



April 1st, 2026

U.S. Office of Management and Budget
Eisenhower Executive Office Building, Room 252
17th Street and Pennsylvania Avenue, NW
Washington, DC 20504

To Director Russell Vought and Associate Director Anne DeCesaro—

The undersigned members of the Collaboration to Promote Self-Determination (CPSD) and our allies write on behalf of the youth and adults with disabilities whom we serve. Our 55 organizations respectfully remind the Office of Management and Budget that Congress designed the Office of Special Education and Rehabilitative Services (OSERS)—including the Rehabilitation Services Administration (RSA) and Office of Special Education Programs (OSEP)—to operate *within* the Department of Education. Federal laws establish these deeply interconnected offices and entrust them with the oversight, implementation, and enforcement of key disability statutes

Any attempts to restructure the Department or its functions through interagency agreements (IAAs), whether actions to date or those anticipated in the future, raise significant legal and practical concerns, therefore running contrary to Congressional intent.

Founded in 2007, the Collaboration to Promote Self-Determination (CPSD) is an advocacy coalition of organizations including and representing people with disabilities, with a particular focus on those with intellectual/developmental disabilities (IDD), their families, the professionals who support them, and disability service agencies. CPSD advocates for comprehensive, innovative public policy reform that eliminates barriers to employment and financial security. Our goal is to promote opportunities for people with IDD to lead independent, self-determined lives in their communities.

The Department of Education Organization Act of 1979 establishes the existence of the Department of Education and its component offices, the functions of which fall exclusively under the Secretary of Education (20 U.S.C. §3417; 20 U.S.C. §3413; 20 U.S.C. § 3441 et seq). Congress has also reaffirmed in the most recent bipartisan appropriations process that the Department of Education does not have authority under numerous authorizing and appropriations laws to transfer its fundamental responsibilities to other agencies (Explanatory Statement regarding H.R. 7148 Consolidated Appropriations Act, 2026).

Moving OSEP and RSA to other federal agencies contradicts the requirements set forth under the Individuals with Disabilities Education Act (IDEA) and the Rehabilitation Act, which designate the Secretary of Education as the *only agency head responsible* for ensuring states and agencies meet the conditions and requirements under IDEA and the Rehab Act (20 U.S.C

§1402; 29 U.S.C. § 702(a)). The Department of Education is statutorily required to provide states with fiscal oversight, monitoring, compliance, provision of technical assistance, grants, and more (20 U.S.C. §1411(a)(1); 29 U.S.C. § 702(b)).

RSA and OSEP play critical roles in the lives of students and young adults with disabilities. RSA administers Vocational Rehabilitation and OSEP oversees the implementation of IDEA. Under their respective auspices, RSA and OSEP provide states with formula grants, performance accountability measures, and technical assistance to improve outcomes. RSA's placement within the Department of Education ensures that Vocational Rehabilitation (VR) programs coordinate with school systems to prepare disabled students with the training and services necessary to successfully move from K12 education to postsecondary education, competitive integrated employment (CIE), and community participation. In a similar vein, OSEP's placement in the Department of Education ensures that families have the right to meaningfully participate in educational decisions about their child with a disability, and that these students with disabilities get free and appropriate public education in the least restrictive environment with the accommodations they need. Coordinated oversight between federal education and workforce systems is thus necessary for the students and young adults with disabilities—particularly those with IDD—who benefit most from OSEP and RSA.

CPSD sent a letter expressing these concerns to the Senate HELP Committee and House Education & Workforce Committee on February 5th, 2026. We stand ready to work with OMB to ensure the Department of Education continues to serve people with disabilities.

CPSD and our allies continue to encourage a thoughtful, collaborative approach that maintains the integrity of the aforementioned programs and the statutory framework established by Congress. Part of this mutually-respectful collaboration is honoring that the disability advocacy community will not be coerced into “picking a poison”. There is neither a lawful nor constructive path to dismantling OSERS, OSEP, or RSA. Any such attempt to fragment these offices would have sweeping, long-term harms. Consequently, the Department of Education's cohesion is necessary for well-coordinated service delivery to, civil rights protections for, and the overall life-readiness of students with disabilities.

Should OMB have questions or like to meet virtually, please contact CPSD's co-chairs Nina Stoller (Nstoller@autisticadvocacy.org) and Stephanie Flynt McEben (Stephanie.McEben@ndrn.org).

Sincerely,

Collaboration to Promote Self-Determination (CPSD)

Allies for Independence

Applied Self-Direction

Association of Programs for Rural Independent Living (APRIL)

Autism Society of America

Autistic Self Advocacy Network (ASAN)

Center for Public Representation (CPR)
National Center for Learning Disabilities (NCLD)
National Disability Institute (NDI)
National Disability Rights Network (NDRN)
New Disabled South (NDS)
TASH

Partnered Allies

Access Ready Inc.
AFT: Education, Healthcare, Public Services
American Association of People with Disabilities (AAPD)
American Association of University Women (AAUW)
American Council of the Blind (ACB)
Autistic People of Color Fund
Caring Ambassadors Program
Children and Adults with Attention-Deficit/Hyperactivity Disorder
Clearinghouse on Women's Issues
Coalition on Human Needs
CommunicationFIRST
Congregation of Our Lady of Charity of the Good Shepherd, U.S. Region
Council for Exceptional Children
Council of Parent Attorneys and Advocates
Deaf Equality
Disability Belongs
Disability Law Center of Alaska
Disability Law Center of Utah
Disability Rights Education & Defense Fund
Disability Rights Florida
Disability Rights Iowa
Disability Rights Michigan
Disability Rights Nebraska
Disability Rights North Carolina
Disability Rights Ohio
Disability Rights South Carolina
Disability Rights Washington
EdTrust
Family Voices NJ
Feminist Majority Foundation
Georgia Advocacy Office
InControl Wisconsin
Just Solutions
Minnesota Disability Law Center
National Advocacy Center of the Sisters of the Good Shepherd
National Association of Social Workers

National Council on Independent Living (NICL)
National Education Association (NEA)
National Employment Law Center (NELP)
National Resource Center for Paraeducators, Related Service Providers, & Interveners
National Women's Law Center (NWLC)
North Dakota Protection & Advocacy Project
SPAN Parent Advocacy Network
The Advocacy Institute
The Center for Learner Equity
Women Employed

References

20 U.S. code §3417 “There shall be in the Department an Office of Special Education and Rehabilitative Services, to be administered by the Assistant Secretary for Special Education and Rehabilitative Services appointed under section 202(b).”

20 U.S.C. §3413 “There shall be in the Department an Office for Civil Rights, to be administered by the Assistant Secretary for Civil Rights appointed under section 202(b).”

20 U.S.C §1402 “There shall be, within the Office of Special Education and Rehabilitative Services in the Department of Education, an Office of Special Education Programs, which shall be the principal agency in the Department for administering and carrying out this chapter and other programs and activities concerning the education of children with disabilities.”

29 U.S.C. §702(a) “There is established in the Office of the Secretary in the Department of Education a Rehabilitation Services Administration ... Any reference in this chapter to duties to be carried out by the Commissioner shall be considered to be a reference to duties to be carried out by the Secretary of Education acting through the Commissioner.”

20 U.S.C. §1411(a)(1) “The Secretary shall make grants to States, outlying areas, and freely associated States, and provide funds to the Secretary of the Interior, to assist them to provide special education and related services to children with disabilities in accordance with this subchapter.”

29 U.S.C. § 702(b) “The Secretary of Education shall take whatever action is necessary to ensure that funds appropriated pursuant to this chapter are expended only for the programs, personnel, and administration of programs carried out under this chapter.”