

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

State Complaint SC2025-577
Jefferson County Public Schools

DECISION

INTRODUCTION

On June 11, 2025, 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 complaint (“Complaint”) against Jefferson County Public Schools (“District”). The Colorado Department of Education (“CDE”) determined that the Complaint identified one allegation subject to its jurisdiction for the state-level complaint process under the IDEA and its implementing regulations at 34 C.F.R. §§ 300.151 through 300.153.

The CDE’s goal in state complaint investigations is to improve outcomes for students with disabilities and promote positive parent-school partnerships. A final written decision serves to identify areas for professional growth, provide guidance for implementing IDEA requirements, and draw on all available resources to enhance the quality and effectiveness of special education services.

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 properly filed. 34 C.F.R. § 300.153(c). Accordingly, findings of noncompliance shall be limited to events occurring after June 11, 2024. Information prior to that date may be considered to fully investigate all allegations.

SUMMARY OF COMPLAINT ALLEGATIONS

The Complaint raises the following allegation subject to the CDE’s jurisdiction under 34 C.F.R. § 300.153(b)² of the IDEA:

1. District did not fully implement Student’s Individualized Education Program (“IEP”) from March 2025 through the end of the 2024-2025 school year because it:

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 The CDE’s state complaint investigation determines if District complied with the IDEA, and if not, whether the noncompliance results in a denial of a free appropriate public education (“FAPE”). 34 C.F.R. §§ 300.17, 300.101, 300.151-300.153.

- a. Did not make the IEP accessible to teachers or service providers responsible for its implementation, as required by 34 C.F.R. § 300.323(d); and
- b. Did not educate Student in the least restrictive environment listed in the IEP—specifically by removing Student from the general education setting—as required by 34 C.F.R. §§ 300.320(a)(5), 300.323(c).

FINDINGS OF FACT

After thorough and careful analysis of the entire Record,³ the CDE makes the following findings of fact (“FF”):

A. Background

1. Student is 12 years old and attends a District K-8 school (“School”) in fifth grade. *Exhibit A*, p. 1. He qualifies for special education and related services under the disability category of Other Health Impaired. *Id.*
2. Student is very bright, athletic, and creative. *Interviews with Parent, School’s Social Worker (“Social Worker”), Student’s Special Education Teacher (“Teacher”), and District’s Assistant Director of Special Education (“Assistant Director”).* He is enthusiastic in school and loves to learn. *Id.* His interests include animals, cars, and playing guitar. *Id.*
3. This investigation concerns the implementation of an IEP (the “IEP”) from March 1, 2025 through the end of the 2024-2025 school year. *Exhibit A*. The IEP is dated October 15, 2024, and was in effect from November 20, 2024 through May 15, 2025. *Id.* at pp. 43-61.

B. District’s Practices, Policies and Procedures

4. Assistant Director described District’s responsibilities under the IDEA, stating that District staff are required to remain attentive to students’ needs to ensure that each student receives a FAPE. *Interview with Assistant Director.*
5. District works to ensure that all staff remain knowledgeable regarding their duty to comply with relevant special education laws, including by offering professional development sessions and holding frequent check-in meetings to discuss issues arising through the course of educational work. *Id.*
6. District provides its special education staff with written materials outlining their responsibilities under the law, including copies of the CDE’s “IEP Procedural Guidance,” which discusses in detail the requirements for properly serving students with disabilities. *Exhibit I.*

³ The appendix, attached and incorporated by reference, details the entire Record.

7. Assistant Director stated that when a student's IEP is developed or amended, the student's case manager is responsible for contacting staff responsible for implementing the IEP to ensure that they understand the document and are prepared to deliver services and accommodations as needed. *Interview with Assistant Director.*
8. Assistant Director stated that District directs its staff members to implement student IEPs with fidelity to the IEP document, while monitoring outcomes to ensure that the IEP remains tailored to the student's needs. *Id.*

C. Accessibility of Student's IEPs

9. Teacher, who is Student's case manager, and Social Worker stated that they met with all teachers working with Student prior to the start of the 2024-2025 school year to review Student's IEP and BIP and ensure that any questions related to implementation of the document were answered. *Interviews with Teacher and Social Worker.*
10. Following that meeting, Social Worker emailed copies of the IEP, including Student's BIP, to all relevant staff members, and delivered printed copies to those teachers who requested a hard copy. *Interview with Social Worker.* In addition, Student's IEP and BIP were uploaded to a shared Google Drive folder that appropriate staff could access when needed. *Interviews with Teacher and Social Worker.*
11. Teacher and Social Worker described undertaking a similar process following the development of the IEP in October and November 2024, the amendment of the IEP in March 2025, and the development of a revised IEP (the "Revised IEP") in April and May 2025 that was in effect from May 15, 2025 to present. *Id.*

