



FINDINGS BRIEF 1 · DATA AS OF OCTOBER 2, 2026

What eighteen **IEP** reviews found

Aggregate findings from independent reviews of written individualized programming for students with disabilities.

The written educational program for a student with a disability matters.

An IEP is not merely paperwork completed at a meeting. It is the child's individualized programming, designed to explicitly address documented needs and support meaningful progress. When it is vague, disconnected, generic, or difficult to interpret, families may have greater difficulty understanding what is planned for their child, and school teams may have less clarity about how the program's parts should work together.

EDquity has not identified a publicly available nationwide federal dataset that comprehensively assesses the substantive quality of full written individualized programming.

Federal reporting includes selected IEP-related measures, particularly transition planning under Indicator 13 for youth age 16 and older. Public data can show how many students receive IDEA services and where they are educated. Public data cannot show whether an individual IEP is high quality, or whether a family understands and can use the written program. This brief shares what independent review of individual documents has found so far.

HOW DOCUMENTS WERE REVIEWED

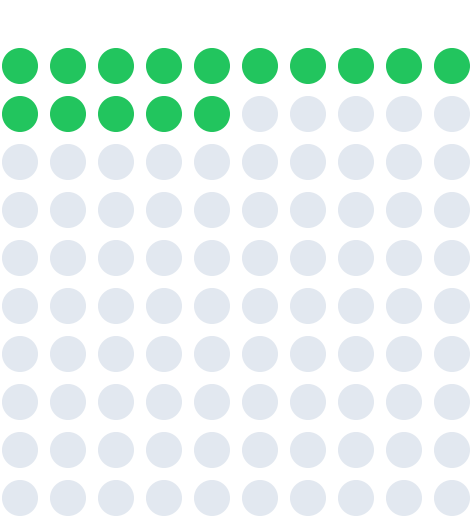
Each IEP was examined against conditions anchored in IDEA (34 C.F.R. § 300.320) and in the standard the Supreme Court set in *Endrew F. v. Douglas County School District RE-1* (2017), with state conditions added where a state requires more than federal law does.

TWO KINDS OF INDICATORS

Document-level indicators examine whether required elements are present. **Substantive-quality** indicators examine whether the programming explains what the child needs, what is planned, and how progress will be measured.

- i** The sample is 18 voluntarily submitted, de-identified IEPs. No personally identifiable information about any student, family, educator, school, or district appears in this brief. Eleven were submitted by families; seven were submitted by teachers for rubric refinement only. Findings describe this defined sample only. They do not establish legal noncompliance, educator intent, or the quality of any school or district, and they do not represent all students or all school systems.

Out of every 100 public-school students, about 15 receive IDEA services and about 85 do not.



15
receive IDEA services

85
do not

In the 2022–23 school year, 7,525,941 children and students ages 3 to 21 received special education and related services under IDEA Part B, representing 15.2 percent of United States public-school enrollment (National Center for Education Statistics [NCES], 2024a, Table 204.40).

This statistic establishes scale. It does not indicate whether individualized programming is high quality, whether services are sufficient, whether a student is making progress, or whether a particular school acted appropriately.

PUBLIC DATA CAN SHOW	PUBLIC DATA CANNOT SHOW
How many students receive IDEA services	Whether an individual IEP is high quality
Disability categories and service rates	Whether a program explicitly addresses a child’s documented needs
Educational environments and placement patterns	Whether services, supports, and accommodations are aligned or adequate
State and district variation	Whether a family understands and can use the written program

Because public data do not evaluate the substantive quality of written individualized programming, EDquity begins with independent review of individual documents. The pages that follow describe the basis for that review.

Who is served under IDEA, 2022–23

SERVICE RATES BY RACE AND ETHNICITY¹

Out of every 100 public-school students within each group, how many received IDEA Part B services?



DISABILITY CATEGORIES²

Among students ages 3 to 21 served under IDEA Part B, what percentage received services in each category?



HOW TO READ THESE FIGURES

These figures describe who is served. They are not findings about IEP quality, disability prevalence, discrimination, or individual need. The equity relevance is contextual: disability can intersect with race, ethnicity, language, family income, culture, geography, and prior experiences with institutions.

