

Congress of the United States

Washington, DC 20515

June 25, 2026

The Honorable Orice Williams Brown
Comptroller General of the United States
U.S. Government Accountability Office
441 G Street, Northwest
Washington, D.C. 20548

Dear Comptroller General Brown:

We write to ask that the Government Accountability Office (GAO) examine how states and local school districts are implementing post-secondary transition services for youth with disabilities served under the *Individuals with Disabilities Education Act* (IDEA) and the *Rehabilitation Act of 1973* (Rehab Act) as amended by Title IV of the *Workforce Innovation and Opportunity Act* (WIOA). Transition services are defined by law as a coordinated set of activities that support movement from school to post-school life,¹ representing one of the most consequential supports for determining long-term outcomes of youth with disabilities. While federal law has been amended over time to improve the quality of services provided in each state,² data continues to show that these services are inconsistently administered and insufficiently studied, leaving millions of students unprepared for life after high school.

As of 2023, approximately 7.6 million children aged 3 through 21 received special education services and supports under IDEA,³ with each child entitled to an Individualized Education Program (IEP) outlining these services alongside a transition plan. IDEA requires post-school transition services to begin for youth no later than age 16,⁴ and include objectives to prepare youth for employment, independent living, community participation, and/or to pursue a continuing education.⁵ Pre-employment transition services (pre-ETS) offered through vocational rehabilitation (VR) programs under the Rehab Act are intended to support transition planning and schools' provision of services. States are required to reserve at least 15 percent of funding for pre-ETS that include job exploration and post-secondary counseling, workplace readiness training, and instruction in self-advocacy to help eligible students with disabilities begin preparing for work,⁶ with permission to use any remaining funds towards supporting authorized activities.⁷

Despite decades of legal requirements, youth with disabilities continue to experience disproportionately poor post-secondary outcomes. Postsecondary attainment remains low for this population, with only 22 percent of adults with disabilities holding a bachelor's degree⁸ and the reported unemployment rate for people with

¹34 CFR § 300.43

²See ebrary.net, "Shifting Transition Requirements in the IDEA of 1990, 1998, and 2004," https://ebrary.net/307772/education/shifting_transition_requirements_idea_1990_1998_2004.

³See Congressional Research Service, "The Individuals with Disabilities Education Act (IDEA), Part B: Key Statutory and Regulatory Provisions," <https://crs.gov/Reports/R41833>.

⁴See U.S. Department of Education, *A Transition Guide to Postsecondary Education and Employment for Students and Youth with Disabilities*, <https://www.ed.gov/sites/ed/files/policy/speced/guid/idea/tb-second-trans.pdf>

⁵ 34 CFR § 300.43

⁶ See Rehabilitation Services Administration, "Pre-Employment Transition Services," <https://rsa.ed.gov/sub-regulatory-guidance/pre-employment-transition-services>.

⁷ 34 CFR § 361.48

disabilities being nearly double that of individuals without a disability.⁹ As research continues to confirm limited opportunities for youth without a high school diploma,¹⁰ 2021-22 findings show 15.6 percent of youth with disabilities dropping out of high school, 6.7 percent only receiving a certificate, and about 74 percent graduating with a regular diploma¹¹—a rate lower than economically disadvantaged students and well below the national average.¹² Disparities become even more jarring at the state level and across disability categories. In the same year, less than 50 percent of students with an intellectual disability or multiple disabilities graduated, with 49 percent of all students with disabilities graduating in New Jersey,¹³ starkly low in comparison to 71 percent in Vermont and 80 percent in Delaware.¹⁴

Current outcomes raise concerns about our nation’s response to preparing youth with disabilities for higher education and competitive integrated employment. It is a moral imperative that students with disabilities are prepared for life after high school to the same degree as their peers. Yet, the transition period marks a major shift in federal protections, which consequently, hold significant implications for student preparedness. IDEA guarantees services and supports for eligible children with disabilities through at least age 21. Whereas access to supports in college or in the workplace is governed by rights afforded under Section 504 of the Rehab Act and the *Americans with Disabilities Act* (ADA). Students with disabilities experience a service cliff as they transition from one system to another. In this transition, they must learn to navigate college classrooms or workplaces on their own—often with insufficient support. This includes self-disclosure with appropriate documentation and requesting accommodations.¹⁵ A previous GAO study on the role of federal agencies on student outcomes documents frequent reports from families who had trouble navigating eligibility rules and coordinating between multiple agencies to secure services for their children.¹⁶ Many experience service delays and struggle to communicate or negotiate accommodations for their needs, some lose access to supportive services after high school,¹⁷ and several face increased hardships in succeeding within post-secondary environments.¹⁸

Although current state reporting requirements include transition-related performance, with the percentage of youth receiving secondary transition services and general post-school outcomes related to education and

⁸ See U.S. Census Bureau, “Educational Attainment by Disability Status,” <https://data.census.gov/table/ACSST1Y2024.S1811?q=Disability&t=Educational+Attainment>.

⁹ See U.S. Bureau of Labor Statistics, “Persons with a Disability: Labor Force Characteristics,” <https://www.bls.gov/news.release/disabl.nr0.htm>.