D. The IEP

12. The IEP documents Student's present levels of educational performance, describing his strengths and interests, the results of recent evaluations and assessments, and the input of his teachers. *Id.* at pp. 46-50.
13. The IEP describes Student's needs and the impact of his disability, noting that Student struggles with attention and completion of non-preferred tasks. *Id.* at p. 51. IEP 1 includes input from Parent. *Id.*
14. The IEP notes that Student requires a behavior intervention plan ("BIP"). *Id.* at p. 51.
15. The IEP contains three annual goals, one each in the areas of social/emotional wellness, self-determination, and mathematics. *Id.* at pp. 51-53.
16. The IEP identifies 36 accommodations necessary for Student to access general education, including an accommodation which reads: "Morning check-ins with a trusted adult." *Id.* at pp. 54-55.

17. The IEP describes the specialized instruction and related services that Student will receive, detailing that Student’s direct services include 210 minutes per week of specialized instruction inside the general education classroom and 50 minutes per month of mental health services outside the general education classroom. *Id.* at p. 57. In addition, following an IEP amendment dated March 26, 2025, the IEP requires an additional 130 minutes per month of direct mental health services inside the general education classroom. *Id.*
18. The IEP describes Student’s placement in the least restrictive environment (“LRE”), stating that Student will spend 99.4% of the time in the general education setting. *Id.* at p. 58.
19. The IEP was amended following a properly constituted meeting on March 26, 2025. *Id.* at p. 41. This amendment added 130 minutes per month of direct mental health services inside the general education classroom and made several small revisions to Student’s BIP. *Id.* at pp. 41-42.
20. The IEP includes a BIP (“BIP”), which outlines strategies for avoiding the onset of problem behaviors, promoting the use of appropriate replacement behaviors, and addressing problem behaviors should they occur. *Id.* at pp. 29-37, 86-94.
21. The BIP identifies targeted problem behaviors as classroom disruption behaviors, non-cooperative behaviors, and physical aggression. *Id.* at pp. 29-30, 86-87.
22. Strategies outlined in the BIP that are relevant to this investigation include:
 - “Allow a soft start to address any basic needs and allow time for regulation, if needed.”
 - “Consider allowing more break opportunities, especially in the morning time.”
 - “Allow a rest time if family communicates lack of sleep that night.”
 - “A morning check-in should include needs such as food and rest, emotions and self-regulation [...]”
 - “1 break request is allowed per class period [...],” with use of a timer to structure the break.
 - Staff working with Student should teach and reinforce replacement behavior skills including “Functional communication to request an ‘escape’: ask for help, to go to quiet area (outside classroom), to take a break (break card).”

Id. at pp. 87-91.

E. Student’s Participation in the General Education Classroom

23. Student's daily class schedule at School during the 2024-2025 school year ran from 8:00 a.m. to 3:15 p.m., spanning 435 minutes per day. *CDE Exhibit 1*.
24. Student's schedule called for him to be in the general education setting throughout his day, except for 50 minutes per month of pull-out mental health services. *Exhibit A*, p. 57; *Exhibit J*, pp. 5-10. Student's specialized instruction services were provided to him by special education teachers, including Teacher, who supported Student on an individual basis in his various classes. *Interview with Teacher; Exhibit J*, pp. 5-10.
25. Each morning during the time the IEP was in effect, Student would, as provided in his accommodations, start his day by meeting with Social Worker in order to eat breakfast and prepare for the day. *Interview with Social Worker*. During such sessions, Social Worker would review Student's schedule for the day and use social stories to explain any potentially unexpected events. *Id.*
26. On some days, Social Worker noted, either through observation or Student's verbal indication, that Student was experiencing fatigue and dysregulation. *Interview with Social Worker; Exhibit J*, pp. 145, 147. On such occasions, Social Worker would bring Student to the nurse's clinic and allow him to take a nap prior to joining class. *Interview with Social Worker*.
27. On other days, when Student had not rested in the nurse's office in the morning, Student would fall asleep in class and be taken to the nurse's office to rest by Teacher or another member of staff. *Interview with Teacher; Exhibit J*, pp. 146-147.
28. Parent, Teacher, and Social Worker all stated that they noticed a significant uptick in Student's time spent in the nurse's office beginning in March 2025. *Interviews with Parent, Teacher, and Social Worker*. Around this time, Social Worker noted that Student began to demonstrate severe fatigue during her morning check-in with far more frequency. *Interview with Social Worker*.
29. School kept records of Student's visits to the nurse's office, noting the reason for the visit and the amount of time spent in the office. *Exhibit J*, pp. 146-47; *CDE Exhibit 2*. From March 1, 2025, through the introduction of the Revised IEP on May 15, 2025—a period which included 47 instructional days—Student visited the nurse's office for reasons that included "fatigue" or "tired" on 22 days. *Id.*
30. In total, Student rested in the Nurse's office 1,705 minutes from March 1, 2025 through May 15, 2025. *Id.* This represents approximately 8.3% of the 20,445 minutes that he was at school during this time. *CDE Exhibit 1*.

