NCPEID Clarification Statement: Physical Education is NOT a Related Service in IDEA

The purpose of this clarification statement is to provide accurate information to physical and special education teachers, PK-12 school administrators, related service professionals, parents, advocates, and others about misconceptions and misinterpretations of the Individuals with Disabilities Education Act (IDEA, 2004) requirement for physical education (PE) compared to related services.

IDEA unmistakenly describes PE as special education instruction, not a related service. Section 34 CFR § 300.39(a)(1) defines special education as "specially designed instruction, at no cost to the parents, to meet the unique needs of a child with a disability," including instruction in PE. Further, Section 34 CFR § 300.108(a) states that PE, specially designed if necessary, must be made available to every child with a disability receiving free and appropriate education. Section 34 CFR § 300.39(b)(2) defines this special education service as

- the development of physical and motor fitness;
- fundamental motor skills and patterns; and
- skills in aquatics, dance, and individual and group games and sports (including intramural and lifetime sports).
- Importantly, the regulations specify that PE includes special physical education, adapted physical education, movement education, and motor development.

Under IDEA, related services are defined in 34 CFR § 300.34(a) as "Transportation and such developmental, corrective, and other supportive services as are required to assist a child with a disability to benefit from special education." These services include, but are not limited to, speech-language pathology and audiology services, interpreting services, psychological services, physical therapy (PT), occupational therapy (OT), therapeutic recreation, early identification and assessment of disabilities in children, counseling services, orientation and mobility services, medical services for diagnostic or evaluation purposes, school health services and school nurse services, social work services in schools, and parent counseling and training. Since PE is not in this definition, school districts or states cannot describe, implement, or document PE as a related service.

The legal distinction between required PE as special education instruction and not a related service has been clarified by the United States Department of Education - Office of Special Education Programs (OSEP) via a published policy clarification letter (Letter to Tymeson, 2021). This OSEP statement noted that "when the IEP Team determines a child requires physical education as specially designed instruction to meet the unique needs of a child with a disability, the service is considered special education and not a related service" (Letter to Tymeson, 2021). Therefore, PT, OT, or other related services should not replace or be substituted for required PE. Nor should PE be referred to as a related service by local or state education agencies in the Individualized Education Program (IEP) process or other special education communications/materials. However, when appropriate, PE and related service

professionals should collaborate to meet the needs of students with disabilities. This interdisciplinary approach is a highly recommended and valuable evidence-based practice.

When the IEP team determines that a student needs specially designed instruction in PE, referred to in IDEA as adapted physical education, this special education service must appear and be described on the IEP. PE should be listed on the IEP as specially designed instruction with accompanying present levels of performance, goals and objectives, and progress monitoring, similar to all other special education content. As a special education service, this information should not be listed as a related service on the IEP. It should be described and be recorded as part of special education instructional services.

In summary and in accordance with IDEA, NCPEID reiterates that PE is special education instruction, not a related service for students with disabilities. Adapted or specially designed physical education should be listed on the IEP as a special education service with appropriate and challenging goals and other required information.

Additional Resources:
NCPEID APE Statement for Administrators
SHAPE America APE FAQ
SBPT APE Statement (2026)

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