the State Board, and (4) provides an annual progress report.¹²² In order to receive accreditation, an AEA goes through an accreditation process that consists of the timely submission of required information and an evaluation by an accreditation team that includes an on-site visit.¹²³ This team makes a recommendation to the Iowa Department of Education director and the State Board of Education regarding accreditation, and the State Board of Education decides whether to grant accreditation for up to five years to the AEA.¹²⁴ If an AEA is not granted accreditation, the Iowa Department of Education director must establish a remediation plan for the AEA and a deadline for the AEA to correct its deficiencies.¹²⁵

Other current state-level AEA oversight mechanisms include:

- The Iowa Department of Education’s compliance monitoring, desk audits, reporting verification, and professional development and technical assistance related to IDEA Part B and C implementation;^{126, 127}
- Requirement for AEAs to submit their comprehensive improvement plan;¹²⁸
- Requests for AEA boards of directors to provide data and prepare reports as directed by the Director of the Department of Education;¹²⁹
- The Director of the Iowa Department of Education’s approval of AEA agreements for “the joint use of personnel, buildings, facilities, supplies, and equipment with school corporations as deemed necessary to provide authorized programs and services;” and¹³⁰
- The Director of the Iowa Department of Education’s approval for the leasing of property by AEAs.¹³¹

AEA Advisory Group

Iowa state law requires that the board of directors of each AEA appoint an advisory group to “make recommendations on policy, programs, and services” to the AEA board of directors. AEA advisory groups are required to meet twice per year and submit an annual recommendation report. The report must be “timely” submitted to allow for the recommendations to inform the AEA’s planning and budgeting process for the next fiscal year.¹³²

AEA advisory groups consist of the following members:

¹²² Iowa Code §§273.10(3)(a) and 273.11; 281 Iowa Administrative Code §72.3.

¹²³ An AEA’s accreditation team is appointed by the director of the Iowa Department of Education and, at a minimum, consists of Iowa Department of Education staff members, school district representatives (from districts served by the AEA), staff members from other AEAs, and other team members with expertise (Iowa Code §273.10(1)(b)).

¹²⁴ Iowa Code §273.10(2) and (3).

¹²⁵ Iowa Code §273.10(4)-(6).

¹²⁶ US Department of Education (published June 21, 2023), 2023 SPP/APR and State Determination Letters, Part C-Iowa. Available at: <https://sites.ed.gov/idea/idea-files/2023-spp-apr-and-state-determination-letters-part-c-iowa/>.

¹²⁷ US Department of Education (published on June 23, 2023), 2023 SPP/APR and State Determination Letters, Part B-Iowa. Available at: <https://sites.ed.gov/idea/idea-files/2023-spp-apr-and-state-determination-letters-part-b-iowa/>.

¹²⁸ 281 Iowa Administrative Code 72.9(273).

¹²⁹ Iowa Code §273.3(3).

¹³⁰ Iowa Code §273.3(8).

¹³¹ Iowa Code §273.3(21).

¹³² Iowa Code §273.15(1).

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- A minimum of three superintendents employed by school districts served by the AEA (at least one from a small, medium, and large school district);
- A minimum of three principals employed by school districts served by the AEA (at least one from an elementary, middle, and high school);
- At least four teachers employed by school districts served by AEA (at least one member representing each of the following: early childhood, elementary school, middle school teachers, and high school. At least one of the teachers appointed must represent general education and at least one must represent special education. At least one of the teachers appointed must represent other school related personnel, like media and technology specialists and counselors);
- A minimum of three parents or guardians of school age children receiving services from the AEA (at least one that must be a parent or guardian of a child requiring special education); and
- One member that represents accredited nonpublic schools located in the AEA's boundaries.¹³³

AEA board of directors are required to “collaborate” with superintendents and school boards of school districts served by the AEA when appointing AEA advisory members.¹³⁴

¹³³ Iowa Code §273.15(2).

¹³⁴ Iowa Code §273.15(3).

IV. Recommendations for Improving the Education of Students with Disabilities in Iowa

The six recommendations below directly address challenges to improving education for students with disabilities in Iowa identified by this report's research and analyses:

1. **Local Control:** Allow School to Opt-In to the AEA System and to Choose Best Way to Support Students with Disabilities.
2. **Services:** Concentrate AEA Service Offerings to Focus on Students with Disabilities.
3. **Funding:** Restructure AEA Funding Process to Reflect School District Choice to Opt-In to AEA System.
4. **Performance:** Increase State and Local Oversight and Accountability of AEAs.
5. **Empower:** Grow Iowa Department of Education Funding, Capabilities, and Infrastructure to Provide Greater Levels of Special Education and AEA Oversight.
6. **Transparency:** Develop Clear Special Education Roles and Responsibilities for School Districts, AEAs, and the Iowa Department of Education.

1. Local Control: Allow School Districts to Opt-In to the AEA System and to Choose Best Way to Support Students with Disabilities.

Under Iowa's current AEA system, school districts are required to "cooperate" with AEAs "to provide an appropriate special education instructional program for each child who requires special education instruction."¹³⁵ Importantly, IDEA does not require states to have a system of educational service agencies or that school districts work with those entities to provide special education. IDEA allows for school districts to provide special education services without educational service agency support.

According to a March 2021 report by the Association of Educational Service Agencies, Iowa is the only state that requires all school districts to participate and pay into an educational service agency using the school district's own funding and requires that school districts cooperate with the educational service agency for special education services.¹³⁶ Additionally, four out of six indicator states have voluntary educational service agency systems.¹³⁷

¹³⁵ Iowa Code §273.9(2).

¹³⁶ Association of Educational Service Agencies (published in March 2021), State by State ESA Report. Available at: <https://www.waesd.org/wp-content/uploads/2021/04/AESA-ESA-State-by-State-Report-March-2021.pdf>.

¹³⁷ The states with voluntary educational service agency systems are the following: Florida (see Florida Statutes §§1001.451 and 1006.03), South Dakota (see South Dakota Codified Laws §§13-5-31 through 13-5-33.2), Tennessee (see Tennessee Code Annotated §§49-2-1301 through 49-2-1308), and Texas (see Texas Education Code §§8.001 through 8.158).

Allowing school districts to have a choice to opt-in to an AEA will enhance school districts’ local control and decision-making authority to create a special education system that aligns with their communities’ needs. Creating a voluntary AEA system would also incentivize AEAs to provide high-quality services to school districts, as AEAs would now be one of many options that school districts could use for special education services and other providers may be more economical, reliable, or higher performing.

2. Services: Concentrate AEA Service Offerings to Focus on Students with Disabilities.

AEAs currently provide a variety of non-special education services (e.g., printing, media services, other shared services) to school districts. Based on FY20 NCES data, over a third of AEA total expenditures (37.2%) were spent in areas not related to special education.¹³⁸ Focusing a significant portion of its staff and resources to non-special education areas further removes AEAs from their purpose “to be an effective, efficient, and economical means of identifying and serving children from birth to age 21 who require special education services.”¹³⁹ **AEA service offerings should be reduced to focus solely on the provision and support of special education services for school districts who choose to receive these services from their respective AEAs.**

Importantly, school districts, other organizations, or mechanisms like cooperative agreements between multiple school districts could deliver nearly all special education and non-special education services currently offered by AEAs. Table 6 displays what special education services AEAs could continue to provide and how school districts could continue to access non-special education services currently provided by AEAs.

Table 6: Recommended Redistribution of Current AEA Service Responsibilities

AEA Service		Service Provider or Mechanism				
		Department of Blind	IDE	School Districts ¹⁴⁰	AEAs	Cooperative Agreements
Special Education Services	IDEA, Part B			School District Decision		
	IDEA, Part C					
	Private School Students					
	Special Education Instruction Support					
Juvenile Detention Centers					✓	
Braille Media Services		✓				

¹³⁸ US Department of Education, National Center for Education Statistics (accessed in September 2023), CCD Data Files 2019-2020, District Finance Survey (F-33). Available at: https://nces.ed.gov/ipeds/data/ipeds_data_files_2019-2020/district_finance_survey/

¹³⁹ Iowa Code §273.1.

¹⁴⁰ School districts may leverage support from variety of entities to implement these services, including state departments and local partners, as applicable.

AEA Service	Service Provider or Mechanism				Cooperative Agreements
	Department of Blind	IDE	School Districts ¹⁴⁰	AEAs	
Professional and Instructional Development		✓	✓		<i>School District Decision</i>
Printing and Media Services			✓		
Other Shared Services and Cooperative Purchasing					
Support Implementing State Education Technology Systems		✓	✓		
School District Infrastructure Support			✓		

3. Funding: Restructure AEA Funding Process to Reflect School District Choice to Opt-In to AEA System

As recommended in this report, if AEAs become optional resources for school districts to access special education services, then **the current financing structure that requires that all school districts pay into the AEA system should also be amended.** State and federal special education funds for school districts who opt-in to the AEA system should continue to flow from the Iowa Department of Education to AEAs. State and federal special education funds for school districts who do not opt-in to the AEA system should flow directly to school districts.

To ensure that AEAs are providing value to school districts that opt-in to the AEA system for special education services, AEAs should cover the full cost of FAPE for all students with disabilities. AEAs may offer additional special education support services not required to obtain FAPE and should only charge at-cost for them.

4. Performance: Increase State and Local Oversight and Accountability of AEAs

In comparison to indicator state educational service agency systems, few direct oversight or governance mechanisms exist for school district staff and the Iowa Department of Education to exercise over AEAs, particularly in the areas of budget and personnel. ¹⁴¹ As evidenced in

¹⁴¹ Oversight and governance mechanisms for AEAs and the educational service agencies in the indicator states was verified through each state's statutes and administrative rules, as well as an examination of a sampling of websites for each state's educational service agencies. Additionally, information about Florida was obtained from its Request for Application for the Florida Diagnostic and Learning Resources System. The relevant information and sources for Iowa and each applicable indicator state are as follows:

- Iowa – state-level budget approval; local school district oversight on advisory committee or board of directors (Iowa Code Chapter 273);

Iowa's students with disabilities academic performance and IDEA compliance, **AEAs should improve their operations and performance of services, but the Iowa Department of Education and school district staff lack the appropriate mechanisms to effect direct operational change at AEAs.** To ensure that AEAs are making progress and providing requisite levels of quality to school districts, Iowa should consider the following key changes to the AEA oversight and governance system:

Shift Current Iowa State Board of Education Oversight Functions to Director of the Iowa Department of Education

Currently, the Iowa State Board of Education exercises some oversight functions over AEAs, including accrediting AEAs and approving their annual budgets. While each state's board of education functions differently with different authorities, according to the National Association of State Boards of Education, state boards of education generally have authority to do the following:

- Adopt learning standards that all students are expected to achieve;
- Have primary authority over state summative assessments;
- Establish high school graduation requirements;
- Determine qualifications for professional education personnel;
- Establish state accountability and assessment programs; and
- Establish standards for accreditation of school districts and preparation programs for teachers and administrators.¹⁴²

Since state boards of education generally focus on adopting and revising policies, **all current state board of education oversight and governance mechanisms should be moved to the Director of the Iowa Department of Education to help ensure state-level oversight and governance over AEAs is consistent.** Importantly, the Director of the Iowa Department of Education is already charged under current state law to supervise and oversee school districts and oversees AEA IDEA compliance.¹⁴³

- Florida – state-level oversight of leadership employment and budget approval; local school district oversight on advisory committee or board of directors (Florida Statutes §§1001.451 and 1006.03; Florida's Request for Application for the Florida Diagnostic and Learning Resources System);

- Georgia – state-level budget approval; local school district oversight on advisory committee or board of directors (Official Code of Georgia Annotated §§20-2-270 through 20-2-274);

- Tennessee – state-level budget oversight functions (Tennessee Code Annotated §§49-2-1301 through 49-2-1308);

- Texas – state-level oversight of leadership employment, budget approval and additional budget oversight functions, and authority to close educational service agencies with cause (Texas Education Code §§8.001 through 8.158; Texas Administrative Code §53.1001).

¹⁴² National Association of State Boards of Education, About State Boards of Education (accessed in September 2023). Available at:

<https://www.nasbe.org/about-state-boards-of-education>.

¹⁴³ Iowa Code §256.9(20).

Increase Iowa Department of Education AEA Oversight and Accountability Mechanisms

In comparison to indicator states, the Iowa Department of Education lacks key oversight and governance mechanisms over AEA's. The Department also lacks a framework to track and measure AEA academic, operational, and financial performance.

Oversight and Governance Mechanisms

In comparison to indicator states Texas, Florida, and Tennessee, the Iowa Department of Education lacks key personnel and budgetary oversight and governance functions over AEA's. In these three states that all perform better for students with disabilities than Iowa, the leaders of their state departments of education are empowered to have key decision-making authority over their educational service agency equivalents – particularly in the areas of budget and personnel.¹⁴⁴ **To help improve and better oversee AEA operations, finances, and special education services, the Director of the Iowa Department of Education should, at minimum, have authority over the following attributes and functions of AEA's:**

- Hiring and discharge of the highest-level administrator in each AEA and the selection of an interim leader;
- Establishment of the number of AEA's;
- AEA boundaries and process of reorganization;
- Allocation of AEA budgets; and
- Special education materials and instructional strategies.

This authority allows the state's chief elementary and secondary education leader to ensure these entities are effective and operationally compliant. While the Iowa Department of Education already has the authority to conduct compliance monitoring, desk audits, reporting verification, and professional development and technical assistance related to IDEA Part B and C implementation, as further explained in Recommendation 5, additional resources would enable the Department to invest in infrastructure to better monitor and support AEA's in compliance with federal requirements.

Texas: Oversight and Governance Model

In Texas, the Commissioner of Education “may decide any matter concerning the operation or administration” of its educational service agencies, including:

- Approving the hiring and firing of highest-level administrator of each educational service agency;
- The number and locations;
- Regional boundaries; and

¹⁴⁴ Oversight and governance mechanisms for AEA's and the educational service agencies in the indicator states was verified through each state's statutes and administrative rules, as well as an examination of a sampling of websites for each state's educational service agencies. Additionally, information about Florida was obtained from its Request for Application for the Florida Diagnostic and Learning Resources System. The relevant information and sources for Iowa and each applicable indicator state are as follows:

- Florida – state-level oversight of leadership employment and budget approval; local school district oversight on advisory committee or board of directors (Florida Statutes §§1001.451 and 1006.03; Florida's Request for Application for the Florida Diagnostic and Learning Resources System);

- Texas – state-level oversight of leadership employment, budget approval and additional budget oversight functions, and authority to close educational service agencies with cause (Texas Education Code §§8.001 through 8.158; Texas Administrative Code §53.1001).

- Allocations among centers of state and federal funds administered by the state department of education.^{145, 146}

Tennessee: Oversight and Governance Model

Likewise in Tennessee, the Commissioner of the Department of Education is responsible for monitoring educational service agencies.¹⁴⁷ The Department can prohibit participating educational service agency school districts from expending state funds on their educational service agency if deemed “necessary” by the commissioner.¹⁴⁸ If a school district continues to spend funds on the educational service agency’s services that the commissioner deems in their opinion as “not providing an adequate and economic service to the school districts,” the Department may withhold that funding from school districts.¹⁴⁹

Florida: Oversight and Governance Model

Additionally, in the Florida Department of Education’s federal grant agreements for its educational support agencies (Florida Diagnostic and Learning Resources System [FDLRS]), the Department reserves the right to participate in the selection of grant-funded project staff to ensure the candidate and position is aligned to current stakeholder needs.¹⁵⁰

Annual and Interim Accountability Reporting

Frequent accountability reporting for educational service agencies provide AEAs, school districts, families, and policymakers with clear information about AEA performance. **AEAs should be required to submit interim and annual accountability reports using standardized metrics across all AEAs to the Iowa Department of Education to measure each AEA’s academic, operational, and financial progress.** Annual accountability reports are also found in one indicator state, Texas. The reports should be publicly available and posted on AEA and the Iowa Department of Education’s websites. If additional data is needed to measure AEA performance, the Department of Education should exercise its existing authority to request data and reports from AEAs.¹⁵¹

Texas: Annual Accountability Reporting Model

Texas requires that the Commissioner of the Department of Education complete an annual evaluation of each educational service agency and its executive director. Each Texas educational service agency annual evaluation includes:

- An audit of the educational service agency’s finances;
- Review of the educational service agency’s performance on the following indicators:
 - Student performance in districts served;

¹⁴⁵ Texas Education Code §8.001(c).

¹⁴⁶ Texas Education Code §8.004.

¹⁴⁷ Tennessee Code Annotated §49-2-1304(i)(1).

¹⁴⁸ Tennessee Code Annotated §49-2-1304(i)(2).

¹⁴⁹ Tennessee Code Annotated §49-2-1304(i)(3).

¹⁵⁰ Florida’s Request for Application for the Florida Diagnostic and Learning Resources System.

¹⁵¹ Iowa Code §273.3(3), which states that the board of directors of AEAs have the duty to “provide data and prepared reports as directed by the department of education.” Under the recommendations proposed in this report, the chief administrator of each AEA should have this duty.

- District effectiveness and efficiency in districts served resulting from technical assistance and program support;
 - Direct services provided or regionally shared services arranged by the service center which produce more economical and efficient school operations;
 - Direct services provided or regionally shared services arranged by the service center which provide for assistance in core services; and
 - Grants received for implementation of state initiatives and the results achieved by the service center under the terms of the grant contract.
- A review of school district satisfaction with services.¹⁵²

Transition AEA Boards of Directors and Local AEA Advisory Groups to Share Information Directly to Iowa Department of Education

As AEA functions are concentrated on students with disabilities and the Iowa Department of Education's capacity and mechanisms to monitor AEA and IDEA compliance improves with additional resources, **AEA board of directors do not have an oversight purpose and should be dissolved.** Additionally, **current AEA advisory groups should be retooled** to five to nine members that may include traditional public school, charter school, and non-public school personnel (e.g., school district superintendents, school leaders, teachers) and families of students receiving special education services from an AEA. Each AEA advisory group should be charged with recommending a strategic plan, tracking the progress of the AEA in meeting its performance goals, and share feedback with the AEA and Iowa Department of Education. Advisory group members should also reflect the geographic diversity of each AEA's territory. Advisory group members may be appointed by the Director of the Iowa Department of Education or by school districts.

5. Empower: Grow Iowa Department of Education Funding, Capabilities, and Infrastructure to Provide Greater Levels of Special Education and AEA Oversight

By law, the Iowa Department of Education, AEA, school districts, and other educational entities are required to comply with IDEA. The Department works with AEA to ensure compliance with IDEA Part B activities through three primary processes:

- Support of practices that improve educational outcomes for students;
- Use of multiple methods to identify and correct noncompliance within one year; and
- Mechanisms to encourage and support improvement and enforce compliance.¹⁵³

For IDEA Part C, the Department also leads the state's special education compliance and monitoring activities to ensure that the provision of services meets federal and state standards, working alongside the state's Early ACCESS Integrated System of Early Intervention Services (EA). Personnel from EA agencies (referred to as the *EA State Team*) conduct annual monitoring and compliance activities of AEA through a six-part framework of general

¹⁵² Texas Education Code §8.101.

¹⁵³ In addition, the Iowa Department of Education also conducts desk audits, accreditation visits, and internal and external stakeholder interviews to ensure that AEA activities align with and meet Comprehensive Improvement Plan standards and State Performance Plan indicators, which are developed in coordination with Iowa's Special Education Advisory Panel (SEAP). See US Department of Education (published on June 23, 2023), 2023 SPP/APR and State Determination Letters, Part B-Iowa. Available at: <https://sites.ed.gov/idea/idea-files/2023-spp-apr-and-state-determination-letters-part-b-iowa/>.

supervision, with the goal of ensuring that IDEA Part C activities are implemented according to state and federal standards. When noncompliance is observed, issues are identified, verified, and resolved.¹⁵⁴

In its FY21 State Performance Plan/Annual Performance Report for IDEA Part B and C, the Department outlined recent changes implemented throughout the state in response to actions required from performance issues and noncompliance in its FY20 Report. These changes included:

- Department-led improvements to professional development and statewide processes for Early Childhood Outcomes (ECO) data collection and use;
- Implementation of a new Individualized Family Service Plan/Individualized Education Plan (IFSP/IEP) system, ACHIEVE, with ECO processes to improve evaluation, eligibility determination, and IFSP development at the state-level; and
- Use of the ACHIEVE system to address issues of secondary transition noncompliance raised in Iowa's FY20 IDEA Part B determination report.^{155, 156}

While improvements at the Department have been made to increase statewide performance and compliance, persistent issues demonstrated through the US Department of Education's FY21 "needs assistance (for two or more consecutive years)" determination for implementing IDEA Part B and C show that **the Iowa Department of Education requires additional staffing, funding, and infrastructure to more effectively oversee the state's special education system**. Importantly, the increased funding for the Iowa Department of Education's special education oversight functions could be realized through cost savings from other report recommendations focused on concentrating AEA service offerings.

6. Transparency: Develop Clear Special Education Roles and Responsibilities for School Districts, AEAs, and the Iowa Department of Education

Clear special education related roles and responsibilities between school districts, AEAs, and the Iowa Department of Education will be critical to effectively implement this report's recommendations. Clear roles and responsibilities minimize confusion and help ensure the effective and compliant implementation of special education services.

¹⁵⁴ US Department of Education (published on June 21, 2023), 2023 SPP/APR and State Determination Letters, Part C-Iowa. Available at: <https://sites.ed.gov/idea/idea-files/2023-spp-apr-and-state-determination-letters-part-c-iowa/>.

¹⁵⁵ US Department of Education (published on June 21, 2023), 2023 SPP/APR and State Determination Letters, Part C-Iowa. Available at: HYPERLINK "https://sites.ed.gov/idea/idea-files/2023-spp-apr-and-state-determination-letters-part-c-iowa/"<https://sites.ed.gov/idea/idea-files/2023-spp-apr-and-state-determination-letters-part-c-iowa/>.

¹⁵⁶ US Department of Education (published on June 23, 2023), 2023 SPP/APR and State Determination Letters, Part B-Iowa. Available at: <https://sites.ed.gov/idea/idea-files/2023-spp-apr-and-state-determination-letters-part-b-iowa/>.

V. Conclusion

While the indicator states see relative success in special education with moderate to conservative levels of funding and expenditures, Iowa struggles to achieve baseline outcomes for their students with disabilities despite a comparatively higher level of funding for and involvement from AEAs than similar states. Iowa's school districts and their employees lack representation on AEA boards and have no oversight over the portion of district budgets that are automatically directed under state law to AEAs before funds are disbursed to districts. There is a disconnect between the systems of funding and governing special education and the quality of education delivered to students with disabilities in the great state of Iowa.

Remedying issues affecting entire education systems is complex and involves intersectional involvement from many sectors. To support necessary changes along the path of improvement and aid stakeholders as partners on the same path of achieving excellence in special education, it is imperative to build the capacity of the Iowa Department of Education and clearly define the roles of the Department, school districts, and AEAs. Upon this foundation, redistributing responsibility of special education services, allowing school districts to opt-in to utilizing AEAs, increasing state and local oversight of AEAs, and restructuring the funding of AEAs to give back key financial oversight to school districts will improve the academic outcomes of Iowa's students with disabilities.

VI. Appendix

Appendix A: Indicator States

A.1: Indicator States Overview

Table 7: Key Features of Indicator States

Key Features of Indicator States	
Florida	<ul style="list-style-type: none"> The Florida Diagnostic and Learning Resources System (FDLRS) provides special education identification and evaluation for children birth through 5. Educational Consortia serve rural school districts; they offer professional development focused on students with disabilities and also support FDLRS.
Georgia	<ul style="list-style-type: none"> The Georgia Learning Resources System (GLRS) provides training and resources to school district personnel on IDEA compliance. Regional Education Service Agencies (RESAs) can serve as the fiscal agent for full-day intensive special education programs and for GLRS but otherwise do not offer special education services.
Nebraska	<ul style="list-style-type: none"> Educational Service Units (ESUs) effectively operate as intermediary school districts; they coordinate and provide early childhood and K-22 special education services as well as physical and occupational therapy.
South Dakota	<ul style="list-style-type: none"> Cooperative Educational Service Units (CEUs) provide specialized services for students with disabilities and programs that support these students' transition to independence.
Tennessee	<ul style="list-style-type: none"> Educational Cooperatives offer special education and professional development services throughout the state. The Tennessee Department of Education may withhold funds from school districts that continue to expend funds on educational cooperatives that are not providing an adequate economic service to school districts.
Texas	<ul style="list-style-type: none"> Regional Education Service Centers (RESCs) provide special education services and professional development; they may serve as fiscal agents for shared services arrangements. The Commissioner of the Texas Department of Education can determine the number and location of RESCs, annually evaluates RESC and executive director performance, must approve the hiring and dismissal of RESC executive directors and RESC annual budgets, and closes RESCs with poor performance.