F. Student's Performance and Behavior at School

31. During the third trimester, Student received three As, one B, one C, and two Fs, which, converted to a four-point scale, averages to a 2.43 grade point average. *Exhibit E*, p. 5. By

comparison, Student received a 2.43 and a 2.71 grade point average during the first two trimesters, respectively. *Id.*

32. Student's progress reports on his three annual goals note that he has made insufficient progress on each of the goals. *Exhibit A*, pp. 8-12. Specifically, in describing Student's performance on his mathematics goals, the Revised IEP states that Student "often attends math class dysregulated, or very tired, complaining of a headache or stomachache. When in small group, [Student] will often lay his head down and is slow to comply with directions given." *Id.*
33. School staff and Parent report that Student has been involved in several behavioral incidents during the 2024-2025 school year. *Interviews with Social Worker, Teacher, and Parent*. These incidents involved Student physically harming peers and school staff, and on one occasion resulted in the evacuation of the playground for safety reasons. *Exhibit M*.
34. Members of School and District staff reported that these behavioral incidents were more frequent and more severe when Student came to class fatigued. *Interviews with Social Worker and Teacher*. In a May 1, 2025, email to Parent, Assistant Director stated:

"If he does not get a chance to sleep, resulting in lack of preparedness to complete and maintain a readiness to learn, and then we put him in a situation of significant cognitive demand, we see an significant increase in behaviors. [...] When we offer [Student] a chance to sleep or take a quick nap in these cases, we have consistently seen safety-related concerns decrease."

Exhibit J, p. 147.

35. Based upon concerns related to Student's performance and behavior during the spring, District convened a properly constituted IEP team meeting on March 26, 2025, to consider an amendment to the IEP which would provide additional mental health support for Student inside the general education classroom. *Exhibit B*, p. 3. At the meeting, the IEP team determined that Student's IEP would be amended to add 130 minutes per month of direct mental health services. *Exhibit A*, at pp. 41-42.
36. Student's performance and behavioral concerns persisted despite the March 2025 IEP amendment. *Interviews with Social Worker, Teacher, and Assistant Director*. As a result, District convened another properly constituted IEP team meeting on April 30, 2025, to develop a new IEP for Student. *Exhibit B*, pp. 1-2. At this meeting and its follow-up on May 15, 2025, the IEP team determined that Student should be placed in an affective needs program, and created a service delivery plan that indicated that he would be in the general education setting 65.5% of the time. *Exhibit A*, pp. 23-24.

CONCLUSIONS OF LAW

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

Conclusion to Allegation No. 1: District did not fully implement the LRE provision of Student's IEP from March 1, 2025 through May 15, 2025, as required by 34 C.F.R. § 300.323. However, this noncompliance was not material and did not result in a denial of FAPE.

Parent's concern is that Student did not receive the amount of time in the general education environment established in the IEP. (FF #s 25-32.)

A. IEP Implementation: IDEA Legal Requirements

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 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 district must ensure that each teacher and related services provider has access to the IEP and 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. February 2024 IEP Accessibility and Responsibilities

The CDE must determine whether the District satisfied its obligation under 34 C.F.R. § 300.323(d).

Here, Teacher and Social Worker ensured that staff responsible for implementing Student's IEP had access to, and knowledge about, Student's IEP. (FF #s 9-11.) Before the school year, and after each change to Student's IEP, Teacher and Social Worker met with all of Student's teachers to discuss Student's IEP and BIP and answer any questions related to implementation. (FF # 9, 11.) Social Worker ensured that Student's teachers had access to the IEP via email, over a shared Google Drive folder, and in hard copy where requested. (FF # 10.)