¹⁰ See StriveTogether, *Cradle-to-Career Outcomes Data Guides: High School Graduation*, 2024, <https://www.strivetogether.org/wp-content/uploads/2024/08/StriveTogether-Cradle-to-Career-Outcomes-Data-Guides-High-School-Graduation.pdf>.

¹¹ See U.S. Department of Education, *46th Annual Report to Congress on the Implementation of the Individual with Disabilities Education Act (2024)*, <https://sites.ed.gov/idea/2024-annual-report-to-congress-on-the-individuals-with-disabilities-education-act-idea/>.

¹² See National Center for Education Statistics, “High School Graduation Rates,” <https://nces.ed.gov/programs/coe/indicator/coi/high-school-graduation-rates#fn17>.

¹³ See National Center for Education Statistics, “COE – High School Graduation Rates,” <https://nces.ed.gov/programs/coe/indicator/coi/high-school-graduation-rates#fn17>.

¹⁴ See U.S. Department of Education, “IDEA State Information,” <https://sites.ed.gov/idea/states/>.

¹⁵ See Congressional Research Service, “The Rights of Students with Disabilities Under the IDEA, Section 504, and the ADA,” <https://www.congress.gov/crs-product/R48068>

¹⁶ See U.S. Government Accountability Office, *Students with Disabilities: Better Federal Coordination Could Lessen Challenges in the Transition from High School*. <https://www.gao.gov/products/gao-12-594>.

¹⁷ See “Transition Services Research Article,” *PubMed Central*, <https://pubmed.ncbi.nlm.nih.gov/articles/PMC6546537/>.

¹⁸ See ADA National Network, “Higher Education and the ADA,” https://adata.org/research_brief/higher-education-and-ada.

employment included,¹⁹ there are no transition service specific data collection requirements under IDEA.²⁰ Current reporting simply provides national level insight into states' past and current post-secondary outcomes, with very little information on *how* states are implementing transition services and who are receiving them. Similarly, WIOA requires annual state performance reporting on core programs²¹ with VR state agencies reporting on the dollar expenditure for pre-ETS services.²² However, this expenditure is not provided as a percentage and the Rehabilitative Services Administration is not required to publish any consolidated report summarizing which states are meeting the 15 percent requirement, leaving the public and researchers with no easily accessible comparisons.²³ Further, statewide performance reports detailing measurable skill gains from general VR programming do not provide breakdowns of outcomes for pre-ETS specific programs.²⁴ The absence of transparent state-by-state reporting and oversight of statutory spending requirements attests to the need for GAO's review. A 2018 GAO study examining state practices in pre-ETS implementation remains one of the most accessible, public sources for state-level pre-ETS fiscal compliance and implementation.²⁵ Since the analysis, states have made efforts to spend more funding on pre-ETS. In 2018, less than half of states meet the 15 percent minimum, whereas in 2022, more than two-thirds have met the requirement.²⁶

Research also suggests high-quality transition services rely on factors that states and local school districts have historically faced challenges in meeting. Longstanding issues of access to pre-ETS prevent such services from reaching its full potential and Congress' intent for broader reach, with only about 295,000 students receiving pre-ETS out of an estimated 3.1 million who were eligible in 2023.²⁷ Further, many schools lack trained transition coordinators, with special education professionals often filling the role despite insufficient preparation and limited capacity.²⁸ As Congress continues to fail drastically in fully funding IDEA,²⁹ resource constraints also contribute to districts cutting costs to transition services and prematurely ceasing services. Emerging local examples already show some families losing access to transition programming before students demonstrate readiness. A bill introduced in Connecticut proposed to shorten the eligibility timeframe for services due to district funding limitations.³⁰ Relatedly, a district in Texas was reported by parents and community advocates

¹⁹ See U.S. Department of Education, "IDEA SPP/APR Indicator Analysis," <https://sites.ed.gov/idea/idea-spp-apr-indicator-analysis/>.

²⁰ 20 U.S. Code § 1418

²¹ Workforce Innovation and Opportunity Act, 2014, Pub. Law No. 113–128 § 128 STAT. 1476

²² See Rehabilitation Services Administration, "RSA-17 Submission Report." <https://rsa.ed.gov/data/view-submission-rsa-1->

²³ See Rehabilitation Services Administration, "VR Program Monitoring and Technical Assistance." https://rsa.ed.gov/about/programs/vocational-rehabilitation-state-grants/monitoring-of-vocational-rehabilitation-program?field_fiscal_year_value=2023&field_grantee_state_target_id=All&field_agency_type_value=All.

²⁴ <https://rsa.ed.gov/sites/default/files/publications/annual-reports/2024/ETA-9169-AnnualReport-PY2024-National.pdf>.

²⁵ See U.S. Government Accountability Office, *Students with Disabilities: Additional Information from Education Could Help States Provide Pre-Employment Transition Services*, <https://www.gao.gov/products/gao-18-502>.

