How the Department Made Determinations

under Section 616(d) of the *Individuals with Disabilities Education Act* in 2025:

Part B

Revised 06/20/2025

INTRODUCTION

In 2025, the U.S. Department of Education (Department) is continuing to use both results and compliance data in making our determination for each State under section 616(d) of the Individuals with Disabilities Education Act (*IDEA*). We considered the totality of the information we have about a State, including information related to the participation of children with disabilities (CWD) on Statewide assessments; the participation and performance of CWD on the most recently administered (2024) National Assessment of Educational Progress (NAEP); exiting data on CWD who dropped out and CWD who graduated with a regular high school diploma; the State's Federal fiscal year (FFY) 2023 State Performance Plan/Annual Performance Report (SPP/APR); information from monitoring and other public information, such as Specific Conditions on the State's grant award under IDEA Part B; and other issues related to State compliance with the *IDEA*. Below is a detailed description of how the Office of Special Education Programs (OSEP) evaluated States' data using the Results Driven Accountability (RDA) Matrix.

The RDA Matrix consists of:

1. a **Compliance Matrix** that includes scoring on SPP/APR Compliance Indicators and other compliance factors;
2. a **Results Matrix** that includes scoring on Results Elements;
3. a **Compliance Score** and a **Results Score**;
4. an **RDA Percentage** based on the Compliance Score and the Results Score; and
5. the State's **Determination**.

The scoring of each of the above evaluation criteria is further explained below in the following sections:

- 2025 Part B Compliance Matrix and Scoring of the Compliance Matrix
- 2025 Part B Results Matrix and Scoring of the Results Matrix
- 2025 RDA Percentage and 2025 Determination

A. 2025 PART B COMPLIANCE MATRIX

In making each State's 2025 determination, the Department used a Compliance Matrix, reflecting the following data:

1. The State's FFY 2023 data for Part B Compliance Indicators 4B, 9, 10, 11, 12, 13, and 18 (including whether the State reported valid and reliable data for each indicator); and whether the State demonstrated correction of all findings of noncompliance it had identified in FFY 2022 under such indicators;
2. The timeliness and accuracy of data reported by the State under sections 616 and 618 of the *IDEA*;
3. The State's FFY 2023 data, reported under section 618 of the *IDEA*, for the timeliness of State complaint and due process hearing decisions;
4. Longstanding Noncompliance:

   The Department considered:

   a. Whether OSEP imposed programmatic Specific Conditions on the State's FFY 2024 *IDEA* Part B grant award and those Specific Conditions are in effect at the time of the 2025 determination, and the number of years for which the State's Part B grant award has been subject to programmatic Specific Conditions; and

   b. Whether there are any findings of noncompliance identified in FFY 2021 or earlier by the State that the State has not yet corrected.

Scoring of the Compliance Matrix

The Compliance Matrix indicates a score of 0, 1, or 2, for each of the compliance indicators in item one above and for each of the additional factors listed in items two through four above. Using the cumulative possible number of points as the denominator, and using as the numerator the actual points, the State received in its scoring under these factors, the Compliance Matrix reflects a Compliance Score, which is combined with the Results Score to calculate the State's RDA Percentage and Determination.

Scoring of the Matrix for Compliance Indicators 4B, 9, 10, 11, 12, 13, and 18

In the attached State-specific 2025 Part B Compliance Matrix, a State received points as follows for each of the Compliance Indicators 4B, 9, 10, 11, 12, 13, and 18:[1]

- Two points, if either:
    - The State's FFY 2023 data for the indicator were valid and reliable, and reflect at least 95%[2] compliance (or, for Indicators 4B, 9, and 10, reflect no greater than 5% compliance);[3] or
    - The State's FFY 2023 data for the indicator were valid and reliable, and reflect at least 90% compliance (or, for Indicators 4B, 9, and 10, reflect no greater than 10% compliance); and the State identified one or more findings of noncompliance in FFY 2022 for the indicator, and has demonstrated correction of all findings of noncompliance identified in FFY 2022 for the indicator. Such full correction is indicated in the matrix with a "Yes" in the "Full Correction of Findings of Noncompliance Identified in FFY 2022" column.[4]
- One point, if the State's FFY 2023 data for the indicator were valid and reliable, and reflect at least 75% compliance (or, for Indicators 4B, 9, and 10, reflect no greater than 25% compliance), and the State did not meet either of the criteria above for two points.
- Zero points, under any of the following circumstances:
    - The State's FFY 2023 data for the indicator reflect less than 75% compliance (or, for Indicators 4B, 9, and 10, reflect greater than 25% compliance); or
    - The State's FFY 2023 data for the indicator were not valid and reliable;[5] or

[1] A notation of "N/A" (for "not applicable") in the "Performance" column for an indicator denotes that the indicator is not applicable to that particular State. The points for that indicator are not included in the denominator for the matrix.

