

Decision of the Colorado Department of Education
Under the Individuals with Disabilities Education Act (IDEA)

State-Level Complaint 2024:573
Denver Public Schools

DECISION

INTRODUCTION

On July 3, 2024, the parent (“Parent”) of a student (“Student”) identified as a child with a disability under the Individuals with Disabilities Education Act (“IDEA”)¹ filed a state-level complaint (“Complaint”) against Denver Public Schools (“District”). The Colorado Department of Education (“CDE”) determined that the Complaint identified two allegations subject to the jurisdiction of the state-level complaint process under the IDEA and its implementing regulations at 34 C.F.R. §§ 300.151 through 300.153. Therefore, the CDE has jurisdiction to resolve the Complaint.

RELEVANT TIME PERIOD

The CDE has the authority to investigate alleged noncompliance that occurred no earlier than one year before the date the Complaint was filed. 34 C.F.R. § 300.153(c). Accordingly, findings of noncompliance shall be limited to events occurring after July 3, 2023. Information prior to July 3, 2023 may be considered to fully investigate all allegations.

SUMMARY OF COMPLAINT ALLEGATIONS

The Complaint raises the following allegations subject to the CDE’s jurisdiction under 34 C.F.R. § 300.153(b) of the IDEA:

1. Failed to implement Student’s IEP from January 2024 to June 2024, in violation of 34 C.F.R. § 300.323, specifically by:
 - a. Failing to provide Student with the accommodations in his IEP, specifically by providing worksheets without a cover, not providing adapted paper, and denying access to a fidget; and
 - b. Failing to provide Student with the indirect occupational therapy services required by his IEP.

¹ The IDEA is codified at 20 U.S.C. § 1400, et seq. The corresponding IDEA regulations are found at 34 C.F.R. § 300.1, et seq. The Exceptional Children’s Education Act (“ECEA”) governs IDEA implementation in Colorado.

2. Failed to provide Parent with periodic reports on Student’s progress during the 2023-2024 school year, in violation of 34 C.F.R. § 300.320(a)(3).

FINDINGS OF FACT

After thorough and careful analysis of the entire Record,² the CDE makes the following findings of fact (“FF”):

A. Background

1. Student currently attends second grade at a District charter school (“School”). *Interview with Parents*. He also attended school for first grade during the 2023-2024 school year. *Id.*
2. Student is eligible for special education and related services under the disability category of Other Health Impairment. *Exhibit A*, p. 52.
3. Student is a creative, energetic young man with a big imagination. *Interviews with Case Manager and Parents*. He loves animals and wants to be a wildlife conservationist when he grows up. *Interview with Parents*. At school, Student struggles with sensory regulation and has some challenges with reading and math. *Interviews with Case Manager and Parents*.

B. Student’s IEPs

4. During Spring 2024, the District implemented four different IEPs for Student due to his annual review and subsequent revisions. *Response*, p. 3; *Exhibit A*, pp. 1-72. For brevity, the Findings of Fact only include the portions of those IEPs at issue in this investigation.
5. On January 23, 2024, the District convened Student’s IEP Team to complete his annual IEP review. *Interview with Case Manager*. That meeting resulted in an IEP dated January 23, 2024 (“January 2024 IEP”). *Exhibit A*, pp. 1-15.
6. The January 2024 IEP contained twenty accommodations broken down into five categories. *Id.* at pp. 24-25. Of the four accommodations at issue in this investigation, only two were included in the January 2024 IEP. *Id.* Those two accommodations include:
 - Opportunity for Student’s teachers to “consult with school-based OT to review and monitor the effectiveness of sensory strategies”, and
 - Access to a fidget.

Id.

² The appendix, attached and incorporated by reference, details the entire Record.

7. The January 2024 IEP did not require any occupational therapy services. *Id.* at p. 27. Instead, the January 2024 IEP included both direct and indirect speech/language services, as well as direct psychological services. *Id.*
8. Student's IEP Team reconvened on March 5, 2024, to discuss Parents' concerns regarding Student's OT needs. *Exhibit F*, p. 3; *Exhibit A*, p. 49. That meeting resulted in an IEP dated March 5, 2024 ("March 2024 IEP"). *Exhibit A*, pp. 30-49.
9. During the March 2024 meeting, the IEP Team added more accommodations to Student's IEP. *Id.* at pp. 41-42. The relevant accommodations included:
 - Three-lined adapted paper for organization of written work,
 - "Reduc[ing] visual distractions on worksheets by using a blank piece of paper to cover all but the current question being worked on",
 - Opportunity for Student's teachers to "consult with school-based OT to review and monitor the effectiveness of sensory strategies", and
 - Access to a fidget.