Based upon these facts, the CDE finds and concludes that District complied with 34 C.F.R. § 300.323(d).

C. IEP Implementation: Least Restrictive Environment

The CDE must now determine whether District satisfied its obligation under 34 C.F.R. §§ 300.320(a)(5) and 300.323(c). An IEP must describe a student's LRE, which is the maximum appropriate participation, for that student, in the regular educational environment. 34 C.F.R. §§

300.114(a), 300.117. The IEP must explain “the extent, if any, to which the child will not participate with nondisabled children in the regular class.” *Id.* § 300.320(a)(5). Students with disabilities must be educated in the LRE specified by their IEP. *Id.* §§ 300.320(a)(5), 300.323(c)(2).

Student’s IEP, from March 1, 2025 through May 15, 2025, required that Student be in the general education environment 99.4% of the time. (FF # 18.) During this period, Student was frequently outside of the general education classroom so that he could sleep in the nurse’s office when noticeably fatigued. (FF # 26-30.) From March 1, 2025 to May 15, 2025, Student was outside of the general education environment for 1,705 minutes, an amount that represents 8.3% of Student’s school minutes during this period. (FF #s 29-30.) Put another way, Student was inside the general education environment during this period 91.7% of the time, less than the 99.4% established in the IEP.

Based upon these facts, the CDE finds and concludes that District did not fully implement the LRE component of Student’s IEP from March 1, 2025 through May 15, 2025, as required by 34 C.F.R. § 300.323(c)(2).

D. Materiality of Nonadherence to the IEP

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. However, not every deviation from an IEP’s requirements results in a denial of a FAPE. *See, e.g., L.C. and K.C. v. Utah State Bd. of Educ.*, 125 Fed. Appx. 252, 260 (10th Cir. 2005) (holding that minor deviations from the IEP’s requirements which did not impact the student’s ability to benefit from the special education program did not amount to a “clear failure” of the IEP); *T.M. v. District of Columbia*, 64 IDELR 197 (D.D.C. 2014) (finding “short gaps” in a child’s services did not amount to a material failure to provide related services). Thus, a “finding that a school district has failed to implement a requirement of a child’s IEP does not end the inquiry.” *In re: Student with a Disability*, 118 LRP 28092 (SEA CO 5/4/18). Instead, “the SCO must also determine whether the failure was material.” *Id.* Courts will consider a case’s individual circumstances to determine if it will “constitute a material failure of implementing the IEP.” *A.P. v. Woodstock Bd. of Educ.*, 370 Fed. Appx. 202, 205 (2d Cir. 2010).

“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 ex rel. Van Duyn v. Baker Sch. Dist. 5J*, 502 F.3d 811, 822 (9th Cir. 2007). The materiality standard “does not require that the child suffer demonstrable educational harm in order to prevail. However, the child’s educational progress, or lack of it, may be probative of whether there has been more than a minor shortfall in the services provided.” *Id.*

Here, the IEP required that Student be in the general education environment 99.4% of the time, but due to School allowing him to sleep in the nurse’s office, he was only in the general education environment 91.7% of the time. (FF # 30.)

As an initial matter, this is a relatively minor discrepancy—a difference of less than 8%. Moreover, this time period represented a short timeframe, spanning just two and a half months of the school year.

The reasons for this discrepancy, however, are also important to consider. Allowing Student to rest when fatigued and dysregulated is a component of Student’s BIP, designed to avoid and mitigate challenging behaviors like those Student had been exhibiting on days when he came to school improperly rested. (FF #s 22, 33-34.) Moreover, teachers noted that Student’s evident fatigue was a factor inhibiting his ability to make progress toward annual IEP goals. (FF # 32.) When Student was provided the opportunity to rest, he exhibited fewer challenging behaviors and was more successful in school. (FF # 34.)

In sum, while addressing Student’s rest needs by allowing him to sleep for a short period when fatigued did result in Student spending fewer minutes in the general education environment, Student was more able to access a FAPE when he had done so. Moreover, a strict compliance with the percentage-based LRE calculation would have denied Student the behavioral strategies and accommodations outlined in his BIP. Student’s substantial needs, as evidenced from March 1, 2025, through May 15, 2025, created an inherent tension between implementing Student’s BIP and implementing his LRE⁴. District chose the option that promoted Student’s ability to receive a FAPE. *See Doug C. v. Hawaii Department of Education*, 720 F.3d 1038, 1046 (9th Cir. 2013) (holding that when confronted with complying with one IDEA procedural requirement or another, school districts must make a reasonable determination of which course of action promotes the central purpose of the IDEA which is “to provide disabled students a free appropriate public education and to protect the educational rights of those students”).