[2] In determining whether a State has met the 95% compliance criterion for Indicators 11, 12, 13, and 18, the Department will round up from 94.5% (but no lower) to 95%. In determining whether a State has met the 90% compliance criterion for these indictors, the Department will round up from 89.5% (but no lower) to 90%. In addition, in determining whether a State has met the 75% compliance criterion for these indicators, the Department will round up from 74.5% (but no lower) to 75%. Similarly, in determining whether a State has met the 5% compliance criterion for Indicators 4B, 9, and 10, the Department will round down from 5.49% (but no higher) to 5%. In determining whether a State has met the 10% compliance criterion for these indicators, the Department will round down from 10.49% (but no higher) to 10%. In addition, in determining whether a State has met the 25% compliance criterion for these indicators, the Department will round down from 25.49% (but no higher) to 25%. The Department will also apply the rounding rules to the compliance criteria for 95% and 75% for: (1) the timeliness and accuracy of data reported by the State under sections 616 and 618 of the IDEA; and (2) the State's FFY 2023 data, reported under section 618 of the IDEA, for the timeliness of State complaint and due process hearing decisions.

[3] For Indicators 4B, 9, and 10, a very high level of compliance is generally at or below 5%.

[4] A "No" in that column denotes that the State has one or more remaining findings of noncompliance identified in FFY 2022 for which the State has not yet demonstrated correction. An "N/A" (for "not applicable") in that column denotes that the State did not identify any findings of noncompliance in FFY 2022 for the indicator.

[5] If a State's FFY 2023 data for any compliance indicator are not valid and reliable, the matrix so indicates in the "Performance" column, with a corresponding score of 0. The explanation of why the State's data are not valid and reliable is contained in the OSEP Response to the State's FFY 2023 SPP/APR in the EMAPS SPP/APR reporting tool.

- The State did not report FFY 2023 data for the indicator.[6]

Starting with the 2025 determinations, OSEP is using as a factor the performance on timely correction of noncompliance requirements in Indicator 18. In light of 2025 being the first year that States were required to report on Indicator 18 and performance on this indicator being included in this manner, OSEP determined that, while performance on Indicator 18 was a factor in each State or Entity's 2025 Part B Compliance Matrix, no State or Entity received a Needs Intervention determination in 2025 due solely to this criterion.

Scoring of the Matrix for Timely and Accurate State-Reported Data

In the attached State-specific 2025 Part B Compliance Matrix, a State received points as follows for Timely and Accurate State-Reported Data:[7]

- Two points, if the OSEP-calculated percentage reflects at least 95% compliance.
- One point, if the OSEP-calculated percentage reflects at least 75% and less than 95% compliance.
- Zero points, if the OSEP-calculated percentage reflects less than 75% compliance.

Scoring of the Matrix for Timely State Complaint Decisions and Timely Due Process Hearing Decisions

In the attached State-specific 2025 Part B Compliance Matrix, a State received points as follows for timely State complaint decisions and for timely due process hearing decisions, as reported by the State under section 618 of the *IDEA*:

- Two points, if the State's FFY 2023 data were valid and reliable, and reflect at least 95% compliance.
- One point, if the State's FFY 2023 data reflect at least 75% and less than 95% compliance.
- Zero points, if the State's FFY 2023 data reflect less than 75% compliance.
- Not Applicable (N/A), if the State's data reflect less than 100% compliance, and there were fewer than ten State complaint decisions or ten due process hearing decisions.

[6] If a State reported no FFY 2023 data for any compliance indicator (unless the indicator is not applicable to the State), the matrix so indicates in the "Performance" column, with a corresponding score of 0.

[7] OSEP used the Part B Timely and Accurate State-Reported Data Rubric to award points to States based on the timeliness and accuracy of their sections 616 and 618 data. A copy of the rubric is contained in the OSEP Response to the State's FFY 2023 SPP/APR in the EMAPS SPP/APR reporting tool. In the section of the rubric, entitled "Part B Timely and Accurate Data," States are given one point for each indicator with valid and reliable data and five points for SPP/APRs that were submitted timely. The total points for valid and reliable SPP/APR data and timely SPP/APR submission are added together to form the APR Grand Total. The State's section 618 data is scored based on information provided to OSEP on section 618 data timeliness, completeness, and edit checks from EDFacts. The percentage of Timely and Accurate State-Reported Data is calculated by adding the 618 Data Grand Total to the APR Grand Total and dividing this sum by the total number of points available for the entire rubric. This percentage is inserted into the Compliance Matrix.