Id.

10. Based on a recent occupational therapy evaluation, the IEP Team determined that Student needed occupational therapy services. *Id.* at p. 46. The March 2024 IEP required the District to provide Student with the following OT services:
 - 90 minutes per month of direct occupational therapy outside the general education classroom targeting fine motor skills, and
 - 120 minutes per year of indirect occupational therapy services to address "sensory processing differences that may impact his ability to perform in the classroom."

Id.

11. Student's IEP Team convened for a third time on May 9, 2024. *Id.* at pp. 52-72. That meeting resulted in an IEP dated May 9, 2024 ("May 2024 IEP"). *Id.*
12. The May 2024 IEP noted that Student was "learning to use double-lined adaptive paper which appears to be helping with letter formation and sizing. This has been provided to his teacher as well." *Id.* at p. 58.
13. None of the accommodations at issue in this investigation were altered in or removed from the May 2024 IEP. *See id.* at pp. 64-65.

14. Student's occupational therapy services remained unchanged in the May 2024 IEP. *Id.* at pp. 67-68.
15. Under each IEP, Student spent at least 80% of the time in the general education classroom. *Id.* at pp. 14, 47, 69.

C. Implementation of Student's Accommodations

16. Before the 2023-2024 school year began, Case Manager met with Student's teachers and related service providers to review Student's IEP. *Interview with Case Manager*. All attendees were provided a copy of Student's IEP snapshot and had the opportunity to ask clarifying questions about Student's accommodations. *Id.*
17. Student's teachers and related service providers attended IEP Team meetings held during the 2023-2024 school year and helped develop his accommodations. *Id.* As a result, they were aware of those accommodations. *Id.*
18. Parent's Complaint questioned the implementation of four accommodations during Spring 2024, specifically: use of adapted paper, use of a cover on worksheets to reduce visual distractions, access to a fidget, and the opportunity for Student's teachers to consult with an OT. *Complaint*, pp. 1-14. One of the accepted allegations concerns the provision of Student's indirect occupational therapy services; however, Parents clarified that their concern relates to implementation of the accommodation requiring an opportunity for occupational therapy consultations. *Interview with Parents; Parent's Reply*, p. 1. Therefore, the state complaints officer ("SCO") has analyzed implementation of the accommodation only.
19. During Spring 2024, Parents asked the District whether these accommodations were being implemented. *Interview with Parents*. To address Parents' concerns, District staff performed a "Fidelity Check" in May 2024 to show Parents when the accommodations were being implemented and by whom. *Interview with Case Manager; Exhibit D*, pp. 4-7.
20. Beginning on March 5, 2024, Student's IEPs required the use of three-lined adapted paper as an accommodation. *Exhibit A*, p. 41. According to the Fidelity Check, Occupational Therapist implemented Student's adapted paper accommodation. *Exhibit D*, pp. 4-7. Occupational Therapist noted that she had "provided adaptive paper and continue[d] to trial different types – currently like double lined." *Id.* at p. 5.
21. Additionally, Occupational Therapist's service log indicated that she used doubled-lined adapted paper with Student on April 30, 2024. *Id.* at p. 2. This was the first entry related to adapted paper during the 2023-2024 school year. *Id.* at pp. 1-3. Occupational Therapist continued to explore adapted paper with Student on May 14, 2024: "[Student] then copied one sentence and a phrase using adaptive paper. [Student] is showing great improvement with use of adaptive paper." *Id.* at p. 2. The Record does not indicate whether adapted paper was ever provided to First Grade Teacher for use in the classroom, though Parents recalled

that Student's end-of-year project was not on adapted paper. *Interview with Parents*. Occupational Therapist and First Grade Teacher no longer work at School or in the District and were unable to be reached for interviews. *Exhibit I*, p. 1.