A.2: Florida

Table 8: Florida Special Education Characteristics Compared to Iowa¹⁵⁷

	Iowa	Florida
Average 2022 NAEP Score for Students with Disabilities Subgroup	215	231
Number of School Districts	327	76
Number of Enrolled Students	517,324	2,858,461
Percentage Students with Disabilities	13%	15%
Adjusted Special Education Per-Pupil Expenditure Amount	\$14,387	\$0
Adjusted General Education Base Funding Per-Pupil Amount	\$8,857	\$9,938
Number of ESAs	9 ¹⁵⁸	3 ¹⁵⁹
Name of State's ESAs	Area Education Agencies	Educational Consortia
At Least One ESA Involved in Special Education Support Services	Yes	Yes

Florida reported \$0 in special education expenditures to NCES in FY20.

Educational Service Agencies: Florida Diagnostic & Learning Resources System (FDLRS)

- **Overview:** Florida provides special education identification and evaluation through 18 regional centers called the Florida Diagnostic & Learning Resources System (FDLRS).
- **Governance:** The Florida Department of Education governs FDLRS through a Request for Application (RFA) process that each FDLRS must complete and submit to the Florida Department of Education to receive funds under IDEA. Under the RFA process, the Florida Department of Education may participate in the selection process for FDLRS leadership positions.
- **Services:** FDLRS provides “information, training, and support to families in order to promote effective parent participation in the education of children who are exceptional and/or have special needs.”¹⁶⁰ Specific services include the identification and evaluation of students with disabilities aged 3 through 21 and professional development for school personnel.
- **Funding:** FDLRS is funded by the Florida Department of Education, Division of Public Schools, Bureau of Exceptional Education and Student Services and is funded through IDEA and state funds.

¹⁵⁷ For more information about Florida's special education characteristics, see the following:

- The Nation's Report Card (accessed on September 26, 2023), Data Tools Item Maps. Available at:

<https://www.nationsreportcard.gov/itemmaps/?subj=reading&grade=4>, click on "Select Subject" drop down menu, then click on desired subject, then repeat for "Select Grade" and "Select Year."

- National Center for Education Statistics (accessed in September 2023), Elementary/Secondary Information System State Enrollment Data. Available at:

<https://nces.ed.gov/ipeds/data/elsi/tableGenerator.aspx?savedTableID=646278>.

- National Center for Education Statistics (accessed in September 2023), CCD Data Files 2019-2020, District Finance Survey (F-33). Available at:

<https://nces.ed.gov/ipeds/data/ccd/files.asp#Fiscal:1,LevelId:5,Page:1>.

¹⁵⁸ Iowa Code §273.2 authorizes the establishment of area education agencies, which are listed here: Iowa's Area Education Agencies (accessed on

September 28, 2023), About. Available at: <https://iowaaea.org/about/>.

¹⁵⁹ Florida Statutes §1001.451 authorizes the creation of educational consortia. The consortia are described here: Florida's Educational Consortia (published on October 30, 2019), Florida's Educational Consortia. Available at: https://www.paec.org/site/files/Tri%20Consortia%20Brochure%2010-30-19_rev.pdf.

¹⁶⁰ Florida Diagnostic & Learning Resources System (published on June 21, 2023), Parent and Family. Available at: <https://www.fdlrs.org/about/parent>.

Educational Service Agencies: Educational Consortia

- **Overview:** Florida has three educational service agencies, known as Educational Consortia. Membership to Educational Consortia is limited to school districts with fewer than 20,000 students.
- **Governance:** Member district superintendents sit on the Board of Directors for Educational Consortia.
- **Services:** Educational Consortia provide shared purchasing programs and offer professional development. Professional development programs may cover issues impacting students with disabilities, but Educational Consortia do not provide special education support services or instructional programs to member districts.
- **Funding:** Educational Consortia are funded through state incentive grants, allocations from member districts, and fees for services.

A.3: Georgia

Table 9: Georgia Special Education Characteristics Compared to Iowa¹⁶¹

	Iowa	Georgia
Average 2022 NAEP Score for Students with Disabilities Subgroup	215	221
Number of School Districts	327	216
Number of Enrolled Students	517,324	1,769,657
Percentage Students with Disabilities	13%	13%
Adjusted Special Education Per-Pupil Expenditure Amount	\$14,387	\$10,561
Adjusted General Education Base Funding Per-Pupil Amount	\$8,857	\$9,659
Number of ESAs	9 ¹⁶²	16 ¹⁶³
Name of State's ESAs	Area Education Agencies	Regional Education Service Agencies
At Least One ESA Involved in Special Education Support Services	Yes	No

Georgia Highlights:

- ⇒ The Georgia Learning Resources System (GLRS) provides training and resources to school district personnel on IDEA compliance and Regional Education Service Agencies (RESAs) may serve as fiscal agents for GLRS.

Educational Service Agencies: Regional Education Service Agencies (RESAs)

- **Overview:** Georgia has a system of 16 Regional Education Service Agencies (RESAs) that are established to provide shared services designed to improve the effectiveness of educational programs and serves to school districts and state charter schools and provide Georgia Learning Resources System (GLRS) services.¹⁶⁴
- **Governance:** School districts and other RESA members (e.g., higher education institutions in the region) serve on the Board of Control that determine member services needed, establish priorities based on needs, and allocate resources accordingly.¹⁶⁵ Board of Control appoints and contracts for the director of each RESA.¹⁶⁶ Each RESA annually develops and submits a plan to the Georgia Department of Education for

¹⁶¹ For more information about Georgia's special education characteristics, see the following:
 - The Nation's Report Card (accessed on September 26, 2023), Data Tools Item Maps. Available at: <https://www.nationsreportcard.gov/itemmaps/?subj=reading&grade=4>, click on "Select Subject" drop down menu, then click on desired subject, then repeat for "Select Grade" and "Select Year."
 - National Center for Education Statistics (accessed in September 2023), Elementary/Secondary Information System State Enrollment Data. Available at: <https://nces.ed.gov/ipeds/data/ipeds-table-generator.aspx?savedTableID=646278>.
 - National Center for Education Statistics (accessed in September 2023), CCD Data Files 2019-2020, District Finance Survey (F-33). Available at: <https://nces.ed.gov/ipeds/data/ipeds-table-generator.aspx?savedTableID=646278>.

¹⁶² Iowa Code §273.2 authorizes the establishment of area education agencies, which are listed here: Iowa's Area Education Agencies (accessed on September 28, 2023), About. Available at: <https://iowaaea.org/about/>.

¹⁶³ Under the Official Code of Georgia Annotated §20-2-270, the Georgia State Board of Education must establish a statewide network of regional educational service agencies. This website specifies the number of these agencies and the services they provides: Georgia Department of Education (accessed on September 28, 2023), Regional Education Service Agencies. Available at: [https://www.gadoe.org/Pages/Regional-Education-Service-Agencies-\(RESAs\).aspx](https://www.gadoe.org/Pages/Regional-Education-Service-Agencies-(RESAs).aspx).

¹⁶⁴ Official Code of Georgia Annotated §20-2-270.

¹⁶⁵ Official Code of Georgia Annotated §20-2-270.

¹⁶⁶ Official Code of Georgia Annotated §20-2-273.

approval that includes a “regional plan for improvement of educational efficiency and cost effectiveness of its member institutions.”¹⁶⁷

- **Services:** Professional development, nontraditional alternative routes to state teacher certification, GLRS implementation.¹⁶⁸
- **Funding:** RESAs are through a combination of a uniform statewide needs program grants, a documented local needs program grants, allocations from member local school systems, and fees for services provided. GLRS is funded by state IDEA discretionary funds.

¹⁶⁷ Official Code of Georgia Annotated §20-2-271(a).

¹⁶⁸ Official Code of Georgia Annotated §20-2-271.

A.4: Nebraska

Table 10: Nebraska Special Education Characteristics Compared to Iowa¹⁶⁹

	Iowa	Nebraska
Average 2022 NAEP Score for Students with Disabilities Subgroup	215	217
Number of School Districts	327	251
Number of Enrolled Students	517,324	330,018
Percentage Students with Disabilities	13%	16%
Adjusted Special Education Per-Pupil Expenditure Amount	\$14,387	\$10,991
Adjusted General Education Base Funding Per-Pupil Amount	\$8,857	\$10,189
Number of ESAs	9 ¹⁷⁰	17 ¹⁷¹
Name of State's ESAs	Area Education Agencies	Educational Service Units
At Least One ESA Involved in Special Education Support Services	Yes	Yes

Educational Service Agencies: Educational Service Units (ESUs)

- **Overview:** Nebraska's system of Educational Service Units (ESUs) resembles an intermediary school district model as ESUs have authority to levy taxes, and ESU board members stand for public election.¹⁷²
- **Governance:** Each ESU board is composed of one member from each county that is a part of the ESU and four at-large members who all reside within the geographic boundaries of the ESU (no more than two members of the at-large board members shall be appointed or elected from the same county unless any one county within the ESU has a population in excess of 150,000 inhabitants or the ESU consists of one county).¹⁷³
- **Services:** "Core Services" including shared purchasing programs, professional development, administrative services, technology support; special education provision.¹⁷⁴
- **Funding:** Funded through taxes levied by the ESUs, as well as funds from member school districts and fees for services.

¹⁶⁹ For more information about Nebraska's special education characteristics, see the following:

- The Nation's Report Card (accessed on September 26, 2023), Data Tools Item Maps. Available at:

<https://www.nationsreportcard.gov/itemmaps/?subj=reading&grade=4>, click on "Select Subject" drop down menu, then click on desired subject, then repeat for "Select Grade" and "Select Year."

- National Center for Education Statistics (accessed in September 2023), Elementary/Secondary Information System State Enrollment Data. Available at:

<https://nces.ed.gov/ipeds/data/ipeds-table-generator.aspx?savedTableID=646278>.

- National Center for Education Statistics (accessed in September 2023), CCD Data Files 2019-2020, District Finance Survey (F-33). Available at:

<https://nces.ed.gov/ipeds/data/ipeds-table-generator.aspx?savedTableID=646278>.

¹⁷⁰ Iowa Code §273.2 authorizes the establishment of area education agencies, which are listed here: Iowa's Area Education Agencies (accessed on

September 28, 2023), About. Available at: <https://iowaarea.org/about/>.

¹⁷¹ Nebraska Revised Statutes §79-1204 describes the role, mission, powers, and duties of educational service units. Further information about these entities is available here: Nebraska Department of Education (published in July 2023), Educational Service Units – School Year 2023-2024. Available at:

<https://www.education.ne.gov/wp-content/uploads/2023/07/Educational-Service-Units-23-24.pdf>.

¹⁷² Nebraska Revised Statutes §32-515.

¹⁷³ Nebraska Revised Statutes §79-1217.

¹⁷⁴ Title 92, Nebraska Administrative Code, Chapter 84, §001.

A.5: South Dakota

Table 11: South Dakota Special Education Characteristics Compared to Iowa¹⁷⁵

	Iowa	South Dakota
Average 2022 NAEP Score for Students with Disabilities Subgroup	215	219
Number of School Districts	327	150
Number of Enrolled Students	517,324	139,949
Percentage Students with Disabilities	13%	16%
Adjusted Special Education Per-Pupil Expenditure Amount	\$14,387	\$9,491
Adjusted General Education Base Funding Per-Pupil Amount	\$8,857	\$7,758
Number of ESAs	9 ¹⁷⁶	14 ¹⁷⁷
Name of State's ESAs	Area Education Agencies	Cooperative Educational Service Units
At Least One ESA Involved in Special Education Support Services	Yes	Yes

South Dakota Highlights:

- ⇒ South Dakota's local education agencies provide special education and may contract with the state's cooperative educational service units for services if needed.
- ⇒ The state also recently had educational service agencies, but that system was repealed in 2017.
- ⇒ Because school districts establish cooperative educational service units and school board members from those districts are on cooperatives' governing boards, districts have input in the system.
- ⇒ Cooperative educational service units with fee-for-services models must be responsive to the needs of districts in order for districts to choose to utilize them.

Educational Service Agencies: Cooperative Educational Service Units (CESUs)

- **Overview:** South Dakota has fourteen Cooperative Educational Service Units (CESUs).¹⁷⁸ Its cooperative system provides local control with guidance, with school districts having a say in how their cooperatives operate and what services they provide.¹⁷⁹

¹⁷⁵ For more information about South Dakota's special education characteristics, see the following:

- The Nation's Report Card (accessed on September 26, 2023), Data Tools Item Maps. Available at: <https://www.nationsreportcard.gov/itemmaps/?subj=reading&grade=4>, click on "Select Subject" drop down menu, then click on desired subject, then repeat for "Select Grade" and "Select Year."

- National Center for Education Statistics (accessed in September 2023), Elementary/Secondary Information System State Enrollment Data. Available at: <https://nces.ed.gov/ipeds/data/ipedsdatacenter/ipedsdatacenter.asp?tableID=646278>.

- National Center for Education Statistics (accessed in September 2023), CCD Data Files 2019-2020, District Finance Survey (F-33). Available at: <https://nces.ed.gov/ipeds/data/ipedsdatacenter/ipedsdatacenter.asp#Fiscal:1,LevelId:5,Page:1>.

¹⁷⁶ Iowa Code §273.2 authorizes the establishment of area education agencies, which are listed here: Iowa's Area Education Agencies (accessed on September 28, 2023), About. Available at: <https://iowaaea.org/about/>.

¹⁷⁷ South Dakota Codified Laws §§13-5-31 through 13-5-33.2 specify that cooperative educational service units are legal entities and establish requirements for these entities. A list of the state's cooperatives is available here: South Dakota Department of Education (accessed on September 29, 2023), South Dakota Educational Directory. Available at: <https://doe.sd.gov/ofm/edudir.aspx>.

¹⁷⁸ South Dakota Department of Education (accessed on September 29, 2023), South Dakota Educational Directory. Available at: <https://doe.sd.gov/ofm/edudir.aspx>.

¹⁷⁹ South Dakota Codified Laws §§13-5-31 and 13-5-32.1.

- **Governance:** The state's CESUs are established by an agreement among participating districts. They are governed by a governing board that consists of school board members, with each participating district appointing at least one school board member.¹⁸⁰
- **Services:** CESUs primarily provide special education services. Some of the cooperatives choose to provide other services in addition to special education, such as professional development, shared purchasing programs, and other programming to benefit the local community.¹⁸¹
- **Funding:** CESUs are primarily funded by their member school districts in one of two ways: (1) an annual payment by each district that is calculated based on the district's student count or (2) a flat annual fee plus payment of fees-for-services. Additional funding sources may include federal or state grants or IDEA flow-through money.

¹⁸⁰ South Dakota Codified Laws §13-5-32.1.

¹⁸¹ South Dakota statute permits cooperative educational service units to provide a variety of services as "deemed appropriate by a majority vote of the governing board and in keeping with the laws of the State of South Dakota." South Dakota Codified Laws §13-5-31. See, for example, both of the following cooperatives which provide a variety of services in addition to special education:

- Black Hills Special Services Cooperative (accessed on October 6, 2023), Black Hills Special Services Cooperative. Available at: <https://bhssc.org/>.
- Teachwell Solutions (accessed on October 6, 2023), Teachwell Solutions. Available at: <https://teachwell.org/>.

A.6: Tennessee

Table 12: Tennessee Special Education Characteristics Compared to Iowa¹⁸²

	Iowa	Tennessee
Average 2022 NAEP Score for Students with Disabilities Subgroup	215	218
Number of School Districts	327	147
Number of Enrolled Students	517,324	1,014,744
Percentage Students with Disabilities	13%	13%
Adjusted Special Education Per-Pupil Expenditure Amount	\$14,387	\$7,482
Adjusted General Education Base Funding Per-Pupil Amount	\$8,857	\$7,992
Number of ESAs	9 ¹⁸³	Unknown ¹⁸⁴
Name of State's ESAs	Area Education Agencies	Educational Cooperatives
At Least One ESA Involved in Special Education Support Services	Yes	Yes

Educational Service Agencies: Educational Cooperatives

- **Overview:** Tennessee has an unknown number of Educational Cooperatives, with at least one providing special education and related professional development.
- **Governance:** Established pursuant to an agreement among two or more boards of education, county or municipal governing bodies, or directors of school; all public agencies party to the agreement are represented on the board or through other governance agreed in contract; the Tennessee Department of Education may withhold funds from school districts that continue to expend functions on educational cooperatives that are not providing an adequate an economic service to districts
- **Services:** Special education services, professional development
- **Funding:** Funded through state and federal grants and fees for services; also funded in accordance with the bylaws of the cooperative agreement (which may include requiring contributions from member districts)

¹⁸² For more information about Tennessee's special education characteristics, see the following:

- The Nation's Report Card (accessed on September 26, 2023), Data Tools Item Maps. Available at:

<https://www.nationsreportcard.gov/itemmaps/?subj=reading&grade=4>, click on "Select Subject" drop down menu, then click on desired subject, then repeat for "Select Grade" and "Select Year."

- National Center for Education Statistics (accessed in September 2023), Elementary/Secondary Information System State Enrollment Data. Available at:

<https://nces.ed.gov/ccd/elsi/tableGenerator.aspx?savedTableID=646278>.

- National Center for Education Statistics (accessed in September 2023), CCD Data Files 2019-2020, District Finance Survey (F-33). Available at:

<https://nces.ed.gov/ccd/files.asp#Fiscal:1,LevelId:5,Page:1>.

¹⁸³ Iowa Code §273.2 authorizes the establishment of area education agencies, which are listed here: Iowa's Area Education Agencies (accessed on September 28, 2023), About. Available at: <https://iowaaea.org/about/>.

¹⁸⁴ Tennessee Code Annotated §49-2-1302 permits the establishment of the state's educational cooperatives. Additionally, Tennessee Code Annotated §49-10-116 permits LEAs or charter schools to form special education cooperatives. While at least one of these entities exists, research did not find a definitive list of all educational cooperatives or special education cooperatives in the state. As a result, the number of ESAs for Tennessee is unknown.

A.7: Texas

Table 13: Texas Special Education Characteristics Compared to Iowa¹⁸⁵

	Iowa	Texas
Average 2022 NAEP Score for Students with Disabilities Subgroup	215	222
Number of School Districts	327	1,205
Number of Enrolled Students	517,324	5,495,398
Percentage Students with Disabilities	13%	11%
Adjusted Special Education Per-Pupil Expenditure Amount	\$14,387	\$11,240
Adjusted General Education Base Funding Per-Pupil Amount	\$8,857	\$8,970
Number of ESAs	9 ¹⁸⁶	20 ¹⁸⁷
Name of State’s ESAs	Area Education Agencies	Regional Education Service Centers
At Least One ESA Involved in Special Education Support Services	Yes	Yes

Educational Service Agencies: Regional Education Service Centers (RESCs)

- **Overview:** Texas Regional Education Service Centers (RESCs) are directly overseen by the Texas Commissioner of Education who annually audits and evaluates RESC performance and school district satisfaction with services.
- **Governance:** Governed by a seven-member board of directors elected by boards of trustees of districts in each ESC region; Texas Department of Education Commissioner can determine number and locations of RESCs, must approve hiring and dismissal of RESC executive directors, annual budget, and close RESCs with poor performance; annual evaluates RESC and executive director performance
- **Services:** Professional development, shared purchasing programs, school safety resources and support, dyslexia specialist(s), printing, managed IT services
- **Funding:** Funded through state appropriations, state and federal grants, and fee for services

¹⁸⁵ For more information about Texas’s special education characteristics, see the following:

- The Nation’s Report Card (accessed on September 26, 2023), Data Tools Item Maps. Available at: <https://www.nationsreportcard.gov/itemmaps/?subj=reading&grade=4>, click on "Select Subject" drop down menu, then click on desired subject, then repeat for "Select Grade" and "Select Year."

- National Center for Education Statistics (accessed in September 2023), Elementary/Secondary Information System State Enrollment Data. Available at: <https://nces.ed.gov/ipeds/data/ipedsdatatools/ipedsdatacenter/ipedsdatacenter.asp?tableID=646278>.

- National Center for Education Statistics (accessed in September 2023), CCD Data Files 2019-2020, District Finance Survey (F-33). Available at: https://nces.ed.gov/ipeds/data/ipedsdatatools/ipedsdatacenter/ipedsdatacenter.asp#Fiscal:1_LevelId:5_Page:1.

¹⁸⁶ Iowa Code §273.2 authorizes the establishment of area education agencies, which are listed here: Iowa’s Area Education Agencies (accessed on September 28, 2023), About. Available at: <https://iowaaea.org/about/>.

¹⁸⁷ Texas Education Code §8.001 requires that the Texas Commissioner of Education provide for the establishment and operation of the state’s regional education service centers. More information about these entities is available at both of the following websites:

- Texas Education Agency (accessed on September 29, 2023), Education Service Centers. Available at: <https://tea.texas.gov/about-tea/other-services/education-service-centers>.

- Texas Association of School Boards (accessed on September 29, 2023), Education Service Centers. Available at: <https://www.tasb.org/about-tasb/related-sites-and-affiliated-entities/education-service-centers.aspx>.

Appendix B: Other Educational Services Provided by AEAs

AEAs are also required or authorized to provide a variety of educational services, including all of the following:

Table 14: Other Educational Services provided by AEAs

Category of Service	Description	Is the service required or permitted?
Gifted students ¹⁸⁸	“Encourage and assist” districts to establish programs for these services	Required
Interlibrary loans ¹⁸⁹	Assist in facilitating these loans of materials between districts and libraries	Required
In-service training programs ¹⁹⁰	Provide these programs for district and AEA employees (including “regular training concerning mental or emotional disorders which may afflict children and the impact children with such disorders have upon their families”)	Permitted to the extent funding is available
Educational data processing ¹⁹¹	Provide educational data processing that is approved, coordinated, and supervised by the Director of the Iowa Department of Education ¹⁹²	Permitted to the extent funding is available
Research, demonstration projects and models, and educational planning ¹⁹³	Provide these services for children under age 5 through 12 th grade and children requiring special education “as approved by the State Board of Education”	Permitted to the extent funding is available
Auxiliary services for nonpublic school students ¹⁹⁴	Make certain public school services available to children attending nonpublic schools ¹⁹⁵	Permitted to the extent funding is available
Other educational programs and services ¹⁹⁶	Provide these services for children under age 5 through 12 th grade and children	Permitted to the extent funding is available

¹⁸⁸ Iowa Code §273.2(4) and 281 Iowa Administrative Code §72.4(4).

¹⁸⁹ Iowa Code §273.2(4) and 281 Iowa Administrative Code §72.4(11).

¹⁹⁰ Iowa Code §273.2(5)(a).

¹⁹¹ Iowa Code §273.2(5)(b).

¹⁹² Iowa Code §256.9(11).

¹⁹³ Iowa Code §273.2(5)(c).

¹⁹⁴ Iowa Code §273.2(5)(d).

¹⁹⁵ Iowa Code §256.12(2)(a).

¹⁹⁶ Iowa Code §273.2(5)(e).

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Category of Service	Description	Is the service required or permitted?
	requiring special education and for district and AEA employees “as approved by the State Board of Education”	
Online-learning-for-Iowa-educators-professional-development project ¹⁹⁷	Offer this project to licensed teachers who want to teach coursework for the Iowa Learning Online Initiative ¹⁹⁸	Appears to be permitted
Contracted services for school districts ¹⁹⁹	Provide services under contract including superintendency services, personnel services, business management services, specialized maintenance services, and transportation services	Permitted
Online learning program ²⁰⁰	Provide such a program for secondary students	Permissive subject to appropriations
Services for school-community planning ²⁰¹	Assist schools and districts with “assessing needs of all students, developing collaborative relationships among community agencies, establishing shared direction, implementing actions to meet goals, and reporting progress towards goals”	Required
Professional development services ²⁰²	Deliver these services for schools, districts, and AEA personnel	Required
Curriculum, instruction, and assessment services ²⁰³	Deliver these services that address, at a minimum, reading, language arts, math, and science	Required
Services that support “multicultural, gender-fair approaches” to Iowa’s educational program ²⁰⁴	Provide services that assist schools and districts (1) “to take actions that ensure all students are free from” discriminatory acts and	Required

¹⁹⁷ Iowa Code §256.42(3).

¹⁹⁸ Iowa Code §256.42(3).

¹⁹⁹ Iowa Code §273.7A(1). See also 281 Iowa Administrative Code §72.4(9) with respect to management services.

²⁰⁰ Iowa Code §273.16.

²⁰¹ 281 Iowa Administrative Code §72.4(1).

²⁰² 281 Iowa Administrative Code §72.4(2). AEAs are also authorized to offer professional development and training for school administrators and teachers under Iowa Code Chapter 284.

²⁰³ 281 Iowa Administrative Code §72.4(3).

²⁰⁴ 281 Iowa Administrative Code §72.4(5).