²⁶ See Raise the Bar Initiative, "Pre-Employment Transition FY2021–2022 Dashboard,"

<https://public.tableau.com/app/profile/raisethebar/viz/Pre-EmploymentTransitionFY2021-2022/TransitionServices>

²⁷ See Jill Barshay, "Hundreds of Thousands of Students Are Entitled to Training and Help Finding Jobs. They Don't Get It," *The Hechinger Report* <https://hechingerreport.org/hundreds-of-thousands-of-students-are-entitled-to-training-and-help-finding-jobs-they-dont-get-it/>.

²⁸ See IRIS Center, "Transition Planning Resource," <https://iris.peabody.vanderbilt.edu/module/tran-ic/cresource/q1/p02/#content>.

²⁹ See National Education Association, "IDEA Funding Gaps in School Districts," <https://www.nea.org/resource-library/individual-disabilities-education-act-idea-funding-gaps-school-district>.

³⁰ See Jenna Carlesso, "Special Education Transition Services Clash in Connecticut," *CT Mirror*, <https://ctmirror.org/2025/03/21/ct-special-education-transition-services-clash/>.

for cutting students off from transition services before age 21 marking services as “complete” with some families citing their child's inability to perform basic independent living tasks without substantial support.³¹

Despite current limitations, existing research provides valuable insight on how transition services can be improved. One notable federally funded research study was Charting My Path for Future Success, with some 1,600 high school juniors enrolled across 13 school districts. Charting My Path aimed to assess the lasting impacts of transition services when support extends beyond basic federal compliance. The Institute of Sciences funded grant sponsoring Charting My Path supported small group goal setting, one-on-one mentoring, and family check-ins, but was ultimately cancelled by Elon Musk’s Department of Government Efficiency.³² Yet, parent, student, and educational staff testimony all cited notable improvements for student participants within just a few months of the program’s duration. This immediate impact draws previously veiled attention to the importance of targeted transition services while this administration’s termination of the initiative, among 88 other research projects,³³ underscores the need for alternative mechanisms to evaluate these services at the national level. Prior recommendations from the Department of Education have also stressed the importance of holistic transition services, citing early-college access through dual-enrollment partnership programs and structured skill-building opportunities as potentially valuable aspects of post-secondary readiness.³⁴ Continued research is imperative to constructing viable policy and evidence-based recommendations for improved transition services.

As a nation, we are witnessing the outcomes for students with disabilities when transition services are not readily available, minimally implemented, or under-resourced and researched. Given the persistent challenges and high-staked life-long impacts on outcomes, we respectfully request that GAO investigate the following questions:

1. How are states administering and documenting transition services under IDEA and pre-ETS?
 - a. How do practices vary at the state or district level? Particularly comparing states or districts with consistently low vs high graduation and post-school outcomes.
 - b.
2. What is the impact of pre-ETS and IDEA transition services? What state-specific IDEA transition services and pre-ETS policies, procedures, or partnerships contribute to these results?
 - a.

³¹See “Parents, Advocates Press Socorro ISD over Early Graduation and Transition Services for Students with Disabilities,” *Citizen Portal*, <https://citizenportal.ai/articles/6228145/Texas/Parents-advocates-press-Socorro-ISD-over-early-graduation-and-transition-services-for-students-with-disabilities>.

³² See Joseph Shapiro, “Trump, DOGE, and Students with Disabilities,” *NPR*, April 14, 2025, <https://www.npr.org/2025/04/14/nx-s1-5345870/trump-doge-students-disabilities>.

³³See Cory Turner, “Trump, Musk, Education Department, Schools, and Research Cuts,” *NPR*, February 10, 2025, <https://www.npr.org/2025/02/10/nx-s1-5292444/trump-musk-education-department-schools-students-research-cuts>.

³⁴ See U.S. Department of Education, *A Transition Guide to Postsecondary Education and Employment for Students and Youth with Disabilities*, Revised August 2020. <https://www.ed.gov/sites/ed/files/about/offices/list/osers/transition/products/postsecondary-transition-guide-08-2020.pdf>.

- b.
- 3.
- a.
 - b.
4. Since GAO's 2018 report, how has pre-ETS implementation changed and what gaps remain?
- a. Have states progressed in meeting the 15 percent pre-ETS requirement? What are student participation rates, including demographic disaggregation, for pre-ETS across states?
 - b. To what extent, are agencies using remaining funding towards authorized activities? What authorized activities are VR agencies engaged in to support students?
 - c.
5. Since GAO's 2012 report, how has the federal government improved coordination among the Departments of Education, Health and Human Services, and Labor, and the Social Security Administration related to transition services and activities?

We deeply appreciate GAO's previous work analyzing services that help students with disabilities transition from school to work and believe this inquiry would provide critical insight into how to raise expectations and improve post-school outcomes for students with disabilities nationwide.

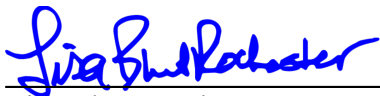
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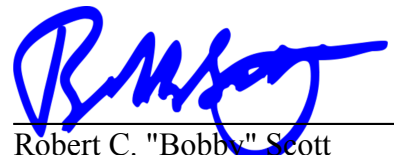
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Bernard Sanders
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