22. As of March 5, 2024, Student's IEPs also specified that the District provide Student a blank piece of paper to "[r]educ[e] visual distractions on worksheets by . . . cover[ing] all but the current question being worked on." *Exhibit A*, p. 41. First Grade Teacher was responsible for providing Student the cover for worksheets. *Exhibit D*, p. 5. The District's Fidelity Check indicated this accommodation had been implemented but also stated: "There has not been a need for this yet but can easily be implemented when worksheets with visual distractions are used." *Id.* Parents understood that the cover would be available for all worksheets without First Grade Teacher determining whether it was necessary or whether the worksheets were visually distracting to Student. *Interview with Parents*.
23. As early as January 2024, Student's IEPs required Student to have access to fidgets. *Exhibit A*, pp. 24-25. The Fidelity Check indicated Occupational Therapist and First Grade Teacher oversaw Student's access to fidgets. *Exhibit D*, p. 6. Per the Fidelity Check, this accommodation had been "partially implemented": "[Student] has had access to a flexible chew bracelet and attempts have been made at implementing other fidgets." *Id.*
24. According to Case Manager, fidgets were initially previewed with Student by Occupational Therapist and trialed in sessions with the School Psychologist. *Interview with Case Manager*. Case Manager recalled School staff trying putty, a stretchy animal with spikes on it, and an arm band. *Id.* Student used all these fidgets as toys. *Id.* For example, Student pretended the stretchy animal had magic powers and flung it across the room. *Id.* Case Manager felt this accommodation was only partially implemented because staff could not identify a good fidget for him. *Id.*
25. Throughout the relevant time period, Student's IEPs identified the opportunity for Student's teachers to consult with Occupational Therapist as an accommodation. *Exhibit A*, pp. 24-25, 41-42, 64-65. The Fidelity Check reported that this accommodation was implemented by Occupational Therapist and noted that she discussed Student's sensory needs with First Grade Teacher and Adventure Coordinator. *Id.* The accommodation did not require any specific amount of consultation, only that Student's teachers have the opportunity to consult with Occupational Therapist. *Id.* Nothing in the Record suggests Student's teachers were, in any way, prevented from exercising this option. Case Manager recalled First Grade Teacher and School Psychologist reaching out to Occupational Therapist regarding Student's sensory needs. *Interview with Case Manager*.

D. Progress Reports

26. Each of Student's IEPs required progress reports to be provided "in alignment with school report cards." *Exhibit A*, pp. 8, 21, 39, 62. School issues report cards twice per school year—once in February and once in June. *Interview with Case Manager; Response*, p. 4. School mails

hard copies of students' progress reports along with their report cards. *Interview with Case Manager*.

27. School did not provide Parent a progress report in February 2024. *See Response*, p. 4; *Exhibit B*, pp. 1-74; *Interview with Parents*. The District argued no progress report was provided due to the IEP Team meeting held on January 23, 2024. *Response*, p. 4. According to the District, a February progress report would have been "without value" due to the creation of new annual goals at the January IEP Team meeting. *Id.*
28. Additionally, the District asserted that Parent was informed of Student's progress on his annual goals during the January 2024 IEP Team meeting. *Id.* Parents did not recall staff members reviewing Student's progress during the meeting, though Parents acknowledged that the information was contained in the IEP. *Interview with Parents*; *see Exhibit A*, pp. 5-6.
29. The January 2024 IEP summarized Student's progress on his annual goals since February 2023. *Exhibit A*, p. 5. The summary contained both objective statements describing Student's progress and subjective statements without any supporting data points. *Id.* at pp. 5-6. Student met Goal 1 and one of its objectives; the commentary on the other objective indicated Student had made progress but did not contain any supporting data. *Id.* at p. 5. Goal 2 contained both data and a narrative detailing on Student's progress. *Id.* at p. 5. Goals 3 and 4 included some commentary for the goal and related objectives but no supporting data. *Id.* at pp. 5-6.
30. In June 2024, Parents received Student's end-of-year progress report. *Interview with Parents*; *Exhibit B*, pp. 39-45; *Response*, p. 4. Goals 1 and 2 contained data and a narrative statement regarding Student's progress toward the individual goals, though there was no data for the related objectives. *Exhibit B*, pp. 39-40. Goal 3 contained no data other than the baseline and no commentary regarding Student's progress. *Id.* at pp. 41-45.

CONCLUSIONS OF LAW

Based on the Findings of Fact, the CDE enters the following CONCLUSIONS OF LAW:

Conclusion to Allegation No. 1: The District did not fully implement Student's IEP, as required by 34 C.F.R. § 300.323(c)(2). The noncompliance did not result in a denial of FAPE.

Parent's Complaint alleges that the District did not provide Student certain accommodations required by his IEP during Spring 2024.