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Category of Service	Description	Is the service required or permitted?
	practices and harassment and (2) to incorporate certain activities into the educational program and professional development related to diversity	
School technology services that supplement and support effective instruction for all students ²⁰⁵	Provide services for “technology planning, technical assistance, and professional development” that support “the incorporation of instructional technologies to improve student achievement,” “the implementation of content standards” in reading, math, and science at a minimum, and emerging technology	Required
Services that develop leadership based upon the Iowa Standards for School Administrators ²⁰⁶	Deliver these services to assist with recruitment, induction, retention, and professional development of educational leaders	Required
Program and services evaluation and reporting system ²⁰⁷	Maintain this system in accordance with requirements in administrative rules for such a system	Required
Early childhood service coordination support ²⁰⁸	Provide this support for families and children to meet health, safety, and learning needs, including support for service coordination for Iowa’s Early ACCESS system ²⁰⁹	Required

²⁰⁵ 281 Iowa Administrative Code §72.4(7).

²⁰⁶ 281 Iowa Administrative Code §72.4(8).

²⁰⁷ 281 Iowa Administrative Code §72.4(9).

²⁰⁸ 281 Iowa Administrative Code §72.4(12).

²⁰⁹ Iowa Department of Education (accessed on October 9, 2023), Early ACCESS. Available at: <https://educateiowa.gov/pk-12/early-childhood/early-access>.

Appendix C: Educational Service Agencies

For purposes of this report, an educational service agency is a regional entity that provides support services to school districts and includes entities like cooperatives and intermediate school districts. This definition also includes both public entities (those authorized in state law or established by agreements between school districts) and private entities.

The following table presents an overview of the educational service agencies (as well as the number of enrolled students and number of school districts) for all 50 states. Of the 50, 46 states have some type of educational service agency system and 28 of these were identified to have at least one of the state’s educational service agencies involved in special education support services or instruction.

Table 15: States' Educational Service Agencies' Characteristics

State	Number of Enrolled Students ²¹⁰	Number of School Districts ²¹¹	Number of ESAs Identified ²¹²	Name of State's ESAs	One or More ESAs Involved in Special Education
Iowa	517,324	327	9 ²¹³	Area Education Agencies	Yes
Alabama	744,235	142	None	N/A	N/A
Alaska	132,017	54	2 ^{214, 215}	Southeast Regional Resource Center, Special Education Service Agency	Yes
Arizona	1,152,586	666	15 ²¹⁶	County Education Service Agencies	No

²¹⁰ National Center for Education Statistics (accessed in September 2023), Elementary/Secondary Information System State Enrollment Data. Available at: <https://nces.ed.gov/ipeds/data/ipeds-table-generator.aspx?savedTableID=646278>.

²¹¹ Ibid.

²¹² For states with "none" in this column, research did not identify any ESAs, and findings are supported by two separate reports published by the Association of Educational Service Agencies:

- Association of Educational Service Agencies (published in March 2021), State by State ESA Report. Available at: https://www.waesd.org/wp-content/uploads/2021/04/AESA_ESA-State-by-State-Report-March-2021.pdf.

- Association of Educational Service Agencies (published on June 2, 2021), Educational Service Agencies: Review of Selected/Related Literature. Available at: <https://www.aesa.us/2021/06/02/educational-service-agencies-review-of-selected-related-literature/>.

²¹³ Iowa Code §273.2 authorizes the establishment of area education agencies, which are listed here: Iowa’s Area Education Agencies (accessed on September 28, 2023), About. Available at: <https://iowaaea.org/about/>.

²¹⁴ Alaska Statute 14.12.150 authorizes the establishment of regional resource centers. Research identified one of these centers, which is described here: SERRC – Alaska’s Educational Resource Center (accessed on September 27, 2023), About. Available at: <https://serrc.org/about/>.

²¹⁵ Special Education Service Agency (accessed on September 27, 2023), About Us. Available at: <https://sesa.org/about-us/>.

²¹⁶ The responsibilities of the County School Superintendents who direct county education service agencies are specified in Arizona Revised Statutes §15-302. These agencies are described here: Arizona Department of Education (accessed on September 27, 2023), County Education Service Agencies. Available at: <https://www.azed.gov/adeinfo/cesa>.

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State	Number of Enrolled Students ²¹⁰	Number of School Districts ²¹¹	Number of ESAs Identified ²¹²	Name of State's ESAs	One or More ESAs Involved in Special Education
Iowa	517,324	327	9 ²¹³	Area Education Agencies	Yes
Arkansas	96,927	263	15	Education Service Cooperatives	Yes
California	6,163,001	1,990	58	County Offices of Education	Yes
Colorado	913,223	184	21	Board of Cooperative Educational Services	Yes
Connecticut	523,690	202	6	Regional Educational Service Centers	Yes
Delaware	139,930	41	None	N/A	N/A
Florida	2,858,461	76	21	Educational Consortia, Florida Diagnostic and Learning Resources System local centers	Yes
Georgia	1,769,657	216	16	Regional Education Service Agencies	No

²¹⁷ Arkansas Code Annotated §6-13-1002 authorizes the establishment of education service cooperatives. These entities are listed here:

- Arkansas Department of Education Data Center (accessed on September 27, 2023), Arkansas K-12 Profile: 2022-2023 – Education Cooperative. Available at: <https://adedata.arkansas.gov/ARK12/coop>.

- Arkansas Rural Ed Association (accessed on September 27, 2023), Educational Cooperatives. Available at: <https://www.arkansasruraled.com/page/educational-cooperatives>.

²¹⁸ California Education Code §1262 authorizes county superintendents to provide services typically provided by ESAs. The county offices of education operated by county superintendents are listed here: California Department of Education (accessed on September 27, 2023), County Office of Education – CalEdFacts. Available at: <https://www.cde.ca.gov/schooldirectory/county-offices-of-education>.

²¹⁹ Colorado Revised Statutes §22-5-104 authorizes the establishment of boards of cooperative educational services. These boards are described at both of the following websites:

- Colorado Department of Education (accessed on September 27, 2023), Colorado District and BOCES Websites. Available at: <https://www.cde.state.co.us/districtandboceswebsites>.

- Colorado BOCES Association (accessed on September 27, 2023), Colorado BOCES Association. Available at: <https://www.coloradoboces.org/>.

²²⁰ Connecticut General Statutes §10-66a authorizes the establishments of regional educational service centers. The list of these centers is available here: RESC Alliance (accessed on September 28, 2023), About Us. Available at: <https://www.rescalliance.org/>.

²²¹ Florida Statutes §1001.451 authorizes the creation of educational consortia. The consortia are described here: Florida's Educational Consortia (published on October 30, 2019), Florida's Educational Consortia. Available at: https://www.paec.org/site/files/Tn%20Consortia%20Brochure%2010-30-19_rev.pdf.

²²² Florida Diagnostic and Learning Resources System (accessed on October 22, 2023), Find a Center. Available at: <https://www.fdlrs.org/find-a-center>.

²²³ Under the Official Code of Georgia Annotated §20-2-270, the Georgia State Board of Education must establish a statewide network of regional educational service agencies. This website specifies the number of these agencies and the services they provide: Georgia Department of Education (accessed on September 28, 2023), Regional Education Service Agencies. Available at: [https://www.gadoe.org/Pages/Regional-Education-Service-Agencies-\(RESAs\).aspx](https://www.gadoe.org/Pages/Regional-Education-Service-Agencies-(RESAs).aspx).

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State	Number of Enrolled Students ²¹⁰	Number of School Districts ²¹¹	Number of ESAs Identified ²¹²	Name of State's ESAs	One or More ESAs Involved in Special Education
Iowa	517,324	327	9 ²¹³	Area Education Agencies	Yes
Hawaii	181,088	1	Private ²²⁴	-	-
Idaho	311,096	168	Unknown ²²⁵	Cooperative Service Agencies	Unknown ²²⁶
Illinois	1,943,117	958	38 ²²⁷	Regional Offices of Education, Intermediate Service Centers (a subset of Regional Offices of Education that serves Cook County)	No
Indiana	1,051,411	401	9 ²²⁸	Education Service Centers	No ²²⁹
Kansas	497,963	290	7 ²³⁰	Education Service Centers	Yes
Kentucky	691,996	176	8 ²³¹	Educational Cooperatives ²³²	Yes

²²⁴ See, for example, Pacific Resources for Education and Learning (accessed on October 23, 2023), Home. Available at: <https://prel.org>.

²²⁵ Idaho Code Ann. §33-317 permits the creation of cooperative service agencies. While at least one of these entities exists, research did not find a definitive list of all cooperative service agencies in the state. As a result, the number of ESAs for Idaho is unknown.

²²⁶ The one cooperative service agency that research identified does not provide special education services; however, it is unclear if other cooperative service agencies in the state provide these services. Information about the one identified agency is available here: Idaho School District Council (accessed on October 1, 2023), ISDC Services. Available at: <https://www.isdc.org/resources>.

²²⁷ 105 Illinois Compiled Statutes 5/3-15.14 authorizes the creation of regional offices of education, and 105 Illinois Compiled Statutes states that the chief administrative officer of an educational service region is called the regional superintendent of schools. Both of the following websites have information about these entities:

- Illinois State Board of Education (accessed on September 28, 2023), Regional Offices of Education & Intermediate Service Centers. Available at: <https://www.isbe.net/roe>.

- Illinois Association of Regional Superintendents of Schools (accessed on September 28, 2023), Web Directory. Available at: <https://iarss.org/web-directory/>.

²²⁸ Indiana Code §20-20-1-3 permits the Indiana State Board of Education to establish education service centers. These centers are described here: Education Service Centers of Indiana (accessed on September 28, 2023), Education Service Centers. Available at: <https://escindiana.org/education-service-centers/>.

²²⁹ Education service centers are authorized to provide special education in state statute (Indiana Code §20-20-1-2(b)(2)), but none of the centers' websites indicated that they are doing so at this time.

²³⁰ Kansas Statutes Annotated 72-13,100 permits two or more school districts to enter into a school district interlocal cooperation agreement. More information about the entities that have been established through these agreements is available here: Kansas Association of Educational Service Agencies (accessed on September 28, 2023), Who We Are. Available at: <https://www.kaesa.org/about>.

²³¹ Kentucky Revised Statutes §65.220 provides the authority for the formation of educational cooperatives. Details about these cooperatives are available at both of the following websites:

- Kentucky Department of Education (accessed on September 28, 2023), Kentucky Educational Cooperatives. Available at: <https://education.ky.gov/comm/about/Pages/Kentucky-Education-and-Special-Education-Cooperatives.aspx>.

- Kentucky Association of Educational Cooperatives (accessed on September 28, 2023), Kentucky Educational Cooperatives. Available at: <https://www.kaec8.org/page/kentucky-educational-cooperatives>.

²³² In Kentucky, special education cooperatives are a division of educational cooperatives.

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State	Number of Enrolled Students ²¹⁰	Number of School Districts ²¹¹	Number of ESAs Identified ²¹²	Name of State's ESAs	One or More ESAs Involved in Special Education
Iowa	517,324	327	9 ²¹³	Area Education Agencies	Yes
Louisiana	710,439	193	1 ²³³	Special School District	Yes
Maine	180,291	228	13 ²³⁴	Education Service Centers	Yes
Maryland	909,404	25	None	N/A	N/A
Massachusetts	959,394	401	24 ²³⁵	Education Collaboratives	Yes
Michigan	1,495,925	889	56 ²³⁶	Intermediate School Districts	Yes
Minnesota	893,203	533	13 ^{237, 238}	Service Cooperatives, Intermediate School Districts ²³⁹	Yes
Mississippi	466,002	153	6 ²⁴⁰	Regional Education Service Agencies	No
Missouri	910,466	555	9 ²⁴¹	Regional Professional Development Centers	No

²³³ Louisiana Revised Statutes §17:1945 designates Louisiana's Special School District as an educational service agency. This district is described here: Louisiana Special School District (accessed on September 28, 2023), Louisiana Special School District. Available at: <https://www.ssdofla.org/>.

²³⁴ 20-A Maine Revised Statutes Chapter 123 authorizes the creation of education service centers. These centers are described here: Maine Department of Education (accessed on September 28, 2023), Contact an Education Service Center. Available at: <https://www.maine.gov/doe/schools/embrace/contact>.

²³⁵ Massachusetts General Laws ch. 40 §4E authorizes the formation of education collaboratives. Information about these collaboratives is available at both of the following websites:

- Massachusetts Department of Elementary and Secondary Education (accessed on September 28, 2023), School and District Profiles: Organization Search. Available at: <https://profiles.doe.mass.edu/search/search.aspx?leftNavId=11238v>.

- Massachusetts Organization of Educational Collaboratives (accessed on September 28, 2023), Massachusetts Organization of Educational Collaboratives. Available at: <https://moecnet.org/>.

²³⁶ Michigan Compiled Laws 380.601a specifies the powers and functions of intermediate school districts. These districts are described in greater detail here: Michigan Association of Intermediation School Administrators (accessed on September 28, 2023), Value of ISDs. Available at: <https://www.gomaisa.org/value-of-isds/>.

²³⁷ Minnesota Statutes §123A.21 authorizes the creation of service cooperatives, which are described in more detail here: The Minnesota Service Cooperatives (accessed on September 28, 2023), The Minnesota Service Cooperatives. Available at: <https://www.mnservcoop.org/>.

²³⁸ Minnesota Statutes Chapter 136D authorizes the creation of intermediate school districts.

²³⁹ Minnesota Statutes Chapter 125A appears to permit the creation of special education cooperatives, which are different entities than service cooperatives (authorized by Minnesota Statute §123A.21) and intermediate school districts (authorized by Minnesota Statutes Chapter 136D). While several websites for these entities exist, research did not find a definitive list of all special education cooperatives in the state. As a result, the number of ESAs identified for Minnesota does not include these cooperatives.

²⁴⁰ Mississippi Code Annotated §37-7-345 permits the establishment of regional education service agencies. Details about these agencies can be found here: Mississippi Regional Education Service Agencies (accessed on September 28, 2023), About MS RESAs. Available at: https://www.msresaservices.com/about_msresas.

²⁴¹ Missouri Revised Statutes §162.1180 permits any school district or districts to designate an educational service agency. This website provides more details about these agencies: Missouri Department of Elementary and Secondary Education (accessed on September 28, 2023), Regional Professional Development Centers. Available at: <https://dese.mo.gov/educator-quality/educator-development/regional-professional-development-centers>.

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State	Number of Enrolled Students ²¹⁰	Number of School Districts ²¹¹	Number of ESAs Identified ²¹²	Name of State's ESAs	One or More ESAs Involved in Special Education
Iowa	517,324	327	9 ²¹³	Area Education Agencies	Yes
Montana	149,917	402	5 ²⁴²	Regional Education Service Agencies	No
Nebraska	330,018	251	17 ²⁴³	Educational Service Units	Yes
Nevada	500,855	21	None	N/A	N/A
New Hampshire	177,351	195	Private ²⁴⁴	-	-
New Jersey	1,411,917	656	Unknown ²⁴⁵	Educational Services Commissions	Unknown
New Mexico	331,206	145	10 ²⁴⁶	Regional Education Cooperatives	Yes
New York	2,692,589	1,040	37 ²⁴⁷	Boards of Cooperative Educational Services	Yes
North Carolina	1,560,350	319	8 ²⁴⁸	Regional Education Services Alliances/Consortia	No

²⁴² 20-7-451 Montana Code Annotated permits a school district to contract with one or more school districts to form an education cooperative. More details about these cooperatives are available here: School Services of Montana (accessed on September 28, 2023), Montana's Regional Education Service Agencies. Available at: <https://www.mt-schools.org/montana-resas.html>.

²⁴³ Nebraska Revised Statutes §79-1204 describes the role, mission, powers, and duties of educational service units. Further information about these entities is available here: Nebraska Department of Education (published in July 2023), Educational Service Units – School Year 2023-2024. Available at: <https://www.education.ne.gov/wp-content/uploads/2023/07/Educational-Service-Units-23-24.pdf>.

²⁴⁴ See, for example, Regional Services and Education Center, Inc. (accessed on October 23, 2023), About RSEC. Available at: <https://rsec.org/mission-history/>.

²⁴⁵ New Jersey Revised Statutes §18A:6-52 permits the establishment of educational services commissions. Research did not confirm whether these entities currently exist. As a result, the number of ESAs for New Jersey is unknown.

²⁴⁶ New Mexico Statutes Annotated §22-2B-3 permits the New Mexico Public Education Department to authorize the existence and operation of regional education cooperatives. Both of the following websites provide more details about these cooperatives:

- New Mexico Public Education Department (accessed on September 28, 2023), REC Executive Directors Directory. Available at:

<https://webnew.ped.state.nm.us/rec-executive-directors-directory/>.

- New Mexico Regional Education Cooperatives Association (accessed on September 28, 2023), New Mexico Regional Education Cooperatives Association. Available at: <https://www.nmreca.org/>.

²⁴⁷ New York Education Law §1950 authorizes the establishment of boards of cooperative educational services, which are detailed here: New York State Education Department (accessed on September 28, 2023), BOCES. Available at: <https://data.nysed.gov/lists.php?type=boces>.

²⁴⁸ North Carolina General Statutes Annotated §115C-47 permits school districts to enter into cooperative agreements with other school districts, nonpublic schools, community groups, and nonprofit organizations. These agreements form the state's regional education services alliance/consortia. More information about these entities is available here: North Carolina Department of Public Instruction (accessed on October 2, 2023), RESA, RALC, & Regional Accountability Offices. Available at: <https://www.dpi.nc.gov/about-dpi/education-directory/resa-ralc-regional-accountability-offices>.

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State	Number of Enrolled Students ²¹⁰	Number of School Districts ²¹¹	Number of ESAs Identified ²¹²	Name of State's ESAs	One or More ESAs Involved in Special Education
Iowa	517,324	327	9 ²¹³	Area Education Agencies	Yes
North Dakota	116,185	175	7 ²⁴⁹	Regional Education Associations	No
Ohio	1,689,867	933	51 ²⁵⁰	Educational Service Centers	Yes
Oklahoma	703,719	544	Unknown ²⁵¹	Interlocal Cooperatives	Yes
Oregon	610,649	202	19 ²⁵²	Education Service Districts	Yes
Pennsylvania	1,732,449	697	29 ²⁵³	Intermediate Units	Yes
Rhode Island	143,557	61	Unknown ²⁵⁴	Educational Collaboratives	Yes ²⁵⁵
South Carolina	786,879	86	6 ²⁵⁶	Regional Consortia	No

²⁴⁹ North Dakota Century Code Chapter 15.1-09.1 permits the establishment of regional education associations. More details about these associations are available at both of the following websites:

- North Dakota Department of Public Instruction (accessed on September 29, 2023), Supporting and Strengthening Education in North Dakota. Available at: <https://www.nd.gov/dpi/news/supporting-and-strengthening-education-north-dakota>.

- North Dakota Regional Education Association (accessed on September 29, 2023), Home. Available at: <https://www.ndrea.org/>.

²⁵⁰ Ohio Revised Code §3311.05 establishes the territory of each educational service center in Ohio. These centers are explained in greater detail here: Ohio ESC Association (accessed on September 28, 2023), Ohio's 51 ESCs. Available at: <https://www.oesca.org/vnews/display.v/SEC/ESCs>.

²⁵¹ Oklahoma Statutes §70.5.117b permits the creation of interlocal cooperatives. Research did not find a definitive list of all interlocal cooperatives in the state. As a result, the number of interlocal cooperatives for Oklahoma is unknown.

²⁵² Oregon Revised Statutes §334.010 creates education service districts in the state. These websites include more information about these districts:

- Oregon Department of Education (accessed on September 29, 2023), Oregon Education Service Districts (ESD). Available at:

<https://www.oregon.gov/ode/about-us/documents/oregon%20esd%20map.pdf>.

- Oregon Association of Education Service Districts (accessed on September 29, 2023), Executive Summary. Available at:

<https://www.oaesd.org/about/executive-summary/>.

²⁵³ 22 Pennsylvania Code Chapter 17 establishes Pennsylvania's intermediate units. Both of the following websites have more details about these units:

- Pennsylvania Department of Education (accessed on September 29, 2023), Types of Schools. Available at:

<https://www.education.pa.gov/Schools/TypesofSchools/Pages/default.aspx>.

- Pennsylvania Association of Intermediate Units (accessed on September 29, 2023), Pennsylvania Intermediate Units: Education Solutions for Students, Schools & Communities. Available at: https://paiu.org/resources/Documents/PAIU_Brochure.pdf.

²⁵⁴ 16 Rhode Island General Laws §16-3.1-2 permits the establishment of the state's educational collaboratives. While multiple collaboratives are established in 16 Rhode Island General Laws Chapter 16-3.1, it could not be confirmed whether all of these entities currently exist. As a result, the number of ESAs in Rhode Island cannot be determined.

²⁵⁵ West Bay Collaborative (accessed on October 1, 2023), Alternative Learning Programs. Available at: <https://westbaycollaborative.org/alternative-learning-programs/>.

²⁵⁶ According to the Association of Educational Service Agencies, South Carolina's regional consortia are "established and funded by groups of school districts." Association of Educational Service Agencies (published in March 2021), State by State ESA Report. Available at: https://www.waesd.org/wp-content/uploads/2021/04/AESA_ESA-State-by-State-Report-March-2021.pdf. Research did not find any provision in the South Carolina Code of Laws that specifically permits school districts to enter agreements to form these consortia, but six of these entities are listed on the South Carolina Department of Education website. South Carolina Department of Education (accessed on October 2, 2023), Getting Started with Shared Services. Available at: <https://ed.sc.gov/districts-schools/shared-services/getting-started-with-shared-services/>.

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State	Number of Enrolled Students ²¹⁰	Number of School Districts ²¹¹	Number of ESAs Identified ²¹²	Name of State's ESAs	One or More ESAs Involved in Special Education
Iowa	517,324	327	9 ²¹³	Area Education Agencies	Yes
South Dakota	139,949	150	14 ²⁵⁷	Cooperative Educational Service Units	Yes
Tennessee	1,014,744	147	Unknown ²⁵⁸	Educational Cooperatives	Yes ²⁵⁹
Texas	5,495,398	1,205	20 ²⁶⁰	Regional Education Service Centers	Yes
Utah	684,694	154	4 ²⁶¹	Regional Service Centers	No
Vermont	87,125	118	Private ²⁶²	-	-
Virginia	1,297,012	134	4 ²⁶³	Public Education Consortia	No
Washington	1,142,073	318	9 ²⁶⁴	Educational Service Districts	Yes
West Virginia	263,486	55	Unknown ²⁶⁵	Educational Service Cooperatives	Unknown ²⁶⁶

²⁵⁷ South Dakota Codified Laws §§13-5-31 through 13-5-33.2 specify that cooperative educational service units are legal entities and establish requirements for these entities. A list of the state's cooperatives is available here: South Dakota Department of Education (accessed on September 29, 2023), South Dakota Educational Directory. Available at: <https://doe.sd.gov/ofm/edudir.aspx>.

²⁵⁸ Tennessee Code Annotated §49-2-1302 permits the establishment of the state's educational cooperatives. Additionally, Tennessee Code Annotated §49-10-116 permits LEAs or charter schools to form special education cooperatives. While at least one of these entities exists, research did not find a definitive list of all educational cooperatives or special education cooperatives in the state. As a result, the number of ESAs for Tennessee is unknown.

²⁵⁹ Little Tennessee Valley Educational Cooperative (accessed on October 1, 2023), Home. Available at: <http://www.ltvec.org/>.

²⁶⁰ Texas Education Code §8.001 requires that the Texas Commissioner of Education provide for the establishment and operation of the state's regional education service centers. More information about these entities is available at both of the following websites:

- Texas Education Agency (accessed on September 29, 2023), Education Service Centers. Available at: <https://tea.texas.gov/about-tea/other-services/education-service-centers>.

- Texas Association of School Boards (accessed on September 29, 2023), Education Service Centers. Available at: <https://www.tasb.org/about-tasb/related-sites-and-affiliated-entities/education-service-centers.aspx>.

²⁶¹ Utah Code §53G-4-410 permits the establishment of regional education service agencies. More details about these entities are available here: Utah Education Network (accessed on September 29, 2023), Regional Service Centers. Available at: <https://www.uen.org/institutions/schools?did=1108>.

²⁶² See, for example, Vermont Learning Collaborative (accessed on October 23, 2023), Home. Available at: <https://vvlc.org>.

²⁶³ Virginia Code Annotated Title 22.1, Chapters 20, 20.1, 20.2, and 22.

²⁶⁴ Chapter 28A.310 of the Revised Code of Washington establishes the state's educational service districts. These entities are explained in greater detail at both of these websites:

- Washington Office of Superintendent of Public Instruction (accessed on September 29, 2023), Educational Service Districts (ESD). Available at: <https://ospi.k12.wa.us/about-ospi/about-school-districts/educational-service-districts>.

- Association of Educational Service Districts (accessed on September 29, 2023), Our Educational Service Districts. Available at: <https://www.waesd.org/about-us/esds/>.

²⁶⁵ West Virginia Code §18-5-13c authorizes the establishment of educational service cooperatives. While at least one of these entities exists, research did not find a definitive list of all educational cooperatives in the state. As a result, the number of ESAs for West Virginia is unknown.