For these reasons, the CDE finds and concludes that District’s nonadherence to the LRE component of Student’s IEP was not material and did not result in a denial of FAPE.

Systemic IDEA Noncompliance: This investigation does not demonstrate noncompliance that is systemic in nature nor that it will likely impact the future provision of services for all children with disabilities in District if not corrected.

Pursuant to its general supervisory authority, the CDE must consider and ensure the appropriate future provision of services for all IDEA-eligible students in 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 SEA’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).

⁴ That the IEP’s provisions were in tension is an indication that the IEP was no longer meeting Student’s needs, and needed to be reviewed and revised. District acted appropriately to first amend the IEP, and then develop a new IEP to better address Student’s emerging needs.

Here, nothing in the Record indicates that District’s noncompliance is systemic in nature. District provides consistent training to staff members regarding their IEP development responsibilities, and special education administrators make themselves available to building-level staff to ensure compliance with IDEA and ECEA Rules. (FF #s 5-6.) Director described policies, practices and procedures consistent with the legal requirements outlined in this Decision. (FF #s 17-18.) Finally, the noncompliance described in this Decision was specific to Student, and in response to Student’s specific increased needs. (FF #s 23-34.)

Accordingly, the CDE finds and concludes that this noncompliance is not likely to impact the future provision of services for all children with disabilities in District.

REMEDIES

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

1. District did not implement the LRE component of Student’s IEP, as required by 34 C.F.R. § 300.323.

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

1. Corrective Action Plan

- a. By **Monday, September 8, 2025**, 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 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 District’s timely correction of the areas of noncompliance.

2. Final Decision Review

- a. Assistant Director must read this Decision in its entirety, as well as review the requirements of 34 C.F.R. § 300.323, by **Monday, September 8, 2025**. If this individual is no longer employed by the District, the District may substitute an individual occupying an identical role to demonstrate compliance with this remedy. A signed assurance that this information has been read and reviewed must be provided to the CDE no later than **Monday, September 15, 2025**.

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

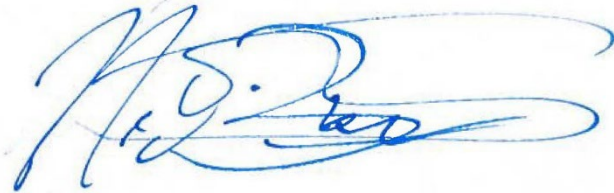
201 E. Colfax Avenue
Denver, CO 80203

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

CONCLUSION

The Decision of the CDE is final and is not subject to appeal. *CDE's State Complaint Procedures*, Section E, ¶ 2. 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. *Id.*; *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 State Complaints Officer ("SCO").

Dated this 7th day of August, 2025.



Nick Butler
State Complaints Officer

APPENDIX

Complaint, pages 1-4

- Exhibit 1: April 2025 IEP
- Exhibit 2: April 2025 BIP
- Exhibit 3: Emails between Parent and ELA Teacher
- Exhibit 4: IEP Meeting Notes May 2024
- Exhibit 5: School-based Support Plan
- Exhibit 6: School Safety Plan
- Exhibit 7: IEP Amendment March 2025
- Exhibit 8: PWN April 2025
- Exhibit 9: IEP October 2024
- Exhibit 10: Competency Evaluation of Student
- Exhibit 11: Neuropsych Evaluation June 2025
- Exhibit 12: Proposed Settlement Offer
- Exhibit 13: Municipal Court Documents

Response, pages 1-7

- Exhibit A: IEPs
- Exhibit B: Notices of Meetings
- Exhibit C: n/a
- Exhibit D: n/a
- Exhibit E: Schedule, grades, attendance
- Exhibit F: Progress monitoring
- Exhibit G: n/a
- Exhibit H: District Calendar
- Exhibit I: Policies and Procedures
- Exhibit J: Correspondence
- Exhibit K: n/a
- Exhibit L: Confirmation of Delivery
- Exhibit M: Behavior Detail Report

CDE Exhibits

- CDE Exhibit 1: School Calendar and Bell Schedule
- CDE Exhibit 2: Chart of Student Time in Clinic – May 2025

Telephone Interviews

- Parent: July 14, 2025
- Social Worker: July 15, 2025

- Assistant Director: July 15, 2025
- Teacher: July 16, 2025