¹ National IDEA service rates, not formal significant-disproportionality findings. Formal determinations use state-defined methods and risk-ratio calculations and address identification, placement, and discipline (34 C.F.R. §§ 300.646–300.647). Source: NCES (2024a), *Digest of Education Statistics 2023*, Table 204.40.

² Multiple disabilities, hearing, orthopedic, and visual impairments, traumatic brain injury, and deaf-blindness each accounted for 2 percent or less. A student served for more than one IDEA-defined disability is counted under multiple disabilities. Source: NCES (2024c), *Students with disabilities*, Condition of Education; *Digest* Table 204.30.

Three kinds of statements in this brief

This brief separates what the law requires, what published guidance recommends, and what EDquity has chosen as its own review standard. Each finding should be read with its source in mind.

1

Legal requirements

REQUIRED BY LAW

An IEP must include present levels, measurable annual goals, and a description of how progress will be measured and reported.

Source: 34 C.F.R. § 300.320(a)(1)–(3). The U.S. Supreme Court held that an IEP must be reasonably calculated to enable a child to make progress appropriate in light of the child’s circumstances (*Endrew F.*, 2017).

2

Published guidance

CLARITY CHECK

The Stranger Test asks whether someone unfamiliar with the IEP could implement a goal, measure it, and tell whether progress is satisfactory.

Referenced in state guidance (Iowa Department of Education, n.d.; Washington Office of Superintendent of Public Instruction, 2024). It is not an independent IDEA requirement and was not created by EDquity.

3

EDquity’s organizational positions

OUR REVIEW STANDARD

A strong present level has three parts. A measurable annual goal has seven components.

Present level: comparative achievement information, individual progress information, and narrative and contextual information. Goal: condition, observable skill or behavior, baseline, target, frequency, evaluation schedule, and measurement tool. They are not federal requirements. They draw on Dr. Reba Clarke-Wedderburn’s professional experience as a curriculum designer for a special education teacher licensure program; no ownership of that curriculum is claimed.

SOURCES

Endrew F. v. Douglas County School District RE–1, 580 U.S. 386 (2017).

National Center for Education Statistics. (2024a). *Table 204.40. Children 3 to 21 years old served under Individuals with Disabilities Education Act (IDEA), Part B, by race/ethnicity and age group: School years 2000–01 through 2022–23*. In *Digest of Education Statistics, 2023*. U.S. Department of Education, Institute of Education Sciences.

Iowa Department of Education. (n.d.). *Components of an IEP*. Iowa IDEA Information. <https://iowaideainformation.org/special-education/individualized-education-programs/components-of-an-iep/>

Office of the Federal Register, National Archives and Records Administration. (2025). *34 C.F.R. § 300.320: Definition of individualized education program*. U.S. Government Publishing Office.

Washington Office of Superintendent of Public Instruction. (2024). *Tips from the Special Education Division: Progress reporting*.

WHAT EIGHTEEN REVIEWS FOUND

Document-level indicators and substantive-quality indicators

82%

of document-level indicators met



30%

of substantive-quality indicators met



FINDINGS OVER TIME



June 2026

Family intake opens



Brief 1: October 2026

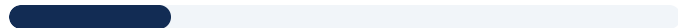
18 reviews · 82% document-level · 30% substantive-quality

Totals include seven teacher-submitted IEPs used for rubric refinement only. Rubric changes between briefs will be noted here.

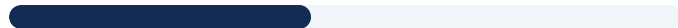
EDquity's organizational position is that a document may contain required headings while still failing to function as substantive individualized programming.

INDICATORS MET, BY IEP SECTION

Overall coherence 24%



Annual goals 45%



Accommodations 58%



Present levels 65%



Services 80%



Transition is omitted because most students reviewed are below the age at which transition planning begins.

THE PATTERN ACROSS INDICATORS

19 of 21 indicators met in 80 percent or more of documents are document-level indicators.

8 of 10 indicators not met in 80 percent or more of documents are substantive-quality indicators.

Findings present in all 18 documents

Each finding below was present in every document reviewed. Counts describe a defined, voluntarily submitted sample.

18_{of18}

DOCUMENTS

No annual goal states a baseline, so there is no starting point from which to measure growth

WHY IT MATTERS

A baseline names the starting point each goal builds from. Without one, the team cannot measure how much progress the student made by the end of the year.