²⁶⁶ West Virginia Code §18-5-13c permits educational service cooperatives to provide special education services, but it is unclear if any are doing so.

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State	Number of Enrolled Students ²¹⁰	Number of School Districts ²¹¹	Number of ESAs Identified ²¹²	Name of State's ESAs	One or More ESAs Involved in Special Education
Iowa	517,324	327	9 ²¹³	Area Education Agencies	Yes
Wisconsin	855,400	445	12 ²⁶⁷	Cooperative Educational Service Agencies	Yes
Wyoming	94,616	59	16 ²⁶⁸	Boards of Cooperative Educational Services	Yes

²⁶⁷ Wisconsin Statutes Chapter 116 establishes cooperative educational service agencies. More details about these agencies are available here: Wisconsin Department of Public Instruction (accessed on September 28, 2023), Cooperative Educational Service Agency (CESA). Available at: <https://dpi.wi.gov/cesa>.

²⁶⁸ Wyoming Statutes Annotated §21-20-104 permits the establishment of boards of cooperative educational services, which are described in greater detail here: Wyoming Department of Education (accessed on September 28, 2023), Cooperative Educational Programs. Available at: <https://edu.wyoming.gov/for-district-leadership/cooperativeeducationalprograms/>.

Appendix D: Iowa IDEA Compliance Report for FY21

By law, the Iowa Department of Education, AEAs, school districts, and other educational entities are required to comply with the Individuals with Disabilities Education Act (IDEA). IDEA provides a compliance report for each fiscal year to show how the state is performing in the implementation of IDEA Parts B and C.

For IDEA Part B, AEAs are required to provide special education programs and services to school districts in their respective service areas.²⁶⁹ For IDEA Part C, AEAs must provide service coordination for Iowa's Early ACCESS system, which provides early intervention services.^{270, 271} AEAs also play an active role in the state's special education compliance and monitoring activities, led by the Iowa Department of Education, to ensure that the provision of services meets federal and state standards.

According to the 2021-2022 IDEA Annual Performance Report (released in June 2023), the Iowa Department of Education works with AEAs to ensure compliance with IDEA Part B activities through three primary processes:

- Supporting practices that improve educational outcomes for students;
- Use of multiple methods to identify and correct noncompliance within one year; and
- Mechanisms to encourage and support improvement and enforce compliance.²⁷²

Iowa established the Early ACCESS Integrated System of Early Intervention Services (EA) to implement IDEA Part C throughout the state. EA is made up of Iowa's Department of Education (acting in the role of Lead Agency) and three Signatory Agencies: Iowa's Department of Public Health, the Iowa Department of Human Services, and University of Iowa Child Health Specialty Clinics. Under this implementation framework, AEAs are designated as "Regional Grantees," charged with the provision of Child Find, early intervention services, service coordination, transition, personnel development, special education services and support. Personnel from EA agencies (referred to as the *EA State Team*) conduct annual monitoring and compliance activities of AEAs through a six-part framework of general supervision, with the goal of ensuring that IDEA Part C activities are implemented according to state and federal standards, and when noncompliance is observed, issues are identified, verified, and resolved.²⁷³

As Regional Grantees for IDEA Part C and related responsibilities under IDEA Part B, AEAs have contributed to Iowa's noncompliance with federal IDEA indicators, as demonstrated in the FY21 State Performance Plan (SPP) and Annual Performance Report (APR) determinations. Generally, AEAs were involved and flagged in issues related to delays in identification and implementation of support services for infants and toddlers, as well as delays in transition services from early childhood to school-age children in the state.

²⁶⁹ Iowa Code §273.5.

²⁷⁰ Iowa Department of Education (accessed on October 9, 2023), Early ACCESS. Available at: <https://educateiowa.gov/pk-12/early-childhood/early-access>.

²⁷¹ 281 Iowa Administrative Code 72.4(12).

²⁷² In addition, the Iowa Department of Education also conducts desk audits, accreditation visits, and internal and external stakeholder interviews to ensure that AEA activities align with and meet Comprehensive Improvement Plan standards and State Performance Plan indicators, which are developed in coordination with Iowa's Special Education Advisory Panel (SEAP). See US Department of Education (published on June 23, 2023), 2023 SPP/APR and State Determination Letters, Part B-Iowa. Available at: <https://sites.ed.gov/idea/idea-files/2023-spp-apr-and-state-determination-letters-part-b-iowa/>.

²⁷³ US Department of Education (published on June 21, 2023), 2023 SPP/APR and State Determination Letters, Part C-Iowa. Available at: <https://sites.ed.gov/idea/idea-files/2023-spp-apr-and-state-determination-letters-part-c-iowa/>.

D.1: IDEA Part B Compliance

Table 16: Instances of Missed Targets Involving AEAs in IDEA Part B Compliance for FY21 (2023 Report)

IDEA Part B Compliance for FY21 (2023 Report)		
Indicator and Description	Status and Data	AEA Involvement/Reasoning
<p>11. Child Find: % of children evaluated within 60 days of parental consent for initial evaluation or state time frame.</p>	<p>Target not met; no slippage. Target: 100% Reported Data: 96.5% Baseline: 87.31% (2005)</p>	<p>AEAs were responsible, alongside the State, for monitoring and reviewing real-time IEP/evaluation data, including 60-day evaluation window compliance. State found 453 delays FY21, 153 for no valid reason. 399 noncompliance cases in FY20. FY21 data showed less than 100% of students were evaluated in the 60-day window. The State conducted on-site data reviews with AEAs in FY20 and directed the use of verification reports for monitoring.</p>
<p>12. Early Childhood Transition: % of children found Part B eligible with IEP implemented by 3rd birthday.</p>	<p>Target not met; no slippage. Target: 100% Reported Data: 98.38% Baseline: 99.83 (2005)</p>	<p>AEAs were responsible for developing and implementing an IEP by a child's third birthday. State found noncompliance was rare and did not have a root-cause trend; 20 delays in FY21, 18 for no valid reason. The State conducted on-site data reviews in FY20 and reviewed all children served under IDEA Part C referred to Part B were evaluated and, if eligible, received an IEP. AEAs were also directed to utilize verification reports that alert them of upcoming transition requirements.</p>

D.2: IDEA Part C Compliance

Table 17: Instances of Missed Targets Involving AEAs in IDEA Part C Compliance for FY21 (2023 Report)

IDEA Part C Compliance for FY21 (2023 Report)		
Indicator and Description	Status and Data	AEA Involvement/Reasoning
<p>1. Individual Family Service Plans: # of infants and toddlers with IFSPs who receive the early intervention services on their IFSPs in a timely manner.</p>	<p>Target not met, no slippage. Target: 100% Reported Data: 99.85% Baseline: 100% (2005)</p>	<p>3 AEAs found noncompliant in FY20; in FY21 71 delays attributed to family cancellations, AEA staff schedules, agency closure for holidays, and staff illness. State notified AEAs of noncompliance, AEAs corrected within the 365 day timeline for correction after analyzing root causes and obtaining additional data review from the State.</p>
<p>3. Early Childhood Outcomes: % of infants and toddlers with IFSPs who demonstrate: A1 and A2. Positive social-emotional skills (including social relationships); B1 and B2. Acquisition and use of knowledge and skills (including early language/communication); and C1 and C2. Use of appropriate behaviors to meet their needs.</p>	<p>A1 (% substantially increased rate of growth by age 3/exit): Target: 46.29% Reported Data: 46.83% Baseline: 46.29% (2018) Met target, no slippage.</p> <p>A2 (% functioning within age expectations by age 3/exit): Target not met, slippage. Target: 59.67% Reported Data: 51.68% Baseline: 59.67% (2018)</p> <p>AEAs are not explicitly attributed for noncompliance with Indicators 3B and 3C</p>	<p>A2: Slippage attributed to interrupted and inconsistent early intervention service delivery as a result of the pandemic. Analysis of data for functioning within age expectations only showed 1 of 9 AEAs met the target percentage. AEAs shared need for Early Childhood Outcome (ECO) training for staff as for slippage and need for training/support for caregiver coaching and guided routine-based interventions. State convened to review and address ECO processes, utilizing OSEP-funded resources to ensure ECO PD occurs in all AEAs; new IFSP/IEP system used to support processes. State will continue data verification reports, TA, and support and monitoring of corrective action plans.</p>

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IDEA Part C Compliance for FY21 (2023 Report)		
Indicator and Description	Status and Data	AEA Involvement/Reasoning
<p>7: 45-Day Timeline: % of eligible infants and toddlers with IFSPs for whom an initial evaluation and initial assessment and IFSP meeting were conducted within 45 days.</p>	<p>Target not met; no slippage. Target: 100% Reported Data: 99.11% Baseline: 87% (2005)</p>	<p>5 AEAs found noncompliant in FY20 (14 cases), 27 cases of delay documented in FY21. AEAs required to analyze root causes and correct each case of noncompliance, with verification from the State (exceptional family circumstances identified as reason for documented delays). State verifies compliance through individual record reviews and documentation; follow-up review of data from the legacy and new IFSP/IEP system (ACHIEVE) for each AEA.</p>
<p>8: Early Childhood Transition: % of toddlers with disabilities exiting Part C with timely transition planning that the state has: A: Developed IFSP transition between 90 days and 9 months prior to age 3; B: Notified SEA and LEA 90 days before age 3 of potential Part B eligibility; C: Conducted transition conference with family between 90 days and 9 months regarding potential Part B eligible services</p>	<p>A: Target not met, no slippage Reported Data: 98.66% Baseline: 87% (2005) B: Target met, no slippage C: Target not met, no slippage Reported Data: 99.12% Baseline: 87% (2005) Target is 100% for A, B, C</p>	<p>A: 3 AEAs found noncompliant in FY20 (11 cases); State verified correction through individual record reviews and documentation. 66 delays recorded in FY21 attributed to AEA staff illness, leave of absence, difficulty with schedules. C: 2 AEAs found noncompliant in FY20 (4 cases); State verified corrections with quality assurance and monitoring consultants; follow-up review of 5 IFSPs after corrective activities and TA conducted. 37 delays recorded in FY21 attributed to staff schedules, agency closure for holidays, and staff illness.</p>

Appendix E: Academics

E.1: Iowa Statewide Assessment of Student Progress

Iowa students take the Iowa Statewide Assessment of Student Progress (ISASP) annually for English language arts and math to measure student proficiency on Iowa Academic Standards in grades 3rd – 11th.²⁷⁴ Students with disabilities can receive a range of accommodations, including, but not limited to:

- Braille pages or a braille writer;
- Extra test time;
- Sign language interpreter;
- Paper and pencil test instead of an electronic test;
- Scribes; and
- Speech-to-text assistive technology.²⁷⁵

Each student's proficiency of subject matter is measured on a scale score particular to their school grade. Proficiency rates are reported on a grade and/or student group basis.

Fifteen school districts did not report a proficiency rate for students with disabilities in 2023 due to having less than 10 students with disabilities in English language arts or math:

Table 18: School Districts that Did Not Report Proficiency Rate(s) of Students with Disabilities in 2023

English Language Arts and Math		English Language Arts
<ul style="list-style-type: none"> • Albert City-Truesdale • Alden • Bennett • Clay Central-Everyly • Diagonal • Gilmore City-Bradgate • Laurens-Marathon 	<ul style="list-style-type: none"> • LuVerne • Morning Sun • Olin Consolidated • Schleswig • Stratford • Twin Rivers 	<ul style="list-style-type: none"> • Charter Oak-Ute • Seymour

Sections E.1.1 and E.1.2 contain distributions of students with disabilities' 2023 ISASP proficiency rates grouped at the district level, as well as the proficiency rate gap between all students of a district and the students with disabilities of said district, respectively. Most districts have a less-than-50% proficiency rate for students with disabilities and larger-than-35-percentage point gaps between students with disabilities and all students.²⁷⁶

²⁷⁴ Iowa Statewide Assessment of Student Progress (accessed on September 27, 2023), Overview of Assessment. Available at: https://iowa.pearsonaccess.com/resources/bulletins/ISASP_OverviewOfAssessment.pdf.

²⁷⁵ Iowa Statewide Assessment of Student Progress (accessed on October 12, 2023), Accessibility and Accommodations Manual. Available at: https://iowa.pearsonaccess.com/resources/manuals/IA1141784_ISASP_AccomsMan_23_WEB.pdf.

²⁷⁶ Iowa Department of Education Iowa Statewide Assessment of Student Progress Spring 2023 Data.

E.1.1: English Language Arts

Figure 17: Students with Disabilities' 2023 ISASP English Language Arts Proficiency Rates

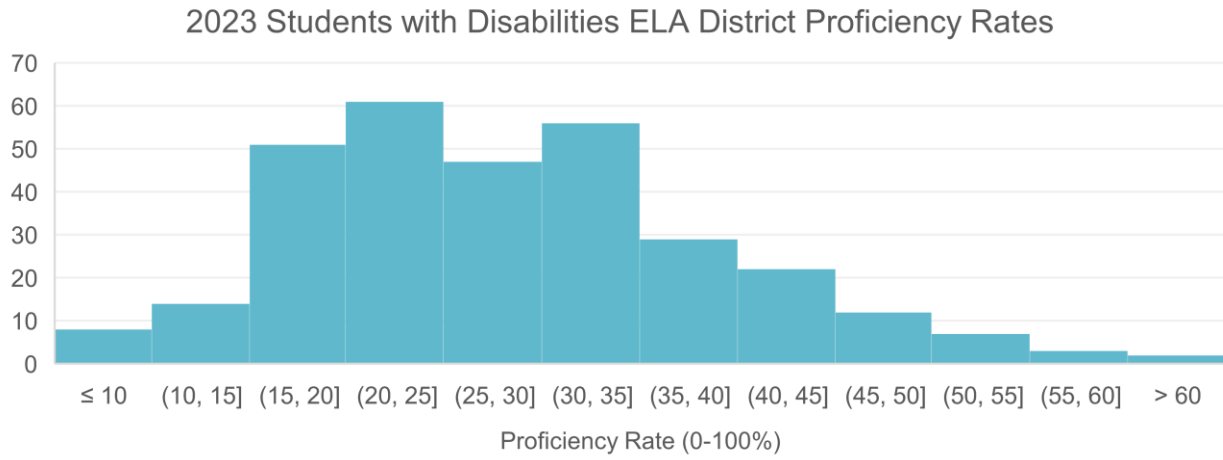
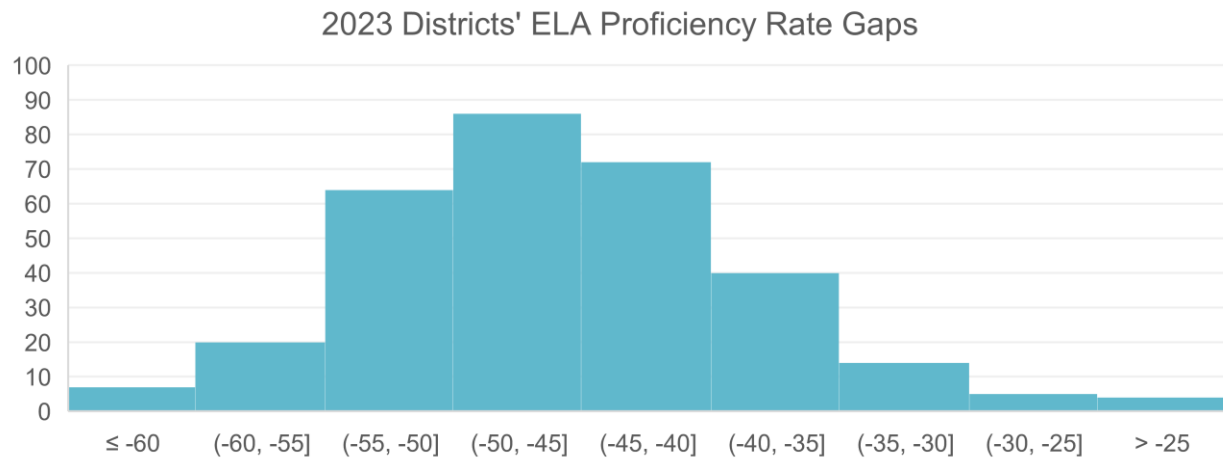


Figure 18: 2023 ISASP English Language Arts Proficiency Rate Gaps



E.1.2: Math

Figure 19: Students with Disabilities' 2023 ISASP Math Proficiency Rates

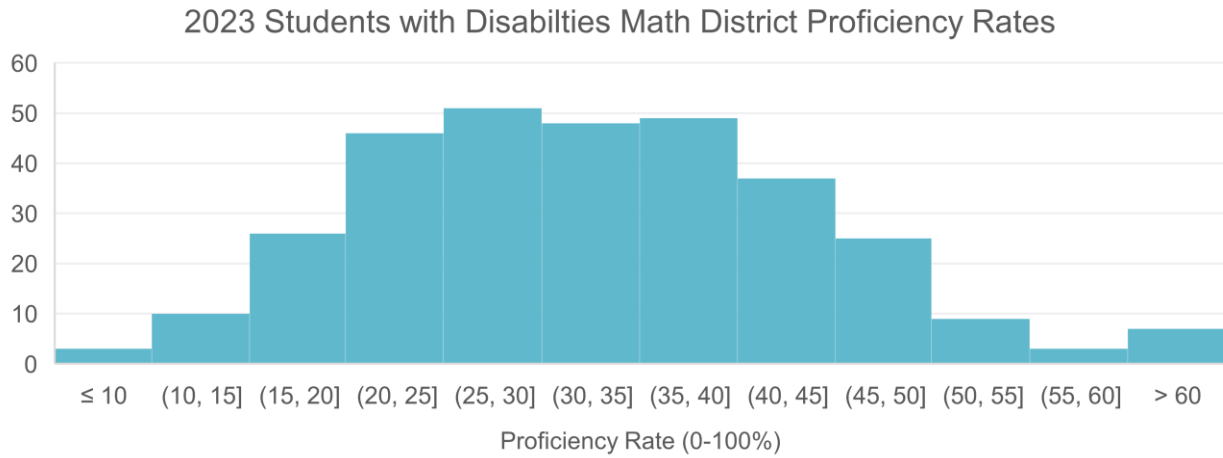
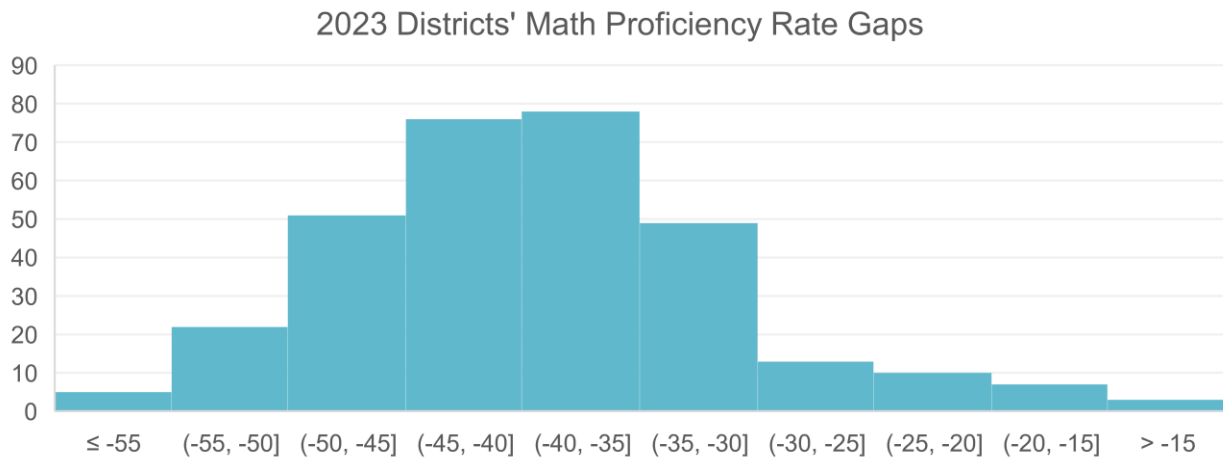


Figure 20: 2023 ISASP Math Proficiency Rate Gaps



E.1.3: Other States' Annual Assessments**Table 19: Statewide Assessments**

State	Statewide Assessment	Description
Iowa	Iowa Statewide Assessment of Student Progress	Tests students' abilities against the Iowa Core Standards focusing on student growth, proficiency, and readiness indicators. ²⁷⁷
Florida	Florida Assessment of Student Thinking ²⁷⁸	Tests students three times a year against the Benchmarks of Excellent Thinking to monitor progress. ²⁷⁹
Georgia	Georgia Milestones Assessment System	Tests students' learning of subject matter and skills against Georgia's content standards. ²⁸⁰
Nebraska	Nebraska Student-Centered Assessment System ²⁸¹	Tests students two to three times during the school year against state standards and to measure growth. ²⁸²
South Dakota	South Dakota Assessments	Tests students for understanding and mastery of subject matter and against state standards. ²⁸³

²⁷⁷ Iowa Statewide Assessment of Student Progress (accessed in October 2023), Home. Available at: <https://iowa.pearsonaccess.com/resources>.

²⁷⁸ Florida Department of Education changed their assessment tests from the Florida Standards Assessments to the Florida Assessment of Student Thinking for the 2022-2023 school year.

²⁷⁹ Florida Department of Education (accessed in October 2023), FAST Assessments. Available at: <https://www.fldoe.org/accountability/assessments/k-12-student-assessment/best/>.

²⁸⁰ Georgia Department of Education (accessed in October 2023), Georgia Milestones Assessment System. Available at: <https://www.gadoe.org/Curriculum-Instruction-and-Assessment/Assessment/Pages/Georgia-Milestones-Assessment-System.aspx>.

²⁸¹ Nebraska Department of Education changed their assessment to the Nebraska Student-Centered Assessment System Growth test for the 2022-2023 school year combining aspects of the MAP Growth and General Summative test.

²⁸² Nebraska Department of Education (accessed in October 2023), NSCAS Growth. Available at: <https://www.education.ne.gov/assessment/nscas-growth/>.

²⁸³ South Dakota Department of Education (accessed in October 2023), South Dakota Math and English-Language Arts Assessments. Available at: <https://doe.sd.gov/assessment/SD-assessments.aspx>.

E.2: National Assessment of Educational Progress

The National Assessment of Educational Progress (NAEP) is a national assessment that measures proficiency in a variety of topics, including reading and math. The NAEP assessment is conducted in a statistically significant randomized sample of schools and students across the nation, representing the breadth of districts throughout each state. NAEP assessments are conducted every two years with students in 4th, 8th, and 12th grades participating in the testing process with an additional non-testing year during the COVID-19 pandemic. Results from NAEP assessments are reported at the national and state levels, aggregating student-level results based on demographic groupings. NAEP scores range from 0 to 500 points.²⁸⁴

E.2.1: Historical NAEP Scores (2003-2022) for Iowa and Indicator States

Table 20: Historical NAEP Scores from 2003-2022²⁸⁵

	2003	2005	2007	2009	2011	2013	2015	2017	2019	2022
Iowa	217	217	219	216	218	216	217	214	210	215
National Average	218	221	223	223	222	222	221	220	218	216
Indicator States Average	219	221	226	224	223	223	224	223	222	221
Florida	214	225	224	232	229	234	231	236	233	231
Georgia	209	219	225	218	220	221	222	219	220	221
Nebraska	224	224	225	224	224	224	226	224	220	217
South Dakota	224	225	227	229	225	220	222	220	219	219
Tennessee	216	207	224	215	213	214	218	216	219	218
Texas	224	226	228	224	228	223	222	224	223	222

E.2.2 Three-Year Average Scores

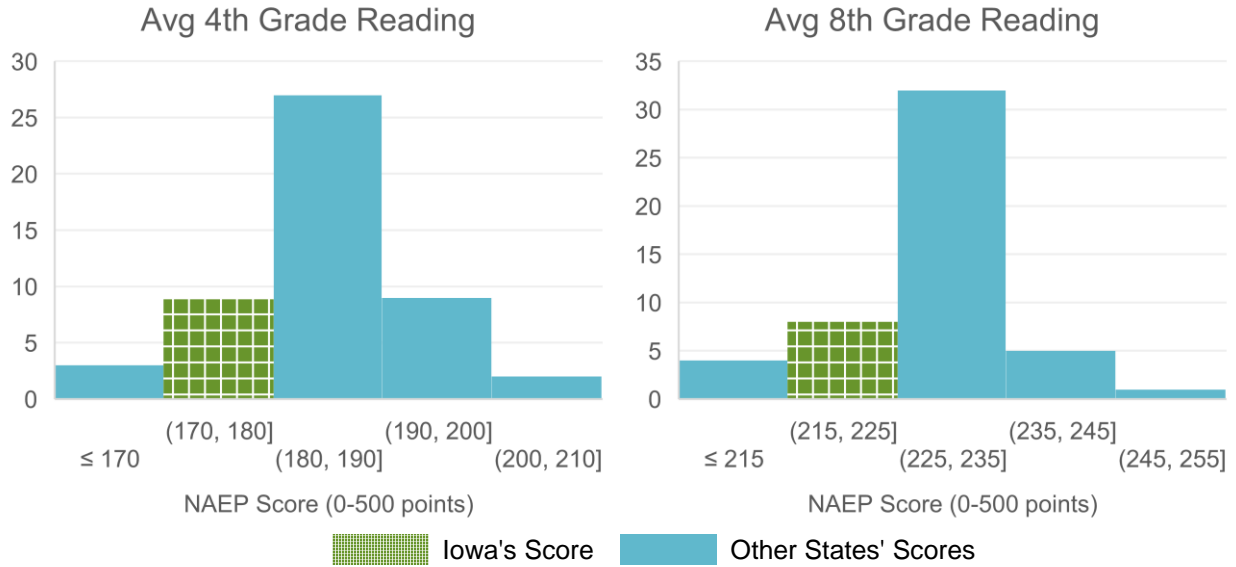
Iowa's students with disabilities have three-year average reading scores of 175.8 for the 4th grade and 224.8 for 8th grade, both below the national average (184 and 229, respectively). See Figure 21.