Scoring of the Matrix for Longstanding Noncompliance (Includes Both Uncorrected Identified Noncompliance and Specific Conditions)

In the attached State-specific 2025 Part B Compliance Matrix, a State received points as follows for the Longstanding Noncompliance component:

- Two points, if the State has:
    - No remaining findings of noncompliance identified, by the State, in FFY 2021 or earlier; and
    - No programmatic Specific Conditions on its FFY 2024 IDEA Part B grant award that are in effect at the time of the 2025 determination.
- One point, if either or both of the following occurred:
    - The State has remaining findings of noncompliance identified, by the State, in FFY 2021, FFY 2020, and/or FFY 2019, for which the State has not yet demonstrated correction (see the OSEP Response to the State's FFY 2023 SPP/APR in the EMAPS SPP/APR reporting tool for specific information regarding these remaining findings of noncompliance); and/or
    - OSEP has imposed programmatic Specific Conditions on the State's FFY 2024 IDEA Part B grant award and those Specific Conditions are in effect at the time of the 2025 determination.
- Zero points, if either or both of the following occurred:
    - The State has remaining findings of noncompliance identified, by the State, in FFY 2018 or earlier, for which the State has not yet demonstrated correction (see the OSEP Response to the State's FFY 2023 SPP/APR in the EMAPS SPP/APR reporting tool for specific information regarding these remaining findings of noncompliance); and/or
    - OSEP has imposed programmatic Specific Conditions on the State's last three (FFYs 2022, 2023, and 2024) *IDEA* Part B grant awards, and those Specific Conditions are in effect at the time of the 2025 determination.

B. 2025 PART B RESULTS MATRIX

In making each State's 2025 determination, the Department used a Results Matrix reflecting the following data:

1. The percentage of fourth-grade CWD participating in Statewide assessments;[8]
2. The percentage of eighth-grade CWD participating in Statewide assessments;
3. The percentage of fourth-grade CWD scoring at basic[9] or above on the NAEP;
4. The percentage of fourth-grade CWD included in NAEP testing;
5. The percentage of eighth-grade CWD scoring at basic or above on the NAEP;
6. The percentage of eighth-grade CWD included in NAEP testing;
7. The percentage of CWD exiting school by dropping out; and
8. The percentage of CWD exiting school by graduating with a regular high school diploma.

The Results Elements for participation in Statewide assessments and participation and performance on the NAEP are scored separately for reading and math. When combined with the exiting data, there are a total of fourteen Results Elements. The Results Elements are defined as follows:

Percentage of CWD Participating in Statewide Assessments

This is the percentage of CWD, by grade (4 and 8) and subject (math and reading), who took Statewide assessments in school year (SY) 2023-2024. The numerator for this calculation is the number of CWD participating on Statewide assessments in SY 2023-2024, and the denominator is the number of all CWD participants and non-participants on Statewide assessments in SY 2023-2024, excluding medical emergencies. The calculation is done separately by grade (4 and 8) and subject (math and reading). (Data source: EDFacts SY 2023-2024; data extracted 1/8/2025)

Percentage of CWD Scoring at Basic or Above on the NAEP

This is the percentage of CWD, not including students with a Section 504 plan, by grade (4 and 8) and subject (math and reading), who scored at or above basic on the NAEP in the most recently administered NAEP (2024). (Data Source: Main NAEP Data Explorer; data extracted 3/13/2025)

[8] Statewide assessments include the regular assessment and the alternate assessment.

[9] While the goal is to ensure that all CWD demonstrate proficient or advanced mastery of challenging subject matter, we recognize that States may need to take intermediate steps to reach this benchmark. Therefore, we assessed the performance of CWD using the Basic achievement level on the NAEP, which also provided OSEP with the broader range of data needed to identify variations in student performance across States. Generally, the Basic achievement level on the NAEP means that students have demonstrated partial mastery of prerequisite knowledge and skills that are fundamental for proficient work at each grade.