18_{of18}

DOCUMENTS

Progress measurement is not specific enough that two teachers applying it would produce the same result

WHY IT MATTERS

When two teachers applying the same method could arrive at different results, progress data cannot be relied on to show whether the program is working.

18_{of18}

DOCUMENTS

A teacher who had never met the student could not carry out the programming as written

WHY IT MATTERS

When teachers change or a student moves to a new school, the document has to stand on its own, without one teacher's knowledge of the student.

18_{of18}

DOCUMENTS

Language is not accessible to a family member without a special education background

WHY IT MATTERS

Federal law makes the parent a required member of the IEP team. When the language is inaccessible, the family's ability to participate meaningfully and give informed consent is limited.

The third finding reflects the published Stranger Test (Iowa Department of Education, n.d.; Washington Office of Superintendent of Public Instruction, 2024). The Stranger Test is not an independent IDEA requirement.

Findings present in most documents

Where a finding could not be scored for a document, that document is not counted, so totals vary.

15 of 15

DOCUMENTS

Present levels do not name a specific, repeatedly measured skill deficit for every area of need

WHY IT MATTERS

A single observation can capture an unusual day. Without a specific, repeatedly measured deficit, the team cannot aim a goal at the right skill or set a reliable baseline.

14 of 15

DOCUMENTS

Present levels do not draw on assessment, classroom, and narrative data together for each area of need

WHY IT MATTERS

A test score shows how far performance is from expectations; classroom data shows which skill; narrative information describes conditions for learning. Each alone is incomplete.

16 of 18

DOCUMENTS

Goals do not reflect a meaningful annual gain from the starting point

WHY IT MATTERS

A target set too close to current performance may not reflect progress appropriate in light of the student's circumstances, the standard set in *Endrew F.* (2017).

15 of 18

DOCUMENTS

Accommodations do not vary by subject or setting where needs differ

WHY IT MATTERS

A single accommodation list applied to every subject can provide more support than needed in some areas while leaving the student under-supported in others.

14 of 18

DOCUMENTS

The document is not internally consistent across needs, goals, services, and accommodations

WHY IT MATTERS

When a documented need is not connected to a goal, a service, and an accommodation, the document does not show how that need will be addressed.

Aggregate findings can inform professional development for teachers and leaders.

High-quality individualized programming requires more than informed parents. Educators need support in understanding what substantive programming can look like. Leaders need systems that support staffing, professional learning, quality review, feedback, data use, implementation, and accountability. Aggregate trend information identifies where that support is most needed.

RECURRING FINDING	PROFESSIONAL LEARNING FOCUS
Goals without baselines; progress measurement that is not specific	Writing measurable annual goals: baseline, target, frequency, evaluation schedule, and measurement tool
Present levels that do not draw on multiple data sources for each area of need	Developing substantive present levels from comparative achievement, individual progress, and narrative information
Documents not internally consistent across needs, goals, services, and accommodations	Aligning documented needs with goals, specially designed instruction, services, supports, and accommodations
Language not accessible to a family member	Writing for family usability and meaningful participation in decision-making

FOR TEACHERS

Teacher professional development and the IEP Quality Improvement Program apply the same rubric used in family reviews, so learning targets the indicators where documents are weakest.

FOR LEADERS

The Leader Fellowship focuses on the systems, staff practices, decision-making structures, and accountability routines that shape how IEPs are authored, implemented, reviewed, and improved over time.

i Aggregate trend information supports professional learning, process improvement, leadership decision-making, and systems development. It is not designed to evaluate individual teachers. The pairing of findings and learning focus above reflects EDquity’s organizational position.

Questions a written program should answer

EDquity's organizational position is that a high-quality individualized program should allow a family, educator, related-service provider, and leader to answer the same practical questions:

- 1 What does this child need?
- 2 What is the child currently able to do?
- 3 What instruction, services, supports, and accommodations will be provided?
- 4 What progress is expected?
- 5 How will progress be measured?
- 6 How and when will progress information be shared?
- 7 What should the team examine if the student is not progressing?

FREE INDEPENDENT IEP REVIEW

Independent IEP reviews are provided to families at no cost.



The family receives a plain-language report identifying document-level indicators, substantive-quality findings, areas that are unclear, and questions that may warrant clarification with the school team. EDquity does not provide legal representation, make legal determinations, or substitute for the IEP Team.

REQUEST A REVIEW

edquityatthemargins.org

CONTACT

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