²⁸⁴ The Nation's Report Card (accessed on September 26, 2023), Data Tools Item Maps. Available at: <https://www.nationsreportcard.gov/itemmaps/?subj=reading&grade=4>, click on "Select Subject" drop down menu, then click on desired subject, then repeat for "Select Grade" and "Select Year."

²⁸⁵ US Department of Education. Institute of Education Sciences, National Center for Education Statistics, National Assessment of Educational Progress (NAEP), 2003, 2005, 2007, 2009, 2011, 2013, 2015, 2017, 2019, and 2022 Reading and Math Assessments. Available at: <https://www.nationsreportcard.gov/itemmaps/?subj=reading&grade=4>.

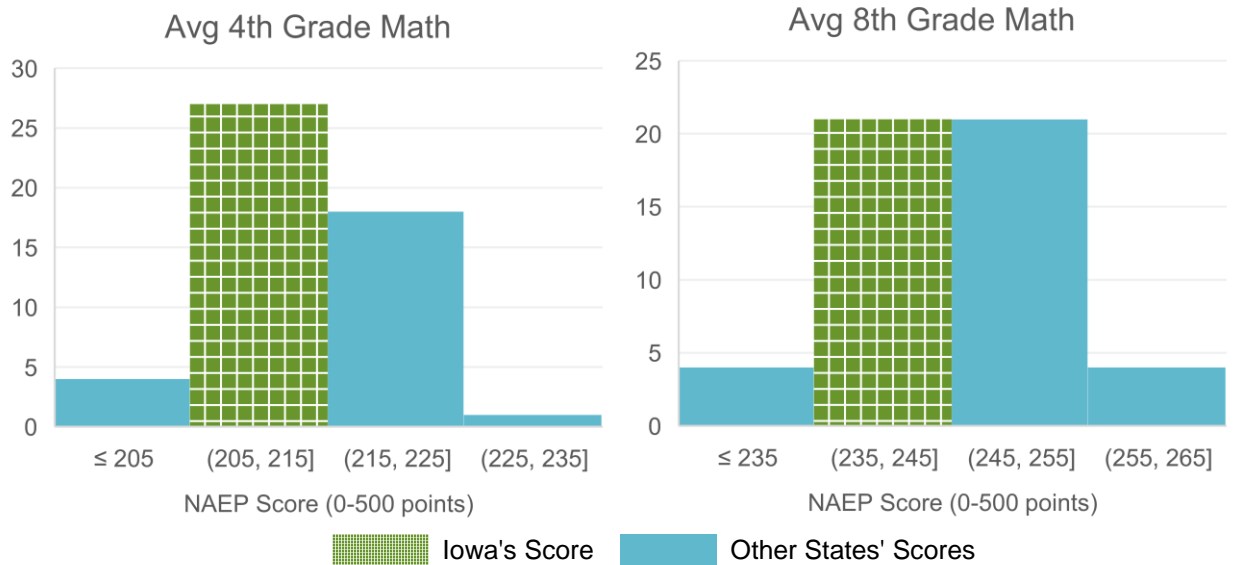
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Figure 21: Average 4th Grade and 8th Grade Reading across 2017, 2019, and 2022 ²⁸⁶



Iowa's students with disabilities have three-year average math scores of 207.7 for the 4th grade and 243.9 for 8th grade, both below the national average (213 and 245 respectively). See Figure 22.

Figure 22: Average 4th Grade and 8th Grade Math across 2017, 2019, and 2022 ²⁸⁷



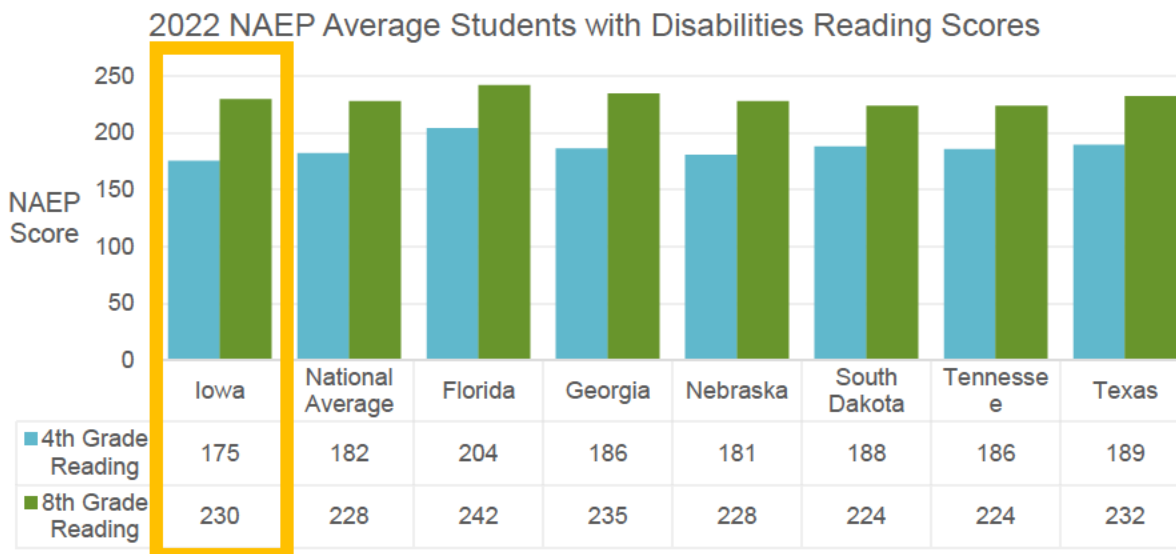
²⁸⁶ bid. 2017, 2019, and 2022 Reading Assessments.

²⁸⁷ bid., 2017, 2019, and 2022 Math Assessments.

E.2.3: Indicator States Comparison

In 2022, Iowa scored a lower reading score for students with disabilities in 4th grade (175) than the national average (182) and all six of the indicator states, and a lower reading score in 8th grade (230) than half of the indicator states (Florida at 242, Georgia at 235, and Texas at 232). The national average and all states shown in Figure 23 miss the NAEP minimum threshold for Basic mastery of 208 points for 4th grade and 243 points for 8th grade.

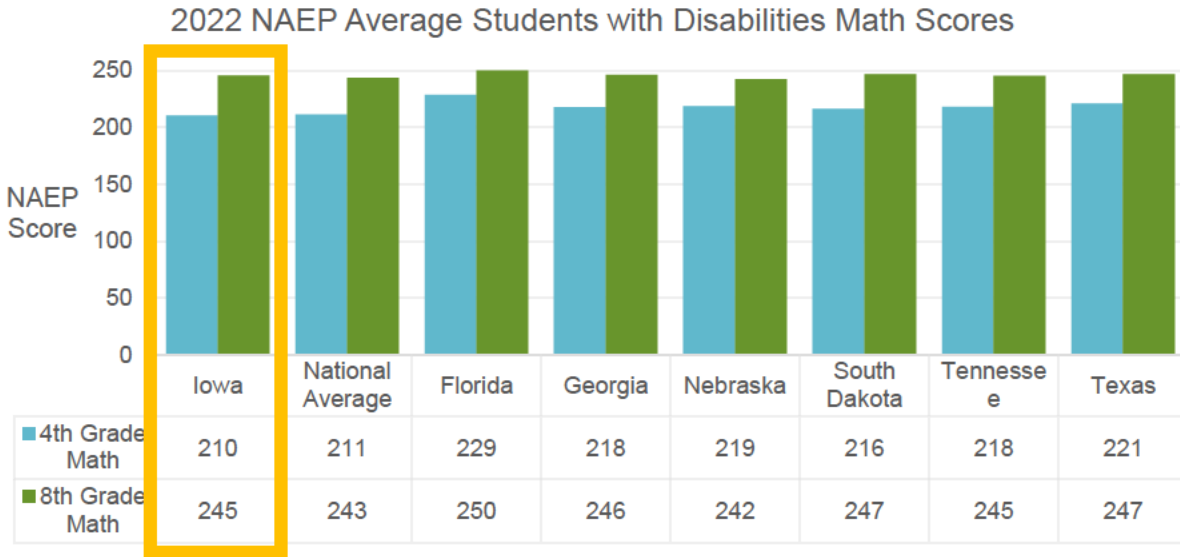
Figure 23: 2022 NAEP Average Students with Disabilities Reading Scores ²⁸⁸



Iowa also performed worse in their 2022 students with disabilities math assessment scores than their reading scores, with 4th grade math (210) scoring lower than the national average as well as all six indicator states and 8th grade math (245) scoring lower than over half of the indicator states (Florida at 250, Georgia at 246, South Dakota at 247, and Texas at 247). Iowa failed to meet the NAEP minimum threshold of Basic mastery for 4th grade math (214), but all six indicator states scored above that threshold. Iowa's students with disabilities, along with the national average and the six indicator states, failed to meet the NAEP minimum threshold for Basic 8th grade math mastery (262). See Figure 24.

²⁸⁸ bid., 2022 Reading Assessment.

Figure 24: 2022 NAEP Average Students with Disabilities Math Scores ²⁸⁹

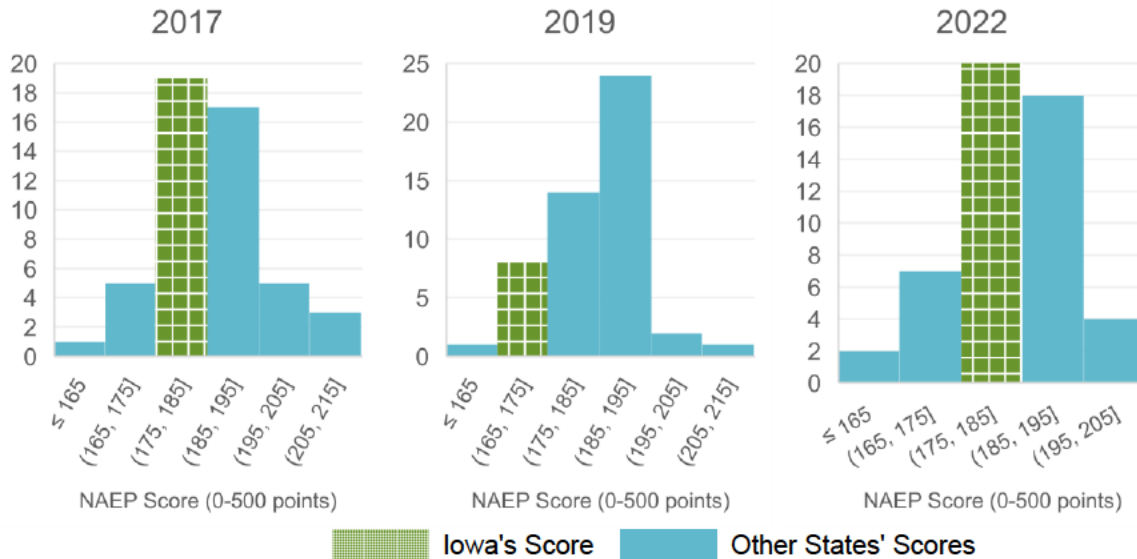


E.2.4: Reading Scores by State

E.2.4.1: 4th Grade Students with Disabilities Reading Scores

Iowa's students with disabilities have 4th grade reading scores of 178.5 in 2017, 173.9 in 2019, and 175.1 in 2022. See Figure 25.

Figure 25: 2017, 2019, and 2022 NAEP 4th Grade Reading Scores of Students with Disabilities ²⁹⁰



²⁸⁹ bid., 2022 Math Assessment.

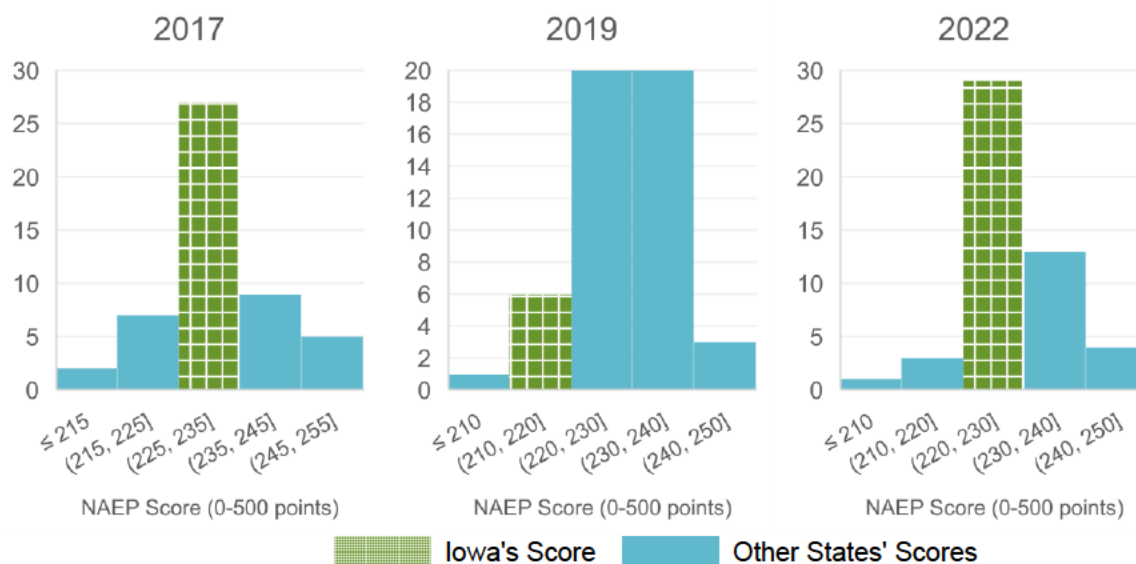
²⁹⁰ bid., 2017, 2019, and 2022 Reading Assessments.

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E.2.4.2: 8th Grade Students with Disabilities Reading Scores

Iowa's students with disabilities had 8th grade reading scores of 225.7 in 2017, 219.1 in 2019, and 229.7 in 2022. See Figure 26.

Figure 26: 2017, 2019, and 2022 NAEP 8th Grade Reading Scores of Students with Disabilities ²⁹¹



E.2.4.3: Reading NAEP Scores by Year and State

Table 21: 2017 Reading NAEP Scores

2017 Reading NAEP Scores				
State	4 th Grade All Students	4 th Grade Students with Disabilities	8 th Grade All Students	8 th Grade Students with Disabilities
Iowa	222 (rank: 24th)	178 (rank: 40th)	268 (rank: 17th)	226 (rank: 40th)
Alabama	216 (rank: 39 th)	175 (rank: 45 th)	258 (rank: 46 th)	217 (rank: 47 th)
Alaska	207 (rank: 50 th)	164 (rank: 50 th)	258 (rank: 46 th)	227 (rank: 39 th)
Arizona	215 (rank: 42 nd)	186 (rank: 23 rd)	263 (rank: 34 th)	233 (rank: 20 th)
Arkansas	216 (rank: 39 th)	172 (rank: 46 th)	260 (rank: 41 st)	219 (rank: 45 th)
California	215 (rank: 42 nd)	182 (rank: 32 nd)	263 (rank: 34 th)	231 (rank: 25 th)
Colorado	225 (rank: 10 th)	184 (rank: 27 th)	270 (rank: 8 th)	239 (rank: 7 th)
Connecticut	228 (rank: 4 th)	194 (rank: 9 th)	273 (rank: 4 th)	248 (rank: 2 nd)
Delaware	221 (rank: 29 th)	186 (rank: 23 rd)	263 (rank: 34 th)	229 (rank: 37 th)
Florida	228 (rank: 4 th)	209 (rank: 2 nd)	267 (rank: 20 th)	246 (rank: 3 rd)
Georgia	220 (rank: 31 st)	177 (rank: 42 nd)	266 (rank: 26 th)	235 (rank: 13 th)
Hawaii	216 (rank: 39 th)	168 (rank: 49 th)	261 (rank: 39 th)	214 (rank: 49 th)

²⁹¹ bid., 2017, 2019, and 2022 Reading Assessments.

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2017 Reading NAEP Scores				
State	4 th Grade All Students	4 th Grade Students with Disabilities	8 th Grade All Students	8 th Grade Students with Disabilities
Iowa	222 (rank: 24th)	178 (rank: 40th)	268 (rank: 17th)	226 (rank: 40th)
Idaho	223 (rank: 19 th)	176 (rank: 44 th)	270 (rank: 8 th)	233 (rank: 20 th)
Illinois	220 (rank: 31 st)	184 (rank: 27 th)	267 (rank: 20 th)	234 (rank: 15 th)
Indiana	226 (rank: 8 th)	195 (rank: 8 th)	272 (rank: 6 th)	241 (rank: 6 th)
Kansas	223 (rank: 19 th)	183 (rank: 30 th)	267 (rank: 20 th)	223 (rank: 44 th)
Kentucky	224 (rank: 16 th)	196 (rank: 4 th)	265 (rank: 30 th)	231 (rank: 25 th)
Louisiana	212 (rank: 48 th)	181 (rank: 35 th)	257 (rank: 48 th)	230 (rank: 32 nd)
Maine	221 (rank: 29 th)	184 (rank: 27 th)	269 (rank: 11 th)	238 (rank: 9 th)
Maryland	225 (rank: 10 th)	191 (rank: 12 th)	267 (rank: 20 th)	235 (rank: 13 th)
Massachusetts	236 (rank: 1 st)	212 (rank: 1 st)	278 (rank: 1 st)	252 (rank: 1 st)
Michigan	218 (rank: 35 th)	177 (rank: 42 nd)	265 (rank: 30 th)	232 (rank: 22 nd)
Minnesota	225 (rank: 10 th)	196 (rank: 4 th)	269 (rank: 11 th)	231 (rank: 25 th)
Mississippi	215 (rank: 42 nd)	183 (rank: 30 th)	256 (rank: 49 th)	219 (rank: 45 th)
Missouri	223 (rank: 19 th)	188 (rank: 20 th)	266 (rank: 26 th)	231 (rank: 25 th)
Montana	222 (rank: 24 th)	178 (rank: 40 th)	267 (rank: 20 th)	231 (rank: 25 th)
Nebraska	224 (rank: 16 th)	191 (rank: 12 th)	269 (rank: 11 th)	234 (rank: 15 th)
Nevada	215 (rank: 42 nd)	182 (rank: 32 nd)	260 (rank: 41 st)	225 (rank: 42 nd)
New Hampshire	229 (rank: 3 rd)	196 (rank: 4 th)	275 (rank: 2 nd)	245 (rank: 5 th)
New Jersey	233 (rank: 2 nd)	205 (rank: 3 rd)	275 (rank: 2 nd)	246 (rank: 3 rd)
New Mexico	208 (rank: 49 th)	170 (rank: 47 th)	256 (rank: 49 th)	230 (rank: 32 nd)
New York	222 (rank: 24 th)	192 (rank: 11 th)	264 (rank: 33 rd)	239 (rank: 7 th)
North Carolina	224 (rank: 16 th)	189 (rank: 17 th)	263 (rank: 34 th)	226 (rank: 40 th)
North Dakota	222 (rank: 24 th)	180 (rank: 37 th)	265 (rank: 30 th)	230 (rank: 32 nd)
Ohio	225 (rank: 10 th)	189 (rank: 17 th)	268 (rank: 17 th)	234 (rank: 15 th)
Oklahoma	217 (rank: 37 th)	181 (rank: 35 th)	261 (rank: 39 th)	230 (rank: 32 nd)
Oregon	218 (rank: 35 th)	187 (rank: 21 st)	266 (rank: 26 th)	234 (rank: 15 th)
Pennsylvania	225 (rank: 10 th)	196 (rank: 4 th)	270 (rank: 8 th)	237 (rank: 11 th)
Rhode Island	223 (rank: 19 th)	182 (rank: 32 nd)	266 (rank: 26 th)	232 (rank: 22 nd)
South Carolina	213 (rank: 47 th)	169 (rank: 48 th)	260 (rank: 41 st)	213 (rank: 50 th)
South Dakota	222 (rank: 24 th)	189 (rank: 17 th)	267 (rank: 20 th)	230 (rank: 32 nd)
Tennessee	219 (rank: 34 th)	185 (rank: 25 th)	262 (rank: 38 th)	224 (rank: 43 rd)
Texas	215 (rank: 42 nd)	191 (rank: 12 th)	260 (rank: 41 st)	231 (rank: 25 th)
Utah	225 (rank: 10 th)	190 (rank: 16 th)	269 (rank: 11 th)	229 (rank: 37 th)
Vermont	226 (rank: 8 th)	180 (rank: 37 th)	273 (rank: 4 th)	236 (rank: 12 th)
Virginia	228 (rank: 4 th)	194 (rank: 9 th)	268 (rank: 17 th)	234 (rank: 15 th)
Washington	223 (rank: 19 th)	187 (rank: 21 st)	272 (rank: 6 th)	238 (rank: 9 th)
West Virginia	217 (rank: 37 th)	185 (rank: 25 th)	259 (rank: 45 th)	216 (rank: 48 th)
Wisconsin	220 (rank: 31 st)	180 (rank: 37 th)	269 (rank: 11 th)	232 (rank: 22 nd)

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2017 Reading NAEP Scores				
State	4 th Grade All Students	4 th Grade Students with Disabilities	8 th Grade All Students	8 th Grade Students with Disabilities
Iowa	222 (rank: 24 th)	178 (rank: 40 th)	268 (rank: 17 th)	226 (rank: 40 th)
Wyoming	227 (rank: 7 th)	191 (rank: 12 th)	269 (rank: 11 th)	231 (rank: 25 th)

Table 22: 2019 Reading NAEP Scores

2019 Reading NAEP Scores				
State	4 th Grade All Students	4 th Grade Students with Disabilities	8 th Grade All Students	8 th Grade Students with Disabilities
Iowa	221 (rank: 19 th)	174 (rank: 43 rd)	262 (rank: 30 th)	219 (rank: 44 th)
Alabama	212 (rank: 47 th)	166 (rank: 49 th)	253 (rank: 48 th)	210 (rank: 50 th)
Alaska	204 (rank: 50 th)	161 (rank: 50 th)	252 (rank: 49 th)	226 (rank: 30 th)
Arizona	216 (rank: 39 th)	189 (rank: 16 th)	259 (rank: 37 th)	226 (rank: 30 th)
Arkansas	215 (rank: 45 th)	174 (rank: 43 rd)	259 (rank: 37 th)	223 (rank: 38 th)
California	216 (rank: 39 th)	182 (rank: 33 rd)	259 (rank: 37 th)	231 (rank: 21 st)
Colorado	225 (rank: 4 th)	190 (rank: 13 th)	267 (rank: 6 th)	236 (rank: 8 th)
Connecticut	224 (rank: 7 th)	187 (rank: 18 th)	270 (rank: 2 nd)	240 (rank: 3 rd)
Delaware	218 (rank: 31 st)	179 (rank: 36 th)	260 (rank: 36 th)	222 (rank: 40 th)
Florida	225 (rank: 4 th)	202 (rank: 2 nd)	263 (rank: 22 nd)	242 (rank: 2 nd)
Georgia	218 (rank: 31 st)	184 (rank: 29 th)	262 (rank: 30 th)	235 (rank: 10 th)
Hawaii	218 (rank: 31 st)	169 (rank: 48 th)	258 (rank: 41 st)	212 (rank: 48 th)
Idaho	223 (rank: 10 th)	173 (rank: 45 th)	266 (rank: 10 th)	219 (rank: 44 th)
Illinois	218 (rank: 31 st)	179 (rank: 36 th)	265 (rank: 13 th)	232 (rank: 14 th)
Indiana	222 (rank: 12 th)	187 (rank: 18 th)	266 (rank: 10 th)	232 (rank: 14 th)
Kansas	219 (rank: 28 th)	177 (rank: 40 th)	263 (rank: 22 nd)	225 (rank: 34 th)
Kentucky	221 (rank: 19 th)	192 (rank: 6 th)	263 (rank: 22 nd)	229 (rank: 25 th)
Louisiana	210 (rank: 48 th)	180 (rank: 35 th)	257 (rank: 44 th)	227 (rank: 27 th)
Maine	221 (rank: 19 th)	186 (rank: 23 rd)	265 (rank: 13 th)	232 (rank: 14 th)
Maryland	220 (rank: 24 th)	192 (rank: 6 th)	264 (rank: 17 th)	235 (rank: 10 th)
Massachusetts	231 (rank: 1 st)	208 (rank: 1 st)	273 (rank: 1 st)	245 (rank: 1 st)
Michigan	218 (rank: 31 st)	185 (rank: 28 th)	263 (rank: 22 nd)	226 (rank: 30 th)
Minnesota	222 (rank: 12 th)	190 (rank: 13 th)	264 (rank: 17 th)	230 (rank: 23 rd)
Mississippi	219 (rank: 28 th)	193 (rank: 4 th)	256 (rank: 45 th)	220 (rank: 43 rd)
Missouri	218 (rank: 31 st)	176 (rank: 41 st)	263 (rank: 22 nd)	225 (rank: 34 th)
Montana	222 (rank: 12 th)	184 (rank: 29 th)	265 (rank: 13 th)	230 (rank: 23 rd)
Nebraska	222 (rank: 12 th)	186 (rank: 23 rd)	264 (rank: 17 th)	224 (rank: 37 th)
Nevada	218 (rank: 31 st)	182 (rank: 33 rd)	258 (rank: 41 st)	221 (rank: 41 st)
New Hampshire	224 (rank: 7 th)	191 (rank: 10 th)	268 (rank: 4 th)	238 (rank: 4 th)
New Jersey	227 (rank: 2 nd)	199 (rank: 3 rd)	270 (rank: 2 nd)	238 (rank: 4 th)