A. Legal Requirements for IEP Implementation

The IDEA seeks to ensure that all children with disabilities receive a FAPE through individually designed special education and related services pursuant to an IEP. 34 C.F.R. § 300.17; ECEA Rule 2.19. The IEP is "the centerpiece of the statute's education delivery system for disabled children . . . [and] the means by which special education and related services are 'tailored to the unique

needs' of a particular child." *Andrew F. ex rel. Joseph F. v. Douglas Cty. Sch. Dist. RE-1*, 137 S. Ct. 988, 994 (2017) (quoting *Honig v. Doe*, 484 U.S. 305, 311 (1988); *Bd. of Ed. v. Rowley*, 458 U.S. 176, 181 (1982)). A student's IEP must be implemented in its entirety. 34 C.F.R. § 300.323(c)(2).

A school district must ensure that "as soon as possible following the development of the IEP, special education and related services are made available to a child in accordance with the child's IEP." *Id.* § 300.323(c)(2). To satisfy this obligation, a school district must ensure that each teacher and related services provider is informed of "his or her specific responsibilities related to implementing the child's IEP," as well as the specific "accommodations, modifications, and supports that must be provided for the child in accordance with the IEP." *Id.* § 300.323(d).

B. Accessibility of Student's IEP to Teachers

The SCO must first determine whether the District satisfied its obligation under 34 C.F.R. § 300.323(d). Here, Case Manager met with Student's teachers and related service providers at the beginning of the school year to discuss the requirements of Student's IEP. (FF # 16.) His teachers and related service providers attended IEP Team meetings during the school year and helped to develop his accommodations. (FF # 17.) Accordingly, they were informed of Student's accommodations. (*Id.*) For these reasons, the SCO finds and concludes that the District complied with 34 C.F.R. § 300.323(d).

C. Accommodations

Based on the Findings of Fact, the SCO finds and concludes that the District implemented two of the four accommodations—access to fidgets and an opportunity to consult with Occupational Therapist—at issue in this investigation. The SCO finds and concludes that the other two accommodations at issue— adapted paper and a cover for worksheets—were not properly implemented.

Access to Fidgets and Opportunity to Consult with Occupational Therapist

First, with regard to fidgets, School staff trialed several potential fidgets with Student during Spring 2024. (FF #s 23-24.) Despite these attempts, School staff were unable to identify a fidget that met Student's needs and was not used as a toy. (*Id.*) Even though School staff were unsuccessful, their attempts were sufficient to allow the SCO to find and conclude that the District implemented this accommodation.

As for the consultations, Student's IEPs only required that his teachers be given an opportunity to consult with Occupational Therapist regarding Student's sensory strategies. (FF #s 6, 9, 13, 25.) The accommodation did not require any consultations to actually occur. (*Id.*) The Findings of Fact show that Occupational Therapist consulted with, at least, First Grade Teacher and Adventure Coordinator. (FF # 25.) Parents wish Occupational Therapist had consulted with more members of Student's team; however, the accommodation did not require anything more than the

opportunity. (*Id.*) Nothing in the Record indicates that any of Student’s teachers or service providers were denied an opportunity to consult with Occupational Therapist. (*Id.*) For these reasons, the SCO finds and concludes that the District implemented this accommodation.

Adapted Paper

According to the Record, Occupational Therapist first offered Student adapted paper on April 30, 2024—nearly two months after the accommodation was added to Student’s IEP. (FF # 21.) Even then, Occupational Therapist used double-lined paper instead of the three-lined paper required by both the March 2024 and May 2024 IEPs. (FF #s 9, 21.) Finally, nothing in the Record shows that Student had access to adapted paper in the classroom. (FF # 21.) For these reasons, the SCO finds and concludes that the District did not fully implement Student’s adapted paper accommodation and, as a result, did not comply with 34 C.F.R. § 300.323(d).

Cover Sheets

First Grade Teacher acknowledged in the Fidelity Check that he had not provided Student a cover for worksheets. (FF # 22.) First Grade Teacher indicated a cover could be provided when it became necessary, suggesting he had already determined that Student did not need this accommodation during the 2023-2024 school year. (*Id.*) As a result, the SCO finds and concludes that the District did not implement the cover sheet accommodation and, as a result, did not comply with 34 C.F.R. § 300.323(d).

