

Disability Rights Iowa
HF 2218- Memorandum of Impact
February 12, 2026

Chairpersons and honorable members of the Committee. My name is Catherine E. Johnson. I am the Executive Director of Disability Rights Iowa. DRI is an independent, non-profit agency, which serves as the designated protection and advocacy system for people with disabilities in the state of Iowa, pursuant to federal mandates. The mission of the agency is to protect and advocate for the human and legal rights of Iowans with disabilities. I appear before you to share DRI's concerns regarding the impact of HF 2218 on the Disability Community.

Overview of HF 2218:

HF 2218 mandates that school districts install cameras in special education classrooms. The bill requires the video recording system be consistent with state and federal privacy laws, including the Family Educational Rights and Privacy Act (FERPA). The bill provides no new funding for implementation and enforcement of the proposed Act.

Potential Impact on Students with disabilities

HF 2218 is missing key details and information necessary to implement the practice of placing cameras in special education classrooms. These details are necessary to protect the privacy and educational rights of students with disabilities.

- HF 2218 does not expressly state that video recordings are part of a student's educational record and therefore subject to FERPA privacy requirements. Nor does HF 2218 state that they are confidential and not subject to Iowa's open records laws. This vulnerability may result in members of the public

with no connection to the students in the videos obtaining the recording of students with disabilities for use in whatever way they choose.

- HF 2218 does not define “special education classroom”, leaving it up to interpretation what areas of the building are subject to this mandate. It also contains no limitations on what areas of the special education classroom can or cannot be recorded, such as bathrooms or changing areas. Additionally, some students with disabilities engage in disrobing behaviors when dysregulated, and recording these occurrences would be highly inappropriate.
- HF 2218 contains no guidance regarding how the recordings may be used or retained by the school district, leaving open the possibility of impermissible and/or uses of the recordings that violate federal laws such as the Individuals with Disabilities Education Act.
- HF 2218 contains no guidance on the length, process for retention, storage, or destruction of the recordings.

Even if these details are added to HF 2218, the practice of placing cameras in special education rooms may still have negative and disproportionate impacts on students with disabilities.

- The vast majority of students with disabilities participate in the general education setting to some extent, and many for the majority of their school day. Placing cameras only in special education classrooms creates an inequitable dynamic that students with disabilities and their special education classrooms require heightened surveillance, while the general education setting does not.
- Students with disabilities are disproportionately subject to disciplinary actions, including the use of restraints, seclusion, suspensions, expulsions, and law enforcement involvement. Recordings of the student acting in ways that are a manifestation of their disability risks further subjecting them to an increase in disproportionate disciplinary actions and/or referrals to law enforcement.

- Parents and schools may feel that a student with a disability is safer in an area where there is video recording the activity in that space. By solely recording special education classrooms, HF 2218 may inappropriately and unintentionally incentivize keeping a student with disabilities in a more restrictive environment than is necessary to meet their needs. This could violate the least restrictive environment provision of the Individuals with Disabilities Education Act.
- HF 2218 provides no additional funding for school districts to implement what can be very costly recording systems. This diverts already limited resources away from supports and services that are necessary to provide a student with the free appropriate public education (FAPE) to which they are entitled. Cameras in special education classrooms do not provide students with disabilities the tools, resources, and education they need to be successful in school.

DRI Opposes HF 2218:

DRI strongly opposes this legislation. DRI urges legislators to thoughtfully consider the testimony submitted today, the concerns previously shared by parents and stakeholders, and to take time fully understand the impact of HF 2218 on students with disabilities. DRI requests that you vote against HF 2218. DRI welcomes the opportunity to discuss our concerns more in-depth with any member of the Iowa Legislature, Thank you in advance for your thoughtful deliberation of our testimony in opposition to HF 2218.