

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

State Complaint SC2025-627
Poudre School District

DECISION

INTRODUCTION

On November 5, 2025, the parents (“Parents”) 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 Poudre School District (“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 November 5, 2024. Information prior to November 5, 2024 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 implement Student’s Individualized Education Plan (“IEP”) from August 27, 2025 to present 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);
- b. Did not provide the accommodations listed in the IEP to support him in the cafeteria environment—specifically (I) access to noise-cancelling headphones, (II) extra time for eating, (III) a separate eating space, and (IV) reminders to get eating needs met and extra time for doing so—as required by 34 C.F.R. § 300.323(c);
- c. Did not provide the accommodations listed in the IEP to support his transitions and social interactions—specifically (I) reminders to get restroom needs met and extra time for doing so, (II) allowing “multiple ways to communicate with adults and peers, allow non-verbal communication,” and (III) “direct instruction and adult facilitation to positively interact with peers and adults so he is able to seek help when needed”—as required by 34 C.F.R. § 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 6 years old and attended kindergarten at a District school (“School”) from August 14, 2025 to November 7, 2025. *Response*, p. 1; *Exhibit A*, p. 1. He qualifies for special education and related services under the disability categories of Autism Spectrum Disorder (“ASD”) and Speech or Language Impairment. *Exhibit A*, p. 1.
2. Student is sweet, bright, and engaged. *Interviews with Speech Language Pathologist (“SLP”) and Kindergarten General Education Teacher (“Kindergarten Teacher”)*. He likes to understand how things work, and he is very funny when he feels comfortable. *Interview with Parents*. Student struggles to express his wants and needs, and he has sensory sensitivities that can cause dysregulation. *Id.* When Student feels dysregulated, he tends to withdraw, engage in task-avoiding behavior, and become anxious and stressed. *Id.*
3. This investigation involves the implementation of accommodations from an IEP dated November 21, 2024 (“IEP”), which was developed by Student’s preschool IEP team and was in effect when Student attended School. *See Exhibit A*, pp. 1-18.

B. District Policies, Procedures, and Practices

4. District maintains an Integrated Services Manual (“Manual”) that includes guidance on the development and implementation of IEP accommodations. *Exhibit H*, pp. 1-30, 230-231, 265-

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

267; *Interview with District Assistant Director of Integrated Services (“Assistant Director”)*. District staff can access the Manual through District’s online staff document library. *Interview with Assistant Director*.

5. District’s guidance on IEPs defines accommodations as supports that “allow a student to access the curriculum, but do not change the standards or expectations in any way.” *Exhibit H*, p. 230. For instance, accommodations can involve adapting “instructional strategies (materials, manner of presentation, grouping, format)” or the “classroom environment (seating arrangements, lighting, sound, etc.)” *Id.* IEP teams should consider student preferences for accommodations, as student “input can increase the likelihood that an accommodation will be used effectively” and students “can provide feedback on which accommodations . . . are helpful and which are not.” *Id.* at p. 231.
6. District trains new staff on special education policies, procedures, and practices at a two-day training before each new school year, or on an as-needed basis when an employee starts at a different time. *Interview with Assistant Director*. District also provides special education trainings through Enrich—its online special education management platform—for staff. *Id.*
7. District special education teachers and related service providers, such as SLPs, have direct access to IEPs through Enrich. *Interviews with Assistant Director, Student’s Integrated Services Case Manager (“Case Manager”), and SLP.*
8. At the beginning of the school year, a member of School’s special education team, such as a case manager, is expected to provide a physical copy of an IEP snapshot to teachers and other staff members responsible for IEP implementation. *Interviews with Assistant Director, Case Manager, and SLP.* IEP snapshots are automatically populated from Enrich, and they include information on eligibility, special factors, accommodations and modifications, special education services, and IEP goals. *See Exhibit L*, pp. 32-37; *Interviews with Assistant Director, Case Manager, and SLP.* School staff, including general education teachers, can also access IEP snapshots on Enrich. *Interviews with Assistant Director and Case Manager.*

C. Student’s IEP

9. Student’s IEP documents his present levels of educational performance, providing input from his teachers, documenting his progress on IEP goals, describing the impact of his disability on his academics and speech, and recording parental input. *Exhibit A*, pp. 1-5.
10. Student’s Needs and Impact of Disability section notes that Student requires “direct instruction and adult facilitation to positively interact with peers and adults so he is able to seek help when needed, share wants and needs, initiate and/or join with peers and maintain friendships and become part of the classroom community.” *Id.* at p. 5. This section also states that Student’s disability may “impact his ability” to “communicate in the general education

classroom.” *Id.* Student also needs “supports in the area of sensory regulation abilities so he can more effectively remain engaged and regulated throughout daily activities.” *Id.*

11. The IEP identifies three annual goals for Student: one social and emotional wellness goal and two communication goals. *Id.* at pp. 6-8.

12. The IEP identifies 30 accommodations grouped into four categories: accommodations to support sensory needs, to support in the cafeteria environment, to support social interactions, and to support with transitions and in the classroom. *Id.* at pp. 8-9. Of these accommodations, six are relevant to this investigation:

- To support in the cafeteria environment:
 - “Access to noise[-]cancelling headphones;”
 - “[E]xtra time for eating if needed;”
 - “If needed, access to a separate eating space;” and
 - “Reminders to get needs met and extra time for