D. Materiality of Noncompliance

Where the definition of a FAPE specifically references delivery of special education and related services consistent with an IEP, the failure to implement an IEP can result in a denial of a FAPE. 34 C.F.R. § 300.17; ECEA Rule 2.19. Not every deviation from an IEP’s requirements results in a denial of FAPE. Only the failure to implement a “material,” “essential,” or “significant” provision of a student’s IEP amounts to a denial of a FAPE. *See, e.g., Van Duyn ex rel. Van Duyn v. Baker Sch. Dist. 5J*, 502 F.3d 811, 822 (9th Cir. 2007) (concluding consistent with “sister courts . . . that a material failure to implement an IEP violates the IDEA”); *Neosho R-V Sch. Dist. v. Clark*, 315 F.3d 1022, 1027 (8th Cir. 2003) (holding that failure to implement an “essential element of the IEP” denies a FAPE); *Houston Indep. Sch. Dist. v. Bobby R.*, 200 F.3d 341, 349 (5th Cir. 2000) (ruling that failure to implement the “significant provisions of the IEP” denies a FAPE). “A material failure occurs when there is more than a minor discrepancy between the services a school provides to a disabled child and the services required by the child’s IEP.” *Van Duyn*, 502 F.3d at 822.

Here, the District neglected to implement two of the accommodations required by Student’s IEP. Each of these accommodations was added to Student’s IEP on March 5, 2024. (FF # 9.) As such, the noncompliance spanned only a three-month period of the 2023-2024 school year. (*Id.*) Student’s IEPs all contained twenty or more accommodations. (FF #s 6, 9, 13.) These two accommodations—when considered individually or together—did not constitute a material or

essential element of Student's IEPs. Therefore, the SCO finds and concludes that the District's noncompliance did not result in a denial of FAPE.

Conclusion to Allegation No. 2: The District did not provide Parent with periodic reports on Student's progress during the 2023-2024 school year, as required by 34 C.F.R. § 300.320(a)(3)(ii). The noncompliance did not result in a denial of FAPE.

The second allegation in Parent's Complaint concerns Student's progress monitoring during the 2023-2024 school year. Parent asserted that the District did not provide her with any progress reports until June 2024.

A. Student's Progress Reports

The IDEA requires school districts to provide periodic reports on the progress a student is making towards the student's annual goals. 34 C.F.R. § 300.320(a)(3).

As the Findings of Fact demonstrate, the District did not adequately monitor Student's progress. The progress monitoring included in the January 2024 IEP and the progress report sent home in June 2024 both lacked sufficient data and information to allow Parent to ascertain the rate and level of Student's progress. (FF #s 28-30.) For this reason, the SCO finds and concludes that the District did not provide Parent with adequate reports on Student's progress in Spring 2024, as required by 34 C.F.R. § 300.320(a)(3)(ii). This resulted in procedural noncompliance with the IDEA.

B. Impact of the Procedural Noncompliance

The United States Supreme Court has stressed the importance of complying with the IDEA's procedural requirements. *Bd. of Educ. v. Rowley*, 458 U.S. 176, 205-06 (1982). However, noncompliance with a procedural requirement amounts to a denial of FAPE only if the procedural noncompliance: (1) impeded the child's right to a FAPE, (2) significantly impeded the parent's opportunity to participate in the decision-making process, or (3) caused a deprivation of educational benefit. 34 C.F.R. 300.513(a)(2).

Here, the District did not adequately track Student's progress on his annual goals for one semester of the 2023-2024 school year. (FF #s 28-30.) Although progress monitoring would have allowed Parent to better understand how Student was doing at School, Parent was not completely in the dark. Parent had at least some information from the progress monitoring she did receive, and the District convened Student's IEP Team three times during Spring 2024 at Parent's request. (FF #s 5, 8, 11, 28-30.) For these reasons, the SCO finds and concludes that the District's procedural noncompliance did not significantly impede Parent's right to participate in the decision-making process. The noncompliance also had no impact on Student's right to a FAPE or the educational benefit he received. Thus, no denial of FAPE occurred.

Systemic IDEA Noncompliance: This investigation does not demonstrate noncompliance that is systemic in nature and likely to impact the future provision of services for all children with disabilities in the District if not corrected. 34 C.F.R. § 300.151(b)(2).