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2019 Reading NAEP Scores				
State	4 th Grade All Students	4 th Grade Students with Disabilities	8 th Grade All Students	8 th Grade Students with Disabilities
Iowa	221 (rank: 19th)	174 (rank: 43rd)	262 (rank: 30th)	219 (rank: 44th)
New Mexico	208 (rank: 49 th)	172 (rank: 46 th)	252 (rank: 49 th)	219 (rank: 44 th)
New York	220 (rank: 24 th)	186 (rank: 23 rd)	262 (rank: 30 th)	237 (rank: 6 th)
North Carolina	221 (rank: 19 th)	183 (rank: 31 st)	263 (rank: 22 nd)	232 (rank: 14 th)
North Dakota	221 (rank: 19 th)	187 (rank: 18 th)	263 (rank: 22 nd)	223 (rank: 38 th)
Ohio	222 (rank: 12 th)	186 (rank: 23 rd)	267 (rank: 6 th)	235 (rank: 10 th)
Oklahoma	216 (rank: 39 th)	189 (rank: 16 th)	258 (rank: 41 st)	227 (rank: 27 th)
Oregon	218 (rank: 31 st)	191 (rank: 10 th)	264 (rank: 17 th)	232 (rank: 14 th)
Pennsylvania	223 (rank: 10 th)	190 (rank: 13 th)	264 (rank: 17 th)	231 (rank: 21 st)
Rhode Island	220 (rank: 24 th)	183 (rank: 31 st)	262 (rank: 30 th)	235 (rank: 10 th)
South Carolina	216 (rank: 39 th)	175 (rank: 42 nd)	259 (rank: 37 th)	219 (rank: 44 th)
South Dakota	222 (rank: 12 th)	191 (rank: 10 th)	263 (rank: 22 nd)	221 (rank: 41 st)
Tennessee	219 (rank: 28 th)	187 (rank: 18 th)	262 (rank: 30 th)	225 (rank: 34 th)
Texas	216 (rank: 39 th)	186 (rank: 23 rd)	256 (rank: 45 th)	228 (rank: 26 th)
Utah	225 (rank: 4 th)	192 (rank: 6 th)	267 (rank: 6 th)	237 (rank: 6 th)
Vermont	222 (rank: 12 th)	178 (rank: 39 th)	268 (rank: 4 th)	232 (rank: 14 th)
Virginia	224 (rank: 7 th)	192 (rank: 6 th)	262 (rank: 30 th)	227 (rank: 27 th)
Washington	220 (rank: 24 th)	187 (rank: 18 th)	266 (rank: 10 th)	236 (rank: 8 th)
West Virginia	213 (rank: 46 th)	171 (rank: 47 th)	256 (rank: 45 th)	212 (rank: 48 th)
Wisconsin	220 (rank: 24 th)	179 (rank: 36 th)	267 (rank: 6 th)	226 (rank: 30 th)
Wyoming	227 (rank: 2 nd)	193 (rank: 4 th)	265 (rank: 13 th)	232 (rank: 14 th)

Table 23: 2022 Reading NAEP Scores

2022 Reading NAEP Scores				
State	4 th Grade All Students	4 th Grade Students with Disabilities	8 th Grade All Students	8 th Grade Students with Disabilities
Iowa	218 (rank: 14th)	175 (rank: 41st)	260 (rank: 18th)	230 (rank: 16th)
Alabama	213 (rank: 37 th)	179 (rank: 33 rd)	251 (rank: 47 th)	214 (rank: 47 th)
Alaska	204 (rank: 49 th)	166 (rank: 48 th)	253 (rank: 44 th)	229 (rank: 19 th)
Arizona	215 (rank: 28 th)	187 (rank: 15 th)	259 (rank: 23 rd)	225 (rank: 33 rd)
Arkansas	212 (rank: 40 th)	174 (rank: 43 rd)	255 (rank: 41 st)	227 (rank: 27 th)
California	214 (rank: 32 nd)	188 (rank: 12 th)	259 (rank: 23 rd)	235 (rank: 6 th)
Colorado	223 (rank: 4 th)	195 (rank: 3 rd)	263 (rank: 7 th)	227 (rank: 27 th)
Connecticut	219 (rank: 8 th)	187 (rank: 15 th)	264 (rank: 4 th)	241 (rank: 4 th)
Delaware	208 (rank: 46 th)	177 (rank: 39 th)	253 (rank: 44 th)	228 (rank: 24 th)
Florida	225 (rank: 2 nd)	204 (rank: 1 st)	260 (rank: 18 th)	242 (rank: 3 rd)
Georgia	216 (rank: 25 th)	186 (rank: 19 th)	260 (rank: 18 th)	235 (rank: 6 th)

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2022 Reading NAEP Scores				
State	4 th Grade All Students	4 th Grade Students with Disabilities	8 th Grade All Students	8 th Grade Students with Disabilities
Iowa	218 (rank: 14th)	175 (rank: 41st)	260 (rank: 18th)	230 (rank: 16th)
Hawaii	219 (rank: 8 th)	166 (rank: 48 th)	259 (rank: 23 rd)	212 (rank: 49 th)
Idaho	215 (rank: 28 th)	163 (rank: 50 th)	264 (rank: 4 th)	226 (rank: 32 nd)
Illinois	218 (rank: 14 th)	186 (rank: 19 th)	262 (rank: 9 th)	227 (rank: 27 th)
Indiana	217 (rank: 18 th)	188 (rank: 12 th)	261 (rank: 15 th)	228 (rank: 24 th)
Kansas	215 (rank: 28 th)	180 (rank: 29 th)	256 (rank: 39 th)	221 (rank: 45 th)
Kentucky	217 (rank: 18 th)	190 (rank: 7 th)	258 (rank: 32 nd)	224 (rank: 37 th)
Louisiana	212 (rank: 40 th)	178 (rank: 35 th)	257 (rank: 36 th)	231 (rank: 14 th)
Maine	213 (rank: 37 th)	176 (rank: 40 th)	257 (rank: 36 th)	223 (rank: 42 nd)
Maryland	212 (rank: 40 th)	187 (rank: 15 th)	259 (rank: 23 rd)	232 (rank: 10 th)
Massachusetts	227 (rank: 1 st)	196 (rank: 2 nd)	269 (rank: 2 nd)	245 (rank: 1 st)
Michigan	212 (rank: 40 th)	178 (rank: 35 th)	259 (rank: 23 rd)	223 (rank: 42 nd)
Minnesota	215 (rank: 28 th)	189 (rank: 8 th)	260 (rank: 18 th)	232 (rank: 10 th)
Mississippi	217 (rank: 18 th)	189 (rank: 8 th)	253 (rank: 44 th)	224 (rank: 37 th)
Missouri	213 (rank: 37 th)	171 (rank: 45 th)	258 (rank: 32 nd)	229 (rank: 19 th)
Montana	219 (rank: 8 th)	179 (rank: 33 rd)	261 (rank: 15 th)	231 (rank: 14 th)
Nebraska	219 (rank: 8 th)	181 (rank: 26 th)	259 (rank: 23 rd)	228 (rank: 24 th)
Nevada	212 (rank: 40 th)	180 (rank: 29 th)	259 (rank: 23 rd)	227 (rank: 27 th)
New Hampshire	223 (rank: 4 th)	186 (rank: 19 th)	263 (rank: 7 th)	234 (rank: 9 th)
New Jersey	223 (rank: 4 th)	192 (rank: 5 th)	270 (rank: 1 st)	243 (rank: 2 nd)
New Mexico	202 (rank: 50 th)	167 (rank: 47 th)	248 (rank: 50 th)	223 (rank: 42 nd)
New York	214 (rank: 32 nd)	180 (rank: 29 th)	262 (rank: 9 th)	237 (rank: 5 th)
North Carolina	216 (rank: 25 th)	180 (rank: 29 th)	256 (rank: 39 th)	225 (rank: 33 rd)
North Dakota	218 (rank: 14 th)	178 (rank: 35 th)	258 (rank: 32 nd)	225 (rank: 33 rd)
Ohio	219 (rank: 8 th)	178 (rank: 35 th)	262 (rank: 9 th)	229 (rank: 19 th)
Oklahoma	208 (rank: 46 th)	175 (rank: 41 st)	251 (rank: 47 th)	221 (rank: 45 th)
Oregon	210 (rank: 45 th)	182 (rank: 24 th)	257 (rank: 36 th)	227 (rank: 27 th)
Pennsylvania	219 (rank: 8 th)	187 (rank: 15 th)	259 (rank: 23 rd)	229 (rank: 19 th)
Rhode Island	217 (rank: 18 th)	181 (rank: 26 th)	259 (rank: 23 rd)	230 (rank: 16 th)
South Carolina	216 (rank: 25 th)	182 (rank: 24 th)	254 (rank: 43 rd)	214 (rank: 47 th)
South Dakota	218 (rank: 14 th)	188 (rank: 12 th)	262 (rank: 9 th)	224 (rank: 37 th)
Tennessee	214 (rank: 32 nd)	186 (rank: 19 th)	258 (rank: 32 nd)	224 (rank: 37 th)
Texas	214 (rank: 32 nd)	189 (rank: 8 th)	255 (rank: 41 st)	232 (rank: 10 th)
Utah	221 (rank: 7 th)	192 (rank: 5 th)	265 (rank: 3 rd)	235 (rank: 6 th)
Vermont	217 (rank: 18 th)	172 (rank: 44 th)	264 (rank: 4 th)	229 (rank: 19 th)
Virginia	214 (rank: 32 nd)	181 (rank: 26 th)	260 (rank: 18 th)	232 (rank: 10 th)
Washington	217 (rank: 18 th)	195 (rank: 3 rd)	262 (rank: 9 th)	230 (rank: 16 th)
West Virginia	205 (rank: 48 th)	168 (rank: 46 th)	249 (rank: 49 th)	208 (rank: 50 th)

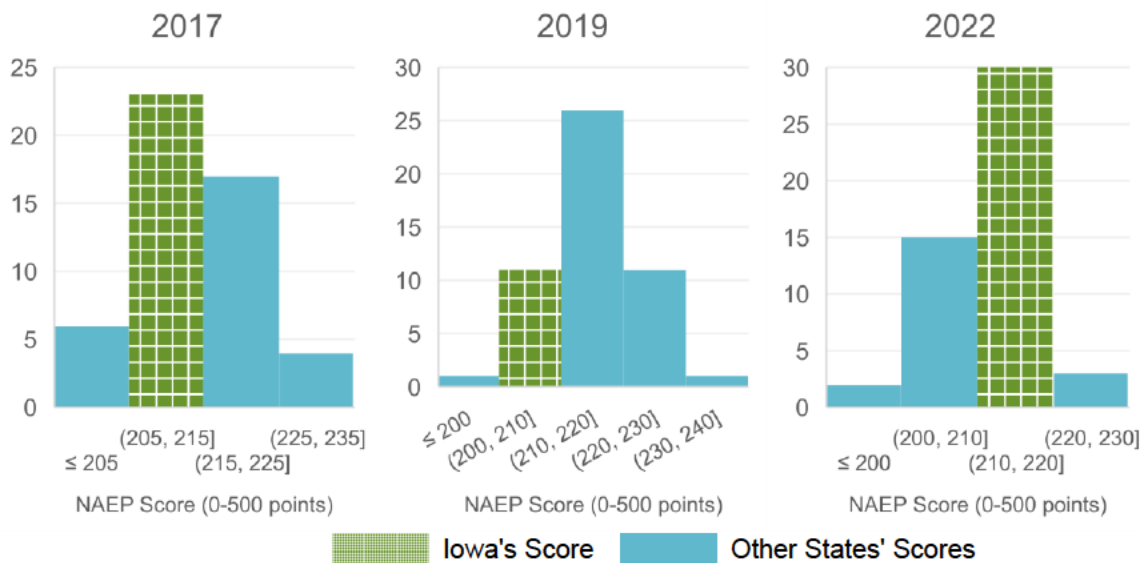
2022 Reading NAEP Scores				
State	4 th Grade All Students	4 th Grade Students with Disabilities	8 th Grade All Students	8 th Grade Students with Disabilities
Iowa	218 (rank: 14 th)	175 (rank: 41 st)	260 (rank: 18 th)	230 (rank: 16 th)
Wisconsin	217 (rank: 18 th)	183 (rank: 23 rd)	262 (rank: 9 th)	224 (rank: 37 th)
Wyoming	225 (rank: 2 nd)	189 (rank: 8 th)	261 (rank: 15 th)	225 (rank: 33 rd)

E.2.5: Math Scores by State

E.2.5.1: 4th Grade Students with Disabilities Math Scores

Iowa's students with disabilities have 4th grade math scores of 210.2 in 2017, 202.8 in 2019, and 210.2 in 2022. See Figure 27.

Figure 27: 2017, 2019, and 2022 NAEP 4th Grade Math Scores of Students with Disabilities²⁹²



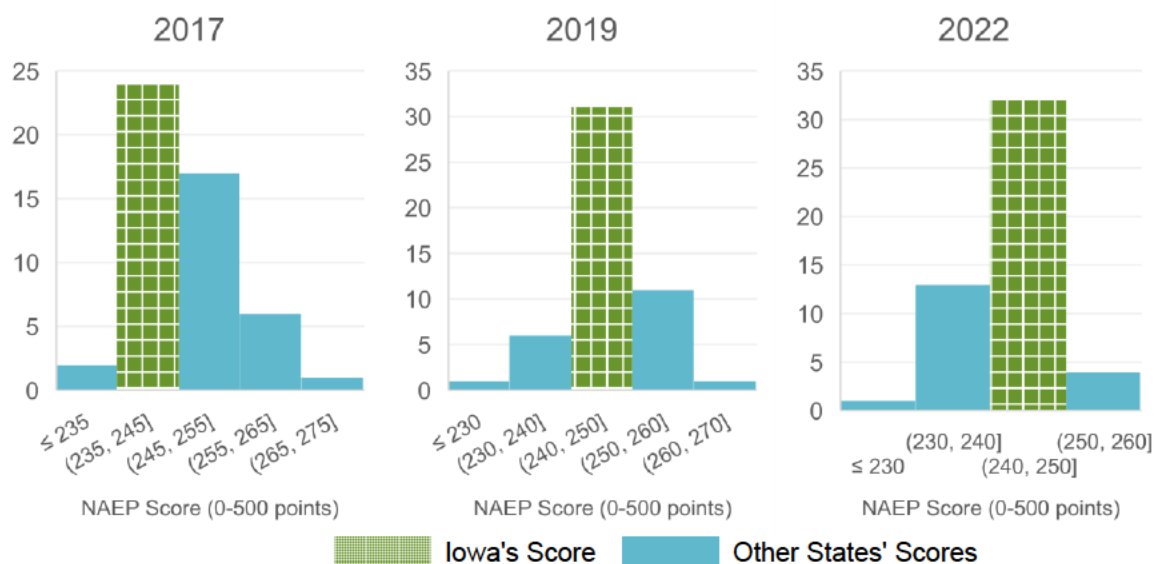
E.2.5.2: 8th Grade Students with Disabilities Math Scores

Iowa's students with disabilities had 8th grade math scores of 242.7 in 2017, 243.6 in 2019, and 245.5 in 2022. See Figure 28.

²⁹² bid., 2017, 2019, and 2022 Math Assessments.

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Figure 28: 2017, 2019, and 2022 NAEP 8th Grade Math Scores of Students with Disabilities ²⁹³



E.2.5.3: Math NAEP Scores by Year and State

Table 24: 2017 Math NAEP Scores

2017 Math NAEP Scores				
State	4 th Grade All Students	4 th Grade Students with Disabilities	8 th Grade All Students	8 th Grade Students with Disabilities
Iowa	243 (rank: 11th)	210 (rank: 34th)	286 (rank: 15th)	243 (rank: 30th)
Alabama	232 (rank: 45 th)	204 (rank: 45 th)	268 (rank: 49 th)	230 (rank: 50 th)
Alaska	230 (rank: 48 th)	202 (rank: 50 th)	277 (rank: 38 th)	242 (rank: 37 th)
Arizona	234 (rank: 41 st)	210 (rank: 34 th)	282 (rank: 24 th)	243 (rank: 30 th)
Arkansas	234 (rank: 41 st)	210 (rank: 34 th)	274 (rank: 45 th)	237 (rank: 45 th)
California	232 (rank: 45 th)	210 (rank: 34 th)	277 (rank: 38 th)	242 (rank: 37 th)
Colorado	241 (rank: 16 th)	210 (rank: 34 th)	286 (rank: 15 th)	252 (rank: 12 th)
Connecticut	239 (rank: 28 th)	215 (rank: 20 th)	284 (rank: 21 st)	254 (rank: 9 th)
Delaware	236 (rank: 35 th)	209 (rank: 40 th)	278 (rank: 36 th)	243 (rank: 30 th)
Florida	246 (rank: 7 th)	231 (rank: 1 st)	279 (rank: 34 th)	258 (rank: 4 th)
Georgia	236 (rank: 35 th)	211 (rank: 30 th)	281 (rank: 30 th)	252 (rank: 12 th)
Hawaii	238 (rank: 30 th)	203 (rank: 49 th)	277 (rank: 38 th)	238 (rank: 44 th)
Idaho	240 (rank: 24 th)	212 (rank: 25 th)	284 (rank: 21 st)	239 (rank: 43 rd)
Illinois	238 (rank: 30 th)	212 (rank: 25 th)	282 (rank: 24 th)	243 (rank: 30 th)
Indiana	247 (rank: 6 th)	221 (rank: 9 th)	288 (rank: 8 th)	260 (rank: 3 rd)
Kansas	241 (rank: 16 th)	216 (rank: 17 th)	285 (rank: 20 th)	249 (rank: 21 st)
Kentucky	239 (rank: 28 th)	216 (rank: 17 th)	278 (rank: 36 th)	243 (rank: 30 th)

²⁹³ bid., 2017, 2019, and 2022 Math Assessments.

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2017 Math NAEP Scores				
State	4 th Grade All Students	4 th Grade Students with Disabilities	8 th Grade All Students	8 th Grade Students with Disabilities
Iowa	243 (rank: 11th)	210 (rank: 34th)	286 (rank: 15th)	243 (rank: 30th)
Louisiana	229 (rank: 50 th)	204 (rank: 45 th)	267 (rank: 50 th)	240 (rank: 42 nd)
Maine	240 (rank: 24 th)	211 (rank: 30 th)	284 (rank: 21 st)	245 (rank: 24 th)
Maryland	241 (rank: 16 th)	210 (rank: 34 th)	281 (rank: 30 th)	244 (rank: 26 th)
Massachusetts	249 (rank: 1 st)	227 (rank: 4 th)	297 (rank: 1 st)	266 (rank: 1 st)
Michigan	236 (rank: 35 th)	208 (rank: 41 st)	280 (rank: 33 rd)	242 (rank: 37 th)
Minnesota	249 (rank: 1 st)	230 (rank: 2 nd)	294 (rank: 2 nd)	258 (rank: 4 th)
Mississippi	235 (rank: 40 th)	215 (rank: 20 th)	271 (rank: 47 th)	237 (rank: 45 th)
Missouri	240 (rank: 24 th)	217 (rank: 15 th)	281 (rank: 30 th)	244 (rank: 26 th)
Montana	241 (rank: 16 th)	213 (rank: 23 rd)	286 (rank: 15 th)	244 (rank: 26 th)
Nebraska	246 (rank: 7 th)	223 (rank: 6 th)	288 (rank: 8 th)	248 (rank: 22 nd)
Nevada	232 (rank: 45 th)	208 (rank: 41 st)	275 (rank: 42 nd)	243 (rank: 30 th)
New Hampshire	245 (rank: 9 th)	219 (rank: 10 th)	293 (rank: 3 rd)	262 (rank: 2 nd)
New Jersey	248 (rank: 3 rd)	225 (rank: 5 th)	292 (rank: 4 th)	253 (rank: 10 th)
New Mexico	230 (rank: 48 th)	204 (rank: 45 th)	269 (rank: 48 th)	236 (rank: 48 th)
New York	236 (rank: 35 th)	212 (rank: 25 th)	282 (rank: 24 th)	250 (rank: 20 th)
North Carolina	241 (rank: 16 th)	213 (rank: 23 rd)	282 (rank: 24 th)	242 (rank: 37 th)
North Dakota	244 (rank: 10 th)	217 (rank: 15 th)	288 (rank: 8 th)	255 (rank: 7 th)
Ohio	241 (rank: 16 th)	212 (rank: 25 th)	288 (rank: 8 th)	251 (rank: 15 th)
Oklahoma	237 (rank: 33 rd)	219 (rank: 10 th)	275 (rank: 42 nd)	241 (rank: 41 st)
Oregon	233 (rank: 44 th)	211 (rank: 30 th)	282 (rank: 24 th)	251 (rank: 15 th)
Pennsylvania	242 (rank: 12 th)	219 (rank: 10 th)	286 (rank: 15 th)	251 (rank: 15 th)
Rhode Island	238 (rank: 30 th)	206 (rank: 44 th)	277 (rank: 38 th)	245 (rank: 24 th)
South Carolina	234 (rank: 41 st)	204 (rank: 45 th)	275 (rank: 42 nd)	237 (rank: 45 th)
South Dakota	242 (rank: 12 th)	219 (rank: 10 th)	286 (rank: 15 th)	244 (rank: 26 th)
Tennessee	237 (rank: 33 rd)	211 (rank: 30 th)	279 (rank: 34 th)	243 (rank: 30 th)
Texas	241 (rank: 16 th)	222 (rank: 8 th)	282 (rank: 24 th)	253 (rank: 10 th)
Utah	242 (rank: 12 th)	216 (rank: 17 th)	287 (rank: 14 th)	247 (rank: 23 rd)
Vermont	241 (rank: 16 th)	207 (rank: 43 rd)	288 (rank: 8 th)	251 (rank: 15 th)
Virginia	248 (rank: 3 rd)	228 (rank: 3 rd)	290 (rank: 5 th)	255 (rank: 7 th)
Washington	242 (rank: 12 th)	218 (rank: 14 th)	289 (rank: 6 th)	251 (rank: 15 th)
West Virginia	236 (rank: 35 th)	212 (rank: 25 th)	273 (rank: 46 th)	234 (rank: 49 th)
Wisconsin	240 (rank: 24 th)	215 (rank: 20 th)	288 (rank: 8 th)	252 (rank: 12 th)
Wyoming	248 (rank: 3 rd)	223 (rank: 6 th)	289 (rank: 6 th)	256 (rank: 6 th)

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Table 25: 2019 Math NAEP Scores

