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**The Consortium for Constituents with Disabilities (CCD) Education and Employment and Training Task Forces strongly oppose the U.S. Department of Education's (ED) Interagency Agreements (IAAs) that transfers responsibilities from the Office of Special Education and Rehabilitative Services (OSERS) to the Department of Health and Human Services (HHS) and the Office for Civil Rights (OCR) to the Department of Justice (DOJ).**

Congress has assigned responsibility for administering the Individuals with Disabilities Education Act (IDEA), Section 504 of the Rehabilitation Act, the Rehabilitation Act's Vocational Rehabilitation (VR) program, and key federal education civil rights protections to the Department of Education. For nearly half a century, Congress has intentionally aligned educational access, transition services, workforce preparation, vocational rehabilitation, and civil rights enforcement within a single agency, recognizing that educational achievement and employment outcomes for individuals with disabilities are deeply interconnected.

Transferring OSERS to HHS moves critical education, transition, and employment programs into an agency primarily focused on health care and human services. OSERS oversees education for people with disabilities and the Vocational Rehabilitation program, which helps youth and adults with disabilities prepare for and obtain competitive integrated employment. On the ground, these programs are integrated into schools, career and technical education programs, postsecondary education, and workforce development systems. Segregating them to HHS weakens the coordinated approach Congress established to support individuals with disabilities from early intervention through employment. Further, this transfer risks overmedicalizing disability. The Social Model of disability, which fosters high expectations for students with disabilities, has propelled and influenced transition-aged youth and Pre-Employment Training Services (Pre-ETS), which are programs that help young adults achieve successful, competitive and integrated employment.

Similarly, transferring OCR to DOJ separates education-focused civil rights enforcement from the federal agency responsible for education policy and oversight. OCR provides specialized expertise in addressing discrimination in schools and ensuring students with disabilities receive the protections guaranteed under federal law.

These transfers will not simply relocate administrative functions; they will cause harm. They would fragment programs that Congress intentionally designed to work together, undermining coordination across education, civil rights, and employment systems. The CCD Education Task Force and Employment and Training Task Force urge policymakers to stop any effort to transfer OSERS to HHS or OCR to DOJ and instead preserve the integrated framework that supports educational opportunity, civil rights, workforce participation, and competitive integrated



employment for people with disabilities. If you have any questions, please contact one of the cochairs listed below.

**Education Task Force Co-Chairs**

Delancy Allred  
Autism Society  
[dallred@autismsociety.org](mailto:dallred@autismsociety.org)

Stephanie Flynt McEben  
National Disability Rights Network  
[stephanie.mceben@ndrn.org](mailto:stephanie.mceben@ndrn.org)

Lindsay Kubatzky  
National Center for Learning Disabilities  
[lkubatzky@ncld.org](mailto:lkubatzky@ncld.org)

Robyn Linscott  
The Arc of the United States  
[linscott@thearc.org](mailto:linscott@thearc.org)

Kuna Tavalin  
Council for Exceptional Children  
[ktavalin@exceptionalchildren.org](mailto:ktavalin@exceptionalchildren.org)

**Employment and Training Task Force Co-Chairs**

Mike Nagel  
The Arc of the United States  
[nagel@thearc.org](mailto:nagel@thearc.org)

Julie Christensen  
Association of People Supporting Employment  
First (APSE)  
[julie@apse.org](mailto:julie@apse.org)