Pursuant to its general supervisory authorities, the CDE must also consider and ensure the appropriate future provision of services for all IDEA-eligible students in the district. 34 C.F.R. § 300.151(b)(2). Indeed, the U.S. Department of Education has emphasized that the state complaint procedures are “critical” to the State Enforcement Agency’s “exercise of its general supervision responsibilities” and serve as a “powerful tool to identify and correct noncompliance with Part B.” *Assistance to States for the Education of Children with Disabilities and Preschool Grants for Children with Disabilities*, 71 Fed. Reg. 46601 (Aug. 14, 2006).

Here, the noncompliance appeared to stem from a lack of communication and execution by Student’s teachers, related service providers, and Case Manager. The Record does not suggest that this noncompliance extended beyond Student. Accordingly, the SCO finds and concludes that the District’s noncompliance was isolated and not systemic.

REMEDIES

The CDE concludes that the District did not comply with the following IDEA requirements:

1. Implementing Student’s IEP between January 2024 to June 2024, as required by 34 C.F.R. § 300.323.
2. Providing Parent with periodic reports on Student’s progress during the 2023-2024 school year, as required by 34 C.F.R. § 300.320(a)(3)(ii).

To demonstrate compliance, the District is ORDERED to take the following actions:

1. Corrective Action Plan

- a. By **Friday, September 27, 2024**, the District shall submit to the CDE a corrective action plan (“CAP”) that adequately addresses the noncompliance noted in this Decision. The CAP must effectively address how the cited noncompliance will be corrected so as not to recur as to Student and all other students with disabilities for whom the District is responsible. The CDE will approve or request revisions that support compliance with the CAP. Subsequent to approval of the CAP, the CDE will arrange to conduct verification activities to confirm the District’s timely correction of the areas of noncompliance.

2. Final Decision Review

- a. Director of Special Education, Senior Manager of Special Education (Charter Schools), Special Education Instructional Specialist (Charter Schools), Case Manager, and all of Student’s teachers and related service providers must review

this Decision, as well as the requirements of 34 C.F.R. §§ 300.320(a)(3)(iii) and 300.323. This review must occur no later than **Friday, October 18, 2024**. A signed assurance that these materials have been reviewed must be completed and provided to the CDE no later than **Wednesday, October 23, 2024**.

Please submit the documentation detailed above to the CDE as follows:

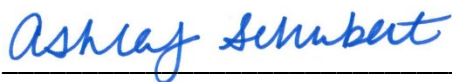
Colorado Department of Education
Exceptional Student Services Unit
Attn.: CDE Special Education Monitoring and Technical Assistance Consultant
201 E. Colfax Avenue
Denver, CO 80203

NOTE: If the District does not meet the timelines set forth above, it may adversely affect the District's annual determination under the IDEA and subject the District to enforcement action by the CDE.

CONCLUSION

The Decision of the CDE is final and is not subject to appeal. *CDE State-Level Complaint Procedures*, 13. If either party disagrees with this Decision, the filing of a Due Process Complaint is available as a remedy provided that the aggrieved party has the right to file a Due Process Complaint on the issue with which the party disagrees. *CDE State-Level Complaint Procedures*, 13; *See also* 34 C.F.R. § 300.507(a); *71 Fed. Reg. 156, 46607* (August 14, 2006). This Decision shall become final as dated by the signature of the undersigned SCO.

Dated this 30th day of August, 2024.



Ashley E. Schubert
State Complaints Officer

APPENDIX

Complaint, pages 1-14

- Exhibit 1: Email correspondence
- Exhibit 2: Email correspondence
- Exhibit 3: Email correspondence
- Exhibit 4: Email correspondence
- Exhibit 5: Email correspondence
- Exhibit 6: Email correspondence

Response, pages 1-5

- Exhibit A: IEPs
- Exhibit B: Progress monitoring
- Exhibit C: Student's attendance
- Exhibit D: Service logs and Fidelity Check
- Exhibit E: Prior Written Notices
- Exhibit F: Notices of Meeting
- Exhibit G: District policies and procedures
- Exhibit H: Email correspondence
- Exhibit I: List of staff with knowledge
- Exhibit J: Eligibility determination documents

Reply, pages 1-3

- Exhibit 7: Email correspondence
- Exhibit 8: Prior Written Notices
- Exhibit 9: Evaluation documents
- Exhibit 10: Eligibility determination documents
- Exhibit 11: IEPs

Telephone Interviews

- Case Manager: August 15, 2024
- Parents: August 19, 2024
- Senior Manager of Special Education (Charter Schools): August 14, 2024