Percentage of CWD Included in NAEP Testing

This is the reported percentage of identified CWD, by grade (4 and 8) and subject (math and reading), who were included in the NAEP testing in the most recently administered NAEP (2024). (Data Source: Nation's Report Card, 2024):

Inclusion rate for 4th and 8th grade reading (see page 11):

https://www.nationsreportcard.gov/reports/reading/2024/g4_8/supporting-files/2024_technical_appendix_reading_state_district.pdf

Inclusion rate for 4th and 8th grade math (see page 11):

https://www.nationsreportcard.gov/reports/mathematics/2024/g4_8/supporting-files/2024_technical_appendix_math_state_district.pdf

Percentage of CWD Exiting School by Dropping Out

This is a calculation of the percentage of CWD, ages 14 through 21, who exited school by dropping out. The percentage was calculated by dividing the number of students ages 14 through 21 served under *IDEA* Part B, reported in the exit reason category *dropped out* by the total number of students ages 14 through 21 served under *IDEA* Part B, reported in the six exit-from-both-special-education-and-school categories (*graduated with a regular high school diploma*, *graduated with an alternate diploma, received a certificate*, *dropped out*, *reached maximum age* for services, and *died)*, then multiplying the result by 100. (Data source: EDFacts SY 2022–2023; data extracted 2/21/2024)

Percentage of CWD Exiting School by Graduating with a Regular High School Diploma

This is a calculation of the percentage of CWD, ages 14 through 21, who exited school by graduating with a regular high school diploma.[10] The percentage was calculated by dividing the number of students ages 14 through 21 served under *IDEA* Part B, reported in the exit reason category *graduated with a regular high school diploma* by the total number of students ages 14 through 21 served under *IDEA* Part B, reported in the six exit-from-both-special-education-and-school categories (*graduated with a regular high school diploma, graduated with an alternate diploma, received a certificate*, *dropped out*, *reached maximum age* for services, and *died)*, then multiplying the result by 100. (Data source: EDFacts SY 2022–2023; data extracted 2/21/2024)

[10] When providing exiting data under section 618 of the IDEA, States are required to report, among other things, on the number of students with disabilities who exited an educational program through receipt of a regular high school diploma. These students met the same standards for graduation as those for students without disabilities. As stated in 34 C.F.R. § 300.102(a)(3)(iv), in effect June 30, 2017, "the term regular high school diploma means the standard high school diploma awarded to the preponderance of students in the State that is fully aligned with State standards, or a higher diploma, except that a regular high school diploma shall not be aligned to the alternate academic achievement standards described in section 1111(b)(1)(E) of the ESEA. A regular high school diploma does not include a recognized equivalent of a diploma, such as a general equivalency diploma, certificate of completion, certificate of attendance, or similar lesser credential."

Scoring of the Results Matrix

In the attached State-specific 2025 Part B Results Matrix, a State received points as follows for the Results Elements:

- A State's participation rates on Statewide assessments were assigned scores of '1' or '0' based on an analysis of the participation rates across all States and the percentage of CWD who participate in Statewide assessments under the Elementary and Secondary Education Act of 1965 (ESEA).[11] A score of '1' was assigned if at least 95% of CWD in a State participated in the Statewide assessments; States received a score of '0' if the participation rate for CWD was less than 95%.
- NAEP scores (Basic and above) for each State and the BIE[12] were rank-ordered, and the top, middle, and bottom thirds were determined using tertiles.[13] The scores that fell in the top tertile of States and the BIE (*i.e.*, those with the highest scores) received a '2', the scores that fell in the middle tertile of States and the BIE received a '1', and the scores that fell in the bottom tertile of States and the BIE (*i.e.*, those with the lowest scores) received a '0'.
- A State's NAEP inclusion rate was assigned a score of either '0' or '1' based on whether the State's NAEP inclusion rate for CWD was higher than or not significantly different from the National Assessment Governing Board [NAGB] goal of 85 percent.[14] "Standard error estimates" were reported with the inclusion rates of CWD and taken into account in determining if a State's inclusion rate was higher than or not significantly different from the NAGB goal of 85 percent.
- State's data on the percentage of CWD who exited school by dropping out were rank-ordered; the top tertile of States (*i.e.*, those with the lowest percentage) received a score of '2', the middle tertile of States received a '1', and the bottom tertile of States (*i.e.*, those with the highest percentage) received a '0'.
- A State's data on the percentage of CWD who exited school by graduating with a regular high school diploma were rank-ordered; the top tertile of States (*i.e.*, those with the highest percentage) received a score of '2', the middle tertile of States received a '1', and the bottom tertile of States (*i.e.*, those with the lowest percentage) received a '0'.

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[11] Under section 1111(c)(4)(E) of the ESEA, in measuring the performance of all students and each subgroup of students, States must annually measure the achievement of not less than 95 percent of all students, and 95 percent of all students in each subgroup of students, who are enrolled in public schools.