2019 Math NAEP Score				
State	4 th Grade All Students	4 th Grade Students with Disabilities	8 th Grade All Students	8 th Grade Students with Disabilities
Iowa	241 (rank: 18th)	203 (rank: 48th)	282 (rank: 23rd)	244 (rank: 28th)
Alabama	230 (rank: 50 th)	197 (rank: 50 th)	269 (rank: 49 th)	231 (rank: 49 th)
Alaska	232 (rank: 46 th)	211 (rank: 34 th)	274 (rank: 43 rd)	244 (rank: 28 th)
Arizona	238 (rank: 34 th)	211 (rank: 34 th)	280 (rank: 27 th)	244 (rank: 28 th)
Arkansas	233 (rank: 45 th)	205 (rank: 44 th)	274 (rank: 43 rd)	237 (rank: 45 th)
California	235 (rank: 44 th)	218 (rank: 15 th)	276 (rank: 38 th)	249 (rank: 14 th)
Colorado	242 (rank: 15 th)	214 (rank: 24 th)	285 (rank: 16 th)	248 (rank: 18 th)
Connecticut	243 (rank: 13 th)	221 (rank: 7 th)	286 (rank: 9 th)	254 (rank: 9 th)
Delaware	239 (rank: 27 th)	211 (rank: 34 th)	277 (rank: 37 th)	241 (rank: 42 nd)
Florida	246 (rank: 4 th)	231 (rank: 1 st)	279 (rank: 34 th)	257 (rank: 5 th)
Georgia	238 (rank: 34 th)	215 (rank: 21 st)	279 (rank: 34 th)	247 (rank: 22 nd)
Hawaii	239 (rank: 27 th)	202 (rank: 49 th)	275 (rank: 42 nd)	229 (rank: 50 th)
Idaho	242 (rank: 15 th)	215 (rank: 21 st)	286 (rank: 9 th)	244 (rank: 28 th)
Illinois	237 (rank: 37 th)	204 (rank: 45 th)	283 (rank: 22 nd)	244 (rank: 28 th)
Indiana	245 (rank: 7 th)	225 (rank: 2 nd)	286 (rank: 9 th)	256 (rank: 6 th)
Kansas	239 (rank: 27 th)	213 (rank: 27 th)	282 (rank: 23 rd)	243 (rank: 36 th)
Kentucky	239 (rank: 27 th)	214 (rank: 24 th)	278 (rank: 36 th)	242 (rank: 40 th)
Louisiana	231 (rank: 47 th)	212 (rank: 32 nd)	272 (rank: 47 th)	244 (rank: 28 th)
Maine	241 (rank: 18 th)	213 (rank: 27 th)	282 (rank: 23 rd)	249 (rank: 14 th)
Maryland	239 (rank: 27 th)	212 (rank: 32 nd)	280 (rank: 27 th)	248 (rank: 18 th)
Massachusetts	247 (rank: 2 nd)	225 (rank: 2 nd)	294 (rank: 1 st)	263 (rank: 1 st)
Michigan	236 (rank: 41 st)	209 (rank: 39 th)	280 (rank: 27 th)	243 (rank: 36 th)
Minnesota	248 (rank: 1 st)	224 (rank: 4 th)	291 (rank: 3 rd)	258 (rank: 2 nd)
Mississippi	241 (rank: 18 th)	220 (rank: 12 th)	274 (rank: 43 rd)	240 (rank: 44 th)
Missouri	238 (rank: 34 th)	209 (rank: 39 th)	281 (rank: 26 th)	244 (rank: 28 th)
Montana	241 (rank: 18 th)	214 (rank: 24 th)	284 (rank: 20 th)	243 (rank: 36 th)
Nebraska	244 (rank: 9 th)	219 (rank: 14 th)	285 (rank: 16 th)	249 (rank: 14 th)
Nevada	236 (rank: 41 st)	211 (rank: 34 th)	274 (rank: 43 rd)	237 (rank: 45 th)
New Hampshire	245 (rank: 7 th)	217 (rank: 18 th)	287 (rank: 5 th)	256 (rank: 6 th)
New Jersey	246 (rank: 4 th)	222 (rank: 6 th)	292 (rank: 2 nd)	258 (rank: 2 nd)
New Mexico	231 (rank: 47 th)	204 (rank: 45 th)	269 (rank: 49 th)	242 (rank: 40 th)
New York	237 (rank: 37 th)	206 (rank: 43 rd)	280 (rank: 27 th)	246 (rank: 24 th)
North Carolina	241 (rank: 18 th)	213 (rank: 27 th)	284 (rank: 20 th)	248 (rank: 18 th)
North Dakota	243 (rank: 13 th)	217 (rank: 18 th)	286 (rank: 9 th)	248 (rank: 18 th)
Ohio	241 (rank: 18 th)	213 (rank: 27 th)	286 (rank: 9 th)	251 (rank: 10 th)
Oklahoma	237 (rank: 37 th)	218 (rank: 15 th)	276 (rank: 38 th)	245 (rank: 26 th)
Oregon	236 (rank: 41 st)	215 (rank: 21 st)	280 (rank: 27 th)	245 (rank: 26 th)
Pennsylvania	244 (rank: 9 th)	221 (rank: 7 th)	285 (rank: 16 th)	250 (rank: 12 th)

Special Education in the State of Iowa

2019 Math NAEP Score				
State	4 th Grade All Students	4 th Grade Students with Disabilities	8 th Grade All Students	8 th Grade Students with Disabilities
Iowa	241 (rank: 18th)	203 (rank: 48th)	282 (rank: 23rd)	244 (rank: 28th)
Rhode Island	239 (rank: 27 th)	213 (rank: 27 th)	276 (rank: 38 th)	241 (rank: 42 nd)
South Carolina	237 (rank: 37 th)	211 (rank: 34 th)	276 (rank: 38 th)	232 (rank: 47 th)
South Dakota	241 (rank: 18 th)	216 (rank: 20 th)	287 (rank: 5 th)	246 (rank: 24 th)
Tennessee	240 (rank: 25 th)	221 (rank: 7 th)	280 (rank: 27 th)	243 (rank: 36 th)
Texas	244 (rank: 9 th)	221 (rank: 7 th)	280 (rank: 27 th)	255 (rank: 8 th)
Utah	244 (rank: 9 th)	220 (rank: 12 th)	285 (rank: 16 th)	247 (rank: 22 nd)
Vermont	239 (rank: 27 th)	208 (rank: 42 nd)	287 (rank: 5 th)	251 (rank: 10 th)
Virginia	247 (rank: 2 nd)	224 (rank: 4 th)	287 (rank: 5 th)	258 (rank: 2 nd)
Washington	240 (rank: 25 th)	218 (rank: 15 th)	286 (rank: 9 th)	244 (rank: 28 th)
West Virginia	231 (rank: 47 th)	204 (rank: 45 th)	272 (rank: 47 th)	232 (rank: 47 th)
Wisconsin	242 (rank: 15 th)	209 (rank: 39 th)	289 (rank: 4 th)	249 (rank: 14 th)
Wyoming	246 (rank: 4 th)	221 (rank: 7 th)	286 (rank: 9 th)	250 (rank: 12 th)

Table 26: 2022 Math NAEP Scores

2022 Math NAEP Scores				
State	4 th Grade All Students	4 th Grade Students with Disabilities	8 th Grade All Students	8 th Grade Students with Disabilities
Iowa	240 (rank: 5th)	210 (rank: 32nd)	277 (rank: 14th)	245 (rank: 23rd)
Alabama	230 (rank: 38 th)	212 (rank: 24 th)	264 (rank: 46 th)	231 (rank: 49 th)
Alaska	226 (rank: 47 th)	203 (rank: 43 rd)	270 (rank: 34 th)	248 (rank: 9 th)
Arizona	232 (rank: 34 th)	209 (rank: 35 th)	271 (rank: 31 st)	239 (rank: 38 th)
Arkansas	228 (rank: 44 th)	200 (rank: 48 th)	267 (rank: 43 rd)	241 (rank: 32 nd)
California	230 (rank: 38 th)	215 (rank: 13 th)	270 (rank: 34 th)	242 (rank: 30 th)
Colorado	236 (rank: 20 th)	215 (rank: 13 th)	275 (rank: 20 th)	244 (rank: 28 th)
Connecticut	236 (rank: 20 th)	213 (rank: 20 th)	276 (rank: 16 th)	247 (rank: 14 th)
Delaware	226 (rank: 47 th)	204 (rank: 42 nd)	264 (rank: 46 th)	237 (rank: 43 rd)
Florida	241 (rank: 4 th)	229 (rank: 1 st)	271 (rank: 31 st)	250 (rank: 5 th)
Georgia	235 (rank: 26 th)	218 (rank: 8 th)	271 (rank: 31 st)	246 (rank: 18 th)
Hawaii	237 (rank: 18 th)	196 (rank: 50 th)	270 (rank: 34 th)	233 (rank: 46 th)
Idaho	236 (rank: 20 th)	211 (rank: 26 th)	282 (rank: 2 nd)	250 (rank: 5 th)
Illinois	237 (rank: 18 th)	218 (rank: 8 th)	275 (rank: 20 th)	251 (rank: 4 th)
Indiana	239 (rank: 9 th)	220 (rank: 4 th)	279 (rank: 9 th)	248 (rank: 9 th)
Kansas	235 (rank: 26 th)	213 (rank: 20 th)	272 (rank: 28 th)	236 (rank: 45 th)
Kentucky	234 (rank: 29 th)	210 (rank: 32 nd)	269 (rank: 39 th)	241 (rank: 32 nd)
Louisiana	229 (rank: 40 th)	209 (rank: 35 th)	266 (rank: 44 th)	238 (rank: 38 th)
Maine	233 (rank: 34 th)	206 (rank: 41 st)	273 (rank: 25 th)	240 (rank: 35 th)

Special Education in the State of Iowa

2022 Math NAEP Scores				
State	4 th Grade All Students	4 th Grade Students with Disabilities	8 th Grade All Students	8 th Grade Students with Disabilities
Iowa	240 (rank: 5th)	210 (rank: 32nd)	277 (rank: 14th)	245 (rank: 23rd)
Maryland	229 (rank: 40 th)	211 (rank: 26 th)	269 (rank: 39 th)	248 (rank: 9 th)
Massachusetts	242 (rank: 2 nd)	217 (rank: 11 th)	284 (rank: 1 st)	256 (rank: 1 st)
Michigan	232 (rank: 34 th)	208 (rank: 38 th)	273 (rank: 25 th)	240 (rank: 35 th)
Minnesota	239 (rank: 9 th)	220 (rank: 4 th)	280 (rank: 8 th)	255 (rank: 2 nd)
Mississippi	234 (rank: 29 th)	213 (rank: 20 th)	266 (rank: 44 th)	238 (rank: 38 th)
Missouri	232 (rank: 34 th)	203 (rank: 43 rd)	272 (rank: 28 th)	246 (rank: 18 th)
Montana	239 (rank: 9 th)	214 (rank: 17 th)	277 (rank: 14 th)	245 (rank: 23 rd)
Nebraska	242 (rank: 2 nd)	219 (rank: 6 th)	279 (rank: 9 th)	242 (rank: 30 th)
Nevada	229 (rank: 40 th)	211 (rank: 26 th)	269 (rank: 39 th)	238 (rank: 38 th)
New Hampshire	239 (rank: 9 th)	211 (rank: 26 th)	279 (rank: 9 th)	248 (rank: 9 th)
New Jersey	239 (rank: 9 th)	219 (rank: 6 th)	281 (rank: 4 th)	248 (rank: 9 th)
New Mexico	221 (rank: 50 th)	200 (rank: 48 th)	259 (rank: 50 th)	233 (rank: 46 th)
New York	227 (rank: 46 th)	201 (rank: 46 th)	274 (rank: 22 nd)	247 (rank: 14 th)
North Carolina	236 (rank: 20 th)	211 (rank: 26 th)	274 (rank: 22 nd)	240 (rank: 35 th)
North Dakota	240 (rank: 5 th)	213 (rank: 20 th)	278 (rank: 13 th)	245 (rank: 23 rd)
Ohio	238 (rank: 16 th)	207 (rank: 39 th)	276 (rank: 16 th)	238 (rank: 38 th)
Oklahoma	229 (rank: 40 th)	210 (rank: 32 nd)	264 (rank: 46 th)	237 (rank: 43 rd)
Oregon	228 (rank: 44 th)	211 (rank: 26 th)	270 (rank: 34 th)	246 (rank: 18 th)
Pennsylvania	238 (rank: 16 th)	212 (rank: 24 th)	274 (rank: 22 nd)	246 (rank: 18 th)
Rhode Island	234 (rank: 29 th)	209 (rank: 35 th)	270 (rank: 34 th)	241 (rank: 32 nd)
South Carolina	234 (rank: 29 th)	207 (rank: 39 th)	269 (rank: 39 th)	232 (rank: 48 th)
South Dakota	239 (rank: 9 th)	216 (rank: 12 th)	281 (rank: 4 th)	247 (rank: 14 th)
Tennessee	236 (rank: 20 th)	218 (rank: 8 th)	272 (rank: 28 th)	245 (rank: 23 rd)
Texas	239 (rank: 9 th)	221 (rank: 2 nd)	273 (rank: 25 th)	247 (rank: 14 th)
Utah	240 (rank: 5 th)	214 (rank: 17 th)	282 (rank: 2 nd)	249 (rank: 8 th)
Vermont	234 (rank: 29 th)	202 (rank: 45 th)	276 (rank: 16 th)	244 (rank: 28 th)
Virginia	236 (rank: 20 th)	214 (rank: 17 th)	279 (rank: 9 th)	252 (rank: 3 rd)
Washington	235 (rank: 26 th)	214 (rank: 16 th)	276 (rank: 16 th)	245 (rank: 23 rd)
West Virginia	226 (rank: 47 th)	201 (rank: 46 th)	260 (rank: 49 th)	227 (rank: 50 th)
Wisconsin	240 (rank: 5 th)	215 (rank: 13 th)	281 (rank: 4 th)	246 (rank: 18 th)
Wyoming	243 (rank: 1 st)	221 (rank: 2 nd)	281 (rank: 4 th)	250 (rank: 5 th)

Appendix F: Financials

F.1: Fiscal Year 2020 Expenditure Analysis

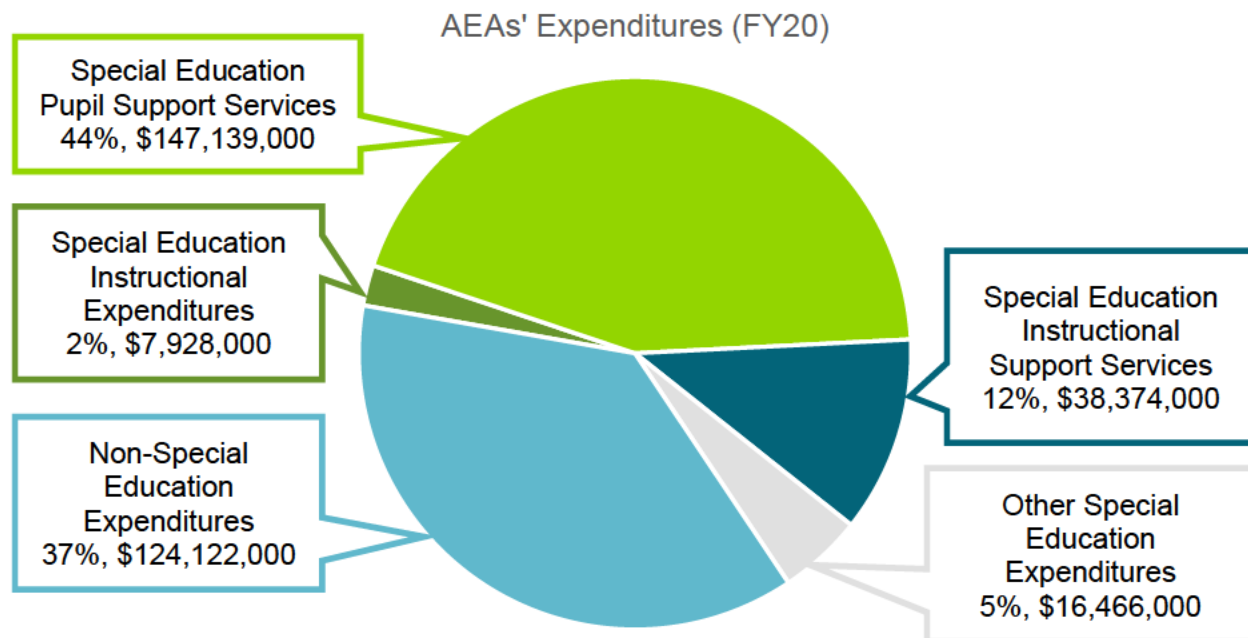
The National Center for Education Statistics (NCES), an agency of the US Department of Education, collects and reports statistics on education and schools within the United States. For fiscal year 2020 (school year 2019-2020), NCES surveyed school districts and other entities that provide public education for revenue and expenditure data. This is the latest available district-level dataset available from NCES. Along with broad expenditure categories and general education details, in FY20, NCES requested five special education expenditure amounts for the first time:

- Current special education expenditure (total amount for the year);
- Instruction special education expenditure;
- Pupil support services for special education expenditure;
- Instructional staff support services for special education expenditure; and
- Student transportation support services expenditure.

F.1.1: AEA Expenditures

Based on FY20 NCES data, AEA's spent roughly 62.8% of their total expenditures on special education, with individual AEA's spending between 48.0% to 70.8% of their budgets on special education expenditures.²⁹⁴ See Figure 29.

Figure 29: AEA's Expenditures (FY20 NCES Data)



²⁹⁴ National Center for Education Statistics (accessed in September 2023), CCD Data Files 2019-2020, District Finance Survey (F-33). Available at: <https://nces.ed.gov/ccd/files.asp#Fiscal:1,LevelId:5,Page:1>.

AEAs reported the largest portion of their funds in FY20 went to special education pupil support services, with the next largest amount for non-special education expenditures. Non-special education expenditures (37% of total expenditures) include but is not limited to administration support services, technology, operations of facilities, community services, and capital outlay.

F.1.2: 50-State Comparison

To standardize state-level educational expenditures for comparison across the 50 states, expenditure levels were adjusted using the US Bureau of Economic Analysis' Regional Price Parities by State (RPP) for the applicable age of data (in this case, for FY20). The RPP adjustment helps account for regional and state pricing differences in the provision of goods and services across the country. State education expenditures are multiplied by the RPP adjustment compared to the national average, with some states having higher than average pricing parity, and others having lower. For reference, in FY20, Iowa had a state RPP of 90.268 compared to the United States' collective RPP of 100 (the 44th lowest in the country).²⁹⁵

²⁹⁵ US Bureau of Economic Analysis (published December 15, 2022), SARPP Regional price parities by state. Available at: https://apps.bea.gov/itable/index.html?appid=70&stepnum=40&Major_Area=3&State=0&Area=XX&TableId=101&Statistic=1&Year=2020&YearBegin=-1&Year_End=-1&Unit_Of_Measure=Levels&Rank=1&Drill=1&nRange=5&Appld=70.

Special Education in the State of Iowa

F.1.2.1: Special Education Per-Pupil Expenditure Amounts

Table 27: Special Education Per-Pupil Expenditure Amounts by State

State	Unadjusted Special Education Student Per-Pupil Expenditure Amount*	Adjusted Special Education Student Per-Pupil Expenditure*
Iowa	\$15,938	\$14,387
Alabama	\$7,892	\$6,901
Alaska	\$1,760	\$1,774
Arizona	\$0	\$0
Arkansas	\$6,524	\$5,764
California	\$16,343	\$18,290
Colorado	\$9,956	\$10,342
Connecticut	\$26,294	\$27,589
Delaware	\$0	\$0
Florida	\$0	\$0
Georgia	\$11,185	\$10,561
Hawaii	\$22,533	\$25,397
Idaho	\$8,144	\$7,408
Illinois	\$12,467	\$12,538
Indiana	\$0	\$0
Kansas	\$0	\$0
Kentucky	\$8,650	\$7,701
Louisiana	\$11,998	\$10,914
Maine	\$15,655	\$15,296
Maryland	\$17,666	\$18,800
Massachusetts	\$0	\$0
Michigan	\$0	\$0
Minnesota	\$0	\$0
Mississippi	\$5,162	\$4,431
Missouri	\$11,506	\$10,611
Montana	\$9,161	\$8,396
Nebraska	\$11,888	\$10,991
Nevada	\$10,435	\$10,134
New Hampshire	\$26,064	\$27,435
New Jersey	\$17,559	\$19,431
New Mexico	\$8,580	\$7,862
New York	\$0	\$0
North Carolina	\$8,126	\$7,431
North Dakota	\$15,256	\$14,073
Ohio	\$1,497	\$1,379
Oklahoma	\$5,729	\$5,146
Oregon	\$13,077	\$13,525

Special Education in the State of Iowa

State	Unadjusted Special Education Student Per-Pupil Expenditure Amount*	Adjusted Special Education Student Per-Pupil Expenditure*
Iowa	\$15,938	\$14,387
Pennsylvania	\$0	\$0
Rhode Island	\$20,768	\$21,174
South Carolina	\$7,610	\$6,928
South Dakota	\$10,462	\$9,491
Tennessee	\$8,264	\$7,482
Texas	\$11,383	\$11,240
Utah	\$6,405	\$6,097
Vermont	\$0	\$0
Virginia	\$14,648	\$14,809
Washington	\$15,890	\$17,145
West Virginia	\$9,245	\$8,077
Wisconsin	\$0	\$0
Wyoming	\$17,360	\$15,868

*Twelve states reported \$0 in special education expenditures to NCES in FY20.

F.1.2.2: General Education Per-Pupil Expenditure Amounts

Table 28: General Education Per-Pupil Expenditure Amounts - Summary Statistics

Metric	Unadjusted	Adjusted
50-State Average	\$12,103	\$11,916
50-State Median	\$11,284	\$10,586
Standard Deviation	\$3,688	\$4,257

Table 29: General Education Per-Pupil Expenditure Amounts by State

State	Unadjusted General Education Per-Pupil Expenditure Amount	Adjusted General Education Per-Pupil Expenditure
Iowa	\$9,812	\$8,857
Alabama	\$9,096	\$7,954
Alaska	\$18,054	\$18,196
Arizona	\$8,844	\$8,784
Arkansas	\$9,270	\$8,191
California	\$11,840	\$13,252
Colorado	\$10,372	\$10,773
Connecticut	\$16,149	\$16,944
Delaware	\$16,682	\$16,105
Florida	\$9,868	\$9,938
Georgia	\$10,230	\$9,659
Hawaii	\$14,060	\$15,847
Idaho	\$7,274	\$6,616
Illinois	\$15,385	\$15,473
Indiana	\$10,832	\$9,955

Special Education in the State of Iowa

State	Unadjusted General Education Per-Pupil Expenditure Amount	Adjusted General Education Per-Pupil Expenditure
Iowa	\$9,812	\$8,857
Kansas	\$12,732	\$11,745
Kentucky	\$10,038	\$8,938
Louisiana	\$10,400	\$9,461
Maine	\$12,339	\$12,056
Maryland	\$13,289	\$14,142
Massachusetts	\$18,615	\$20,312
Michigan	\$12,726	\$12,033
Minnesota	\$13,537	\$13,239
Mississippi	\$8,891	\$7,632
Missouri	\$9,606	\$8,859
Montana	\$10,878	\$9,969
Nebraska	\$11,021	\$10,189
Nevada	\$8,214	\$7,977
New Hampshire	\$12,566	\$13,227
New Jersey	\$17,557	\$19,429
New Mexico	\$9,883	\$9,056
New York	\$25,132	\$27,671
North Carolina	\$8,786	\$8,034
North Dakota	\$12,073	\$11,136
Ohio	\$13,303	\$12,253
Oklahoma	\$8,409	\$7,553
Oregon	\$10,767	\$11,136
Pennsylvania	\$16,935	\$16,559
Rhode Island	\$13,294	\$13,554
South Carolina	\$10,710	\$9,750
South Dakota	\$8,551	\$7,758
Tennessee	\$8,827	\$7,992
Texas	\$9,084	\$8,970
Utah	\$7,423	\$7,066
Vermont	\$20,906	\$21,339
Virginia	\$10,876	\$10,996
Washington	\$12,411	\$13,392
West Virginia	\$10,834	\$9,465
Wisconsin	\$12,624	\$11,697
Wyoming	\$14,156	\$12,939

Special Education in the State of Iowa

F.1.2.3: Total Per-Pupil Expenditures for Special Education Students

Since students with disabilities have the additional special education per-pupil expenditures on top of their general education per-pupil expenditures, the total expenditures for a student with a disability is the aggregate expenditure of both values.