[12] For 2025 determinations, OSEP used NAEP data for the 50 States, the District of Columbia, Puerto Rico, and the Bureau of Indian Education. OSEP used the available NAEP data for Puerto Rico in making Puerto Rico's determination (as it did for Puerto Rico's 2024 determination). The available NAEP data for Puerto Rico is for math, not reading, because Puerto Rico administers the math, but not reading, NAEP. In addition, OSEP used the NAEP proficiency data, but not participation data, in making the BIE's 2025 determination. This is because NAEP proficiency data were available for the BIE that were comparable to the 50 States, the District of Columbia, and Puerto Rico; specifically the NAEP assessment conducted in 2024. However, BIE's participation data, previously released every four years through the National Indian Education Study (NIES) was not available. The most recent participation data available for BIE was from the NAEP conducted in 2019 and was not comparable to the data available for the 50 States, the District of Columbia, and Puerto Rico, thus it was not used.

[13] The tertiles of a data set divide it into three equal parts.

[14] National Assessment Governing Board-NAGB. (2010, 2014). *NAEP Testing and Reporting on Students with Disabilities and English Language Learners - Policy Statement.* Retrieved from https://www.nagb.gov/content/dam/nagb/en/documents/policies/naep_testandreport_studentswithdisabilities.pdf.

The following table identifies how each of the Results Elements was scored:

Results Elements	RDA Score= 0	RDA Score= 1	RDA Score= 2
Participation Rate of 4th and 8th Grade CWD on Statewide Assessments (reading and math, separately)	<95	>=95	N/A
Percentage of 4th grade CWD scoring Basic or above on reading NAEP	<21	21-25	>=26
Percentage of 8th grade CWD scoring Basic or above on reading NAEP	<25	25-30	>=31
Percentage of 4th grade CWD scoring Basic or above on math NAEP	<39	39-45	>=46
Percentage of 8th grade CWD scoring Basic or above on math NAEP	<17	17-22	>=23
Percentage of CWD Exiting School by Graduating with a Regular High School Diploma	<71	71-79	>=80
Percentage of CWD Exiting School by Dropping Out	>20	20-12	<=11
Percentage of 4th and 8th Grade CWD included in NAEP testing (reading or math): 1 point if State's inclusion rate was higher than or not significantly different from the NAGB goal of 85%. 0 points if less than 85%.			

Using the cumulative possible number of points as the denominator, and using as the numerator the actual points the State received in its scoring under the Results Elements, the Results Matrix reflects a Results Score, which is combined with the Compliance Score to calculate the State's RDA Percentage.

C. 2025 RDA Percentage and 2025 Determination

The State's RDA Percentage was calculated by adding 50% of the State's Results Score and 50% of the State's Compliance Score. As explained on page five above, while performance on timely correction of noncompliance requirements in Indicator 18 was a factor in each State or Entity's 2025 Part B Compliance Matrix, no State or Entity received a Needs Intervention determination in 2025 due solely to this criterion – specifically, if a State's RDA Percentage is less than 60% based solely on performance on Indicator 18, the State's 2025 RDA Determination is Needs Assistance instead of Needs Intervention. The State's RDA Determination is defined as follows:

Meets Requirements	A State's 2025 RDA Determination is Meets Requirements if the RDA Percentage is at least 80%,[15] unless the Department has imposed Specific Conditions on the State's last three (FFYs 2022, 2023, and 2024) *IDEA* Part B grant awards, and those Specific Conditions are in effect at the time of the 2025 determination.
Needs Assistance	A State's 2025 RDA Determination is Needs Assistance if the RDA Percentage is at least 60% but less than 80%. A State's determination would also be Needs Assistance if its RDA Determination percentage is 80% or above, but the Department has imposed Specific Conditions on the State's last three (FFYs 2022, 2023, and 2024) *IDEA* Part B grant awards, and those Specific Conditions are in effect at the time of the 2025 determination.
Needs Intervention	A State's 2025 RDA Determination is Needs Intervention if the RDA Percentage is less than 60%.
Needs Substantial Intervention	The Department did not make a determination of Needs Substantial Intervention for any State in 2025.

[15] In determining whether a State has met this 80% matrix criterion for a Meets Requirements determination, the Department will round up from 79.5% (but no lower) to 80%. Similarly, in determining whether a State has met the 60% matrix criterion for a Needs Assistance determination discussed below, the Department will round up from 59.5% (but no lower) to 60%.