Figure 30: Total Per-Pupil Expenditure Amounts for Special Education Students Components

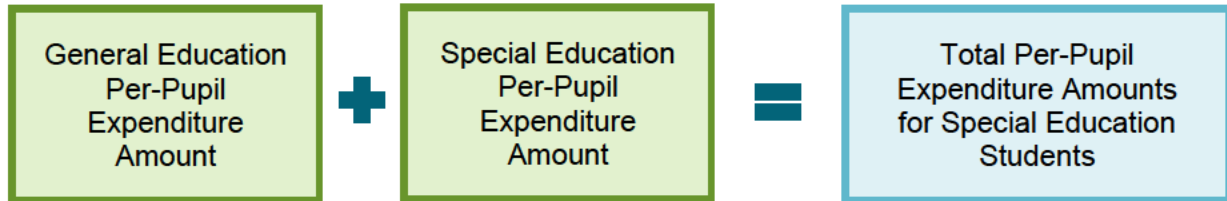


Table 30: Total Per-Pupil Expenditure Amounts for Special Education Students - Summary Statistics

Metric	Unadjusted	Adjusted
50-State Average	\$21,285	\$20,938
50-State Median	\$19,926	\$18,917
Standard Deviation	\$7,702	\$8,771

Table 31: Total Special Education Student Per-Pupil Expenditure Amounts by State

State	Unadjusted Total Special Education Student Per-Pupil Expenditure Amount	Adjusted Total Special Education Student Per-Pupil Expenditure
Iowa	\$25,750	\$23,244
Alabama	\$16,987	\$14,856
Alaska	\$19,814	\$19,970
Arizona	\$8,844	\$8,784
Arkansas	\$15,794	\$13,955
California	\$28,183	\$31,542
Colorado	\$20,328	\$21,115
Connecticut	\$42,443	\$44,532
Delaware	\$16,682	\$16,105
Florida	\$9,868	\$9,938
Georgia	\$21,415	\$20,220
Hawaii	\$36,593	\$41,243
Idaho	\$15,418	\$14,024
Illinois	\$27,852	\$28,010
Indiana	\$10,832	\$9,955
Kansas	\$12,732	\$11,745
Kentucky	\$18,688	\$16,639
Louisiana	\$22,397	\$20,374
Maine	\$27,994	\$27,352
Maryland	\$30,956	\$32,943
Massachusetts	\$18,615	\$20,312
Michigan	\$12,726	\$12,033

Special Education in the State of Iowa

State	Unadjusted Total Special Education Student Per-Pupil Expenditure Amount	Adjusted Total Special Education Student Per-Pupil Expenditure
Iowa	\$25,750	\$23,244
Minnesota	\$13,537	\$13,239
Mississippi	\$14,053	\$12,063
Missouri	\$21,112	\$19,470
Montana	\$20,039	\$18,365
Nebraska	\$22,909	\$21,180
Nevada	\$18,649	\$18,111
New Hampshire	\$38,630	\$40,662
New Jersey	\$35,117	\$38,861
New Mexico	\$18,463	\$16,919
New York	\$25,132	\$27,671
North Carolina	\$16,912	\$15,465
North Dakota	\$27,328	\$25,209
Ohio	\$14,800	\$13,631
Oklahoma	\$14,137	\$12,699
Oregon	\$23,845	\$24,662
Pennsylvania	\$16,935	\$16,559
Rhode Island	\$34,062	\$34,728
South Carolina	\$18,320	\$16,678
South Dakota	\$19,013	\$17,249
Tennessee	\$17,091	\$15,474
Texas	\$20,467	\$20,210
Utah	\$13,828	\$13,162
Vermont	\$20,906	\$21,339
Virginia	\$25,524	\$25,804
Washington	\$28,301	\$30,536
West Virginia	\$20,078	\$17,541
Wisconsin	\$12,624	\$11,697
Wyoming	\$31,517	\$28,807

Special Education in the State of Iowa

F.1.3: Indicator States Comparison

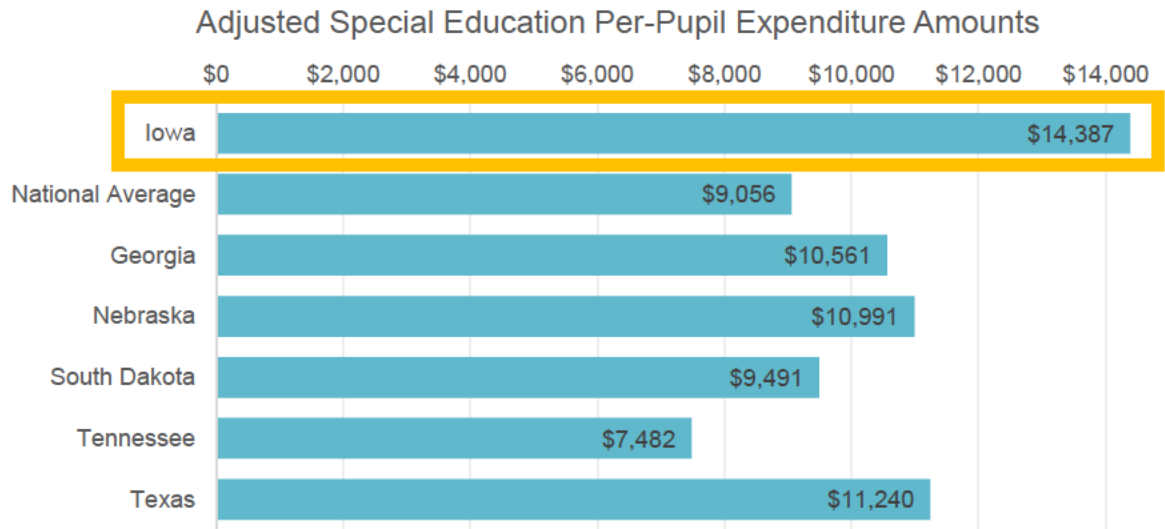
Table 32: Special Education Per-Pupil Expenditures by Type for Iowa and Indicator States

		Iowa	National Average	Georgia	Nebraska	South Dakota	Tennessee	Texas
Adjusted	Total Per-Pupil Expenditure	\$14,387	\$9,056	\$10,561	\$10,991	\$9,491	\$7,482	\$11,240
	Instruction	\$10,595	\$6,556	\$9,653	\$8,352	\$6,558	\$6,355	\$7,550
	Pupil Support Services	\$2,226	\$1,321	\$490	\$1,933	\$2,589	\$0	\$1,554
	Instructional Staff Support Services	\$598	\$253	\$192	\$0	\$14	\$1,128	\$1,649
	Student Transportation	\$647	\$277	\$165	\$706	\$290	\$0	\$450
Unadjusted	Total Per-Pupil Expenditure	\$15,938	\$9,182	\$11,185	\$11,888	\$10,462	\$8,264	\$11,383
	Instruction	\$11,738	\$6,647	\$10,224	\$9,034	\$7,228	\$7,018	\$7,646
	Pupil Support Services	\$2,466	\$1,322	\$519	\$2,090	\$2,854	\$0	\$1,574
	Instructional Staff Support Services	\$662	\$257	\$203	\$0	\$15	\$1,245	\$1,670
	Student Transportation	\$717	\$281	\$175	\$763	\$320	\$0	\$456

Florida reported \$0 in special education expenditures to NCES in FY20.

Special Education in the State of Iowa

Figure 31: Adjusted Special Education Per-Pupil Expenditure Amounts for Iowa and Indicator States (FY20)



Florida reported \$0 in special education expenditures to NCES in FY20.

F.2: Historical Budget Trends

Using the Iowa Department of Management’s publicized AEA Enrollment and Costs documents and an inflation calculator, analysis found that AEA’s budget from state and local funds has stayed consistent across the past ten years (FY14 - FY24) averaging roughly \$267 million. From the last 18 years, budgets have ranged from \$237.9 million (FY07) to \$280.6 million (FY11), with an average of \$261.2 million.^{296, 297}

Figure 32: Historical Budgets of FY07-FY24

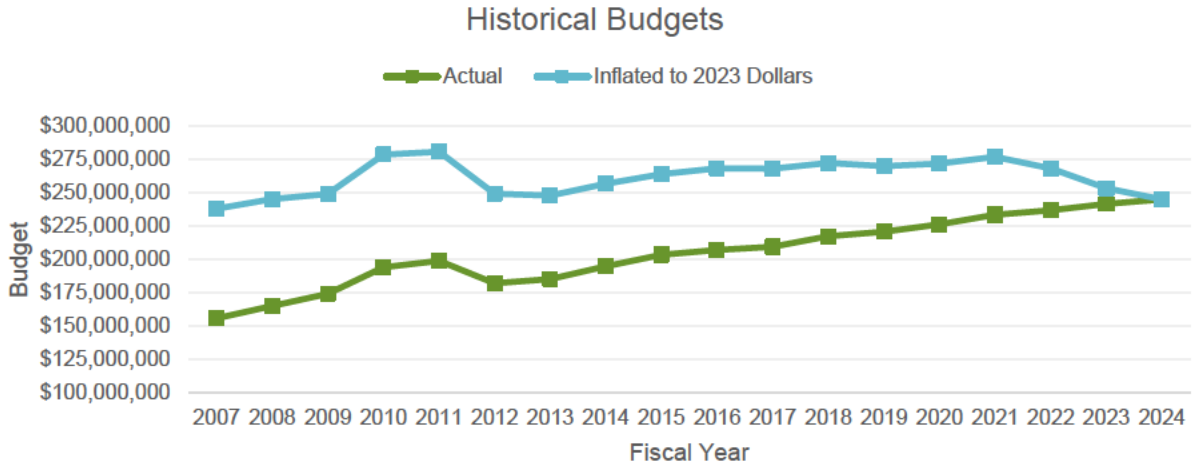


Table 33: Historical Budgets, State Aid, and Property Tax in Actual and 2023 Dollars, and Percent Change from Year-to-Year (FY07-FY24)²⁹⁸

FY	Budget		State Aid		Property Tax	
	Value (Value Inflated to 2023 Dollars)	Percent Change from previous FY (from 2023 Dollars)	Value (Value Inflated to 2023 Dollars) [Percent of Budget]	Percent Change from previous FY (from 2023 Dollars)	Value (Value Inflated to 2023 Dollars) [Percent of Budget]	Percent Change from previous FY (from 2023 Dollars)
2007	\$155,831,400 (\$237,912,653)	Not Available	Unavailable	Unavailable	Unavailable	Unavailable
2008	\$165,105,386 (\$245,090,824)	+6.0% (+3.0%)	Unavailable	Unavailable	Unavailable	Unavailable
2009	\$174,063,639 (\$248,834,774)	+5.4% (+1.5%)	Unavailable	Unavailable	Unavailable	Unavailable
2010	\$194,009,838 (\$278,339,373)	+11.5% (+11.9%)	Unavailable	Unavailable	Unavailable	Unavailable
2011	\$198,768,032 (\$280,563,772)	+2.5% (+0.8%)	Unavailable	Unavailable	Unavailable	Unavailable

²⁹⁶ Budget values have been inflated to 2023 dollars for comparison.

²⁹⁷ Iowa Department of Management (accessed on October 11, 2023), AEA Enrollment and Cost Detail, FY07-FY24. Available at: <https://dom.iowa.gov/aea-enrollment-costs?page=0>.

²⁹⁸ US Inflation Calculator (accessed on October 10, 2023), Inflation Calculator. Available at: <https://www.usinflationcalculator.com/>.

Special Education in the State of Iowa

FY	Budget		State Aid		Property Tax	
	Value (Value Inflated to 2023 Dollars)	Percent Change from previous FY (from 2023 Dollars)	Value (Value Inflated to 2023 Dollars) [Percent of Budget]	Percent Change from previous FY (from 2023 Dollars)	Value (Value Inflated to 2023 Dollars) [Percent of Budget]	Percent Change from previous FY (from 2023 Dollars)
2012	\$182,162,685 (\$249,257,224)	-8.4% (-11.2%)	Unavailable	Unavailable	Unavailable	Unavailable
2013	\$185,187,535 (\$247,643,179)	+1.7% (-0.6%)	Unavailable	Unavailable	Unavailable	Unavailable
2014	\$194,781,827 (\$256,712,978)	+5.2% (+3.7%)	\$107,866,092 (\$142,162,265) [55.4%]	Unavailable	\$86,915,735 (\$114,550,713) [44.6%]	Unavailable
2015	\$203,332,654 (\$263,704,766)	+4.4% (+2.7%)	\$113,706,914 (\$147,467,977) [55.9%]	+5.4% (+3.7%)	\$89,625,740 (\$116,236,789) [44.1%]	+3.1% (+1.5%)
2016	\$206,954,018 (\$268,083,152)	+1.8% (+1.7%)	\$115,846,458 (\$150,064,656) [56.0%]	+1.9% (+1.8%)	\$91,107,560 (\$118,018,495) [44.0%]	+1.7% (+1.5%)
2017	\$209,440,551 (\$267,924,246)	+1.2% (-0.1%)	\$116,114,559 (\$148,538,120) [55.4%]	+0.2% (-1.0%)	\$93,325,992 (\$119,386,126) [44.6%]	+2.4% (+1.2%)
2018	\$217,233,478 (\$272,096,629)	3.7% (+1.6%)	\$122,048,467 (\$152,872,277) [56.2%]	+5.1% (+2.9%)	\$95,185,011 (\$119,224,352) [43.8%]	+2.0% (-0.1%)
2019	\$220,653,247 (\$269,790,503)	+1.6% (-0.8%)	\$123,872,044 (\$151,457,101) [56.1%]	+1.5% (-0.9%)	\$96,781,203 (\$118,333,402) [43.9%]	+1.7% (-0.7%)
2020	\$226,245,976 (\$271,705,437)	+2.5% (+0.7%)	\$127,756,918 (\$153,427,035) [56.5%]	+3.1% (+1.3%)	\$98,489,058 (\$118,278,402) [43.5%]	+1.8% (-0.1%)
2021	\$233,275,615 (\$276,733,520)	3.1% (+1.9%)	\$132,552,173 (\$157,245,880) [56.8%]	+3.8% (+2.5%)	\$100,723,442 (\$119,487,640) [43.2%]	+2.3% (+1.0%)
2022	\$236,673,716 (\$268,166,160)	+1.5% (-3.1%)	\$134,482,289 (\$152,376,866) [56.8%]	+1.5% (-3.1%)	\$102,191,427 (\$115,789,294) [43.2%]	+1.5% (-3.1%)
2023	\$241,465,645 (\$253,322,961)	+2.0% (-5.5%)	\$136,818,462 (\$143,537,015) [56.7%]	+1.7% (-5.8%)	\$104,647,183 (\$109,785,946) [43.3%]	+2.4% (-5.2%)
2024	\$244,857,014 (\$244,857,014)	+1.4% (-3.3%)	\$137,427,339 (\$137,427,339) [56.1%]	+0.4% (-4.3%)	\$107,429,675 (\$107,429,675) [43.9%]	+2.7% (-2.1%)

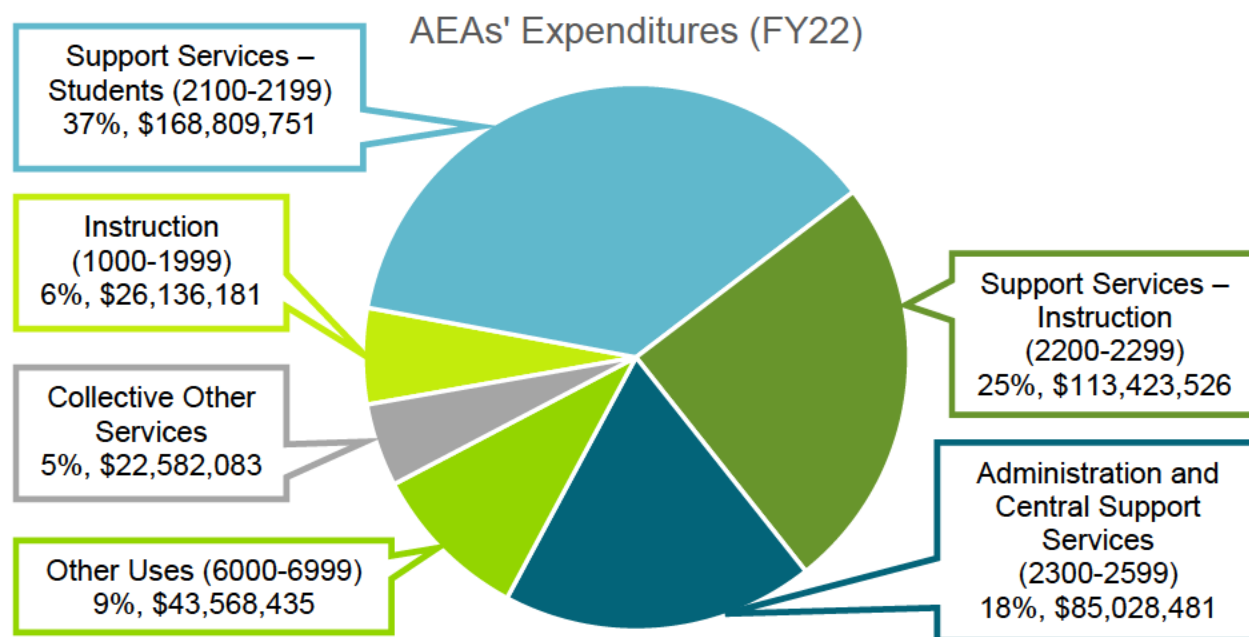
F.3: Fiscal Year 2022 Expenditure Analyses

F.3.1: Function Header Analysis

Analysis of student-centered expenditures began by classifying function codes based on function header definitions using the Iowa Chart of Accounts. Function codes under the Support Services-Instruction function header were then classified at the function code level to provide a more accurate breakdown of expenditures under this function header.^{299, 300}

AEAs' total expenditures, from all revenue sources, exceeded \$459 million in FY22. Figure 36 demonstrates these expenditures broken down by function headers and function details.³⁰¹ Based on function headers, AEAs spent the greatest portion of their funds on student support services (37%, or \$168,809,751), a pattern similar to expenditures shown in special education expenditure categories in FY20 NCES data.

Figure 33: Iowa AEAs' Expenditures (FY22) by Iowa Chart of Account Coding Function Headers and Functions



Collective Other Services (5% of total AEA expenditures) include the following function headers:

- Operation and Maintenance of Plant (2600-2699);
- Student Transportation (2700-2799);
- Other Support Services (2900-2999);
- Operation of Non-Instructional Services (3000-3999);
- Facilities Acquisition and Construction (4000-4999); and
- Debt Service (5000-5999).

²⁹⁹ Iowa's Certified Annual Report for AEAs, Fiscal Year 2022.

³⁰⁰ Iowa Department of Education (published September 29, 2023), Iowa Chart of Account Coding. Available at: https://educateiowa.gov/sites/default/files/2023-09/22-23_COA_UFA9.29.2023.pdf.

³⁰¹ Iowa's Certified Annual Report for AEAs, Fiscal Year 2022.

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Table 34: AEA's Expenditures by Function Header (FY22)

Function Header	Amount	Percent of Expenditures
Instruction (1000-1999)	\$26,136,181	5.7%
Support Services-Students (2100-2199)	\$168,809,751	36.7%
Support Services-Instruction (2200-2299)	\$113,423,526	24.7%
Administration and Central Support Services (2300-2599)	\$85,028,481	18.5%
Operation and Maintenance of Plant (2600-2699)	\$9,539,638	2.1%
Student Transportation (2700-2799)	\$764	< 0.001%
Other Support Services (2900-2999)	\$437,386	< 0.1%
Operation of Non-Instructional Services (3000-3999)	\$946,830	0.2%
Facilities Acquisition and Construction (4000-4999)	\$4,716,353	1.0%
Debt Service (5000-5999)	\$6,941,113	1.5%
Other Uses (6000-6999)	\$43,568,435	9.5%

F.3.2: Cost Type Analysis

AEAs' FY22 expenditures were also analyzed based on the Iowa Chart of Account Coding's function, program, and object header codes, and bucketed into five broad categories that capture the ultimate use and purpose of expenditures across Iowa's education ecosystem. These categorization buckets are presented in the table below, including a description of each category that was used to classify function, program, and object header codes.

Table 35: Breakdown of AEA's Expenditures (FY22)

Name	Description	Amount	Percent
Program or Program Adjacent Expenses	Program or Program Adjacent Expenses include direct instructional costs or costs incurred to directly support the program (e.g., classroom teachers, classroom materials, instructional support services, professional development for staff). This also includes \$7.4m in costs incurred for administrators paid with federal program dollars or restricted state aid as those funds would follow the program costs.	\$332,938,956	75.8%
Administrative Responsibilities	Administrative Responsibilities includes costs to operate the AEA including costs for administrative staff, board of education, operations, capital projects, and debt service.	\$81,844,932	18.6%
Purchased AEA Services and Finance Uses	Purchased AEA Services and Finance Uses includes expenditures incurred at the request of another entity who paid the AEA to provide services beyond its statutory requirements (e.g., summer school) as well as interfund transfers and downward adjustments.	\$24,390,918	5.6%

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Name	Description	Amount	Percent
Categories Removed from Analysis to Avoid Duplicate Counting of Expenditures			
Expenditures Already Included in Other Categories	Expenditures Already Included in Other Categories are internal service funds and the only revenues received here are payments from another AEA fund (e.g., monthly employee premiums for self-insured health benefit plan).	\$17,436,372	
Funds Held and Expended for Others	Funds Held and Expended for Others are funds held by the AEA for another entity (e.g., serving as a fiscal agent of a consortia of school districts) and they have no operational or decision-making authority over these funds.	\$2,937,280	

F.4: Staff Positions Analysis

The Iowa Condition of Education report details the number of full-time instructional and noninstructional staff employed throughout Iowa's public districts, nonpublic schools, and AEAs, and also provides demographic, salary, experience, and position details. The 2022 Condition of Education report data is derived from the Basic Educational Data Survey (BEDS) Fall 2021 submission to the Iowa Department of Education and was used to analyze school district staffing as shown in Table 37 below. The Iowa Department of Education provided Fall 2022 BEDS staffing data, which includes both full- and part-time staff, to analyze AEA staffing, and is presented in Table 38.

Table 36: Averages of School District Positions, Total Salaries, Years of Experience, and Staff Counts across the State of Iowa

School District Position Names	(A) Average Total Salary	(B) Sum of Staff Count
Assistant Principal	\$101,635.00	337
Assistant Superintendent	\$159,458.00	24
Content / Curriculum Consultant	\$83,146.00	77
Counselor	\$64,738.00	1435
Dean of Students	\$83,887.00	65
Director / Coordinator / Department Head	\$79,561.00	645
Early Childhood Regular Education Teacher	\$56,389.00	565
Early Childhood Special Education Teacher	\$56,807.00	549
Home Intervention Teacher	\$64,096.00	7
Hospital/Homebound Teacher	\$72,553.00	4
Itinerant Teacher	\$55,443.00	14
Juvenile Home Teacher	\$59,426.00	1
Long-Term Substitutes	\$42,987.00	33
Non-Administrative School Administration Manager	\$60,477.00	50
Nurse	\$57,939.00	326
Other Administrator	\$108,933.00	349
Principal	\$111,502.00	1158
Project Lead the Way Teacher	\$66,218.00	168
Regular Education Teacher	\$61,019.00	29803
School Business Official	\$87,437.00	228
Social Worker	\$65,598.00	79
Special Education Support	\$66,659.00	78
Special Education Consultant	\$73,869.00	33
Special Education Director	\$109,469.00	62
Special Education Teacher	\$59,622.00	5538
Specialist	\$74,377.00	65
Superintendent	\$166,986.00	263

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School District Position Names	(A) Average Total Salary	(B) Sum of Staff Count
Supervisor - Licensed	\$91,688.00	6
Teacher Leader	\$74,068.00	1750
Teacher Librarian / Media Specialist	\$68,788.00	382
Average of Averages (A)/Grand Total (B)	\$79,492.50	44,094

Table 37: Averages of AEA Positions, Total Salaries, Years of Experience, and Staff Counts across the State of Iowa

School District Position Names	(A) Average Total Salary	(B) Sum of Staff Count
AEA Chief Administrator	\$240,693.22	9
AEA Regional/Zone Coordinator	\$134,489.16	91
AEA Supervisors/Managers	\$104,493.95	21
Board Secretary	\$82,515.00	6
Content/Curriculum Consultant	\$79,891.61	272
Counselor	\$72,445.20	5
Director/Coordinator/Department Head	\$113,499.12	25
District Coordinator	\$123,364.60	5
District Wide Administrative Support	\$50,728.97	158
Early Childhood Special Education	\$74,412.79	77
Home Intervention Teacher	\$68,690.00	13
HR/Personnel Manager	\$128,845.86	7
Itinerant Teacher	\$72,488.61	87
Juvenile Home Teacher	\$71,720.55	33
Library/Media Associate	\$33,609.15	26
Nurse	\$78,224.50	4
Operations and Maintenance	\$35,341.32	34
Other Administrator	\$154,291.07	15
Other Professional	\$71,394.83	24
Other Support	\$40,334.39	87
Other Technical Staff	\$39,481.17	12
Paraprofessionals/Aides	\$28,916.54	214
Records Transfer Staff	\$38,267.86	7
Regular Education Teacher	\$58,383.75	4
School Administrative Support	\$58,438.35	17
School Business Official	\$137,191.00	10
School Business Officials - Other	\$126,384.75	4
Sign Language Interpreters	\$39,105.29	34
Social Worker	\$72,855.07	220
Special Education Consultant	\$79,703.62	403

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Special Education Director	\$132,354.43	14
Special Education Support	\$71,906.10	1,208
Special Education Teacher	\$66,046.63	59
Specialist	\$70,569.17	29
Student Support	\$28,327.12	43
Supervisor - Non-Licensed	\$56,443.50	2
Teacher Leader	\$72,105.75	4
Teacher Librarian/ Media Specialist	\$76,686.56	9
Technology	\$80,313.61	57
Technology Support	\$58,557.16	50
Transportation (Non-pupil)	\$25,309.38	26
Average of Averages (A)/Grand Total (B)	\$79,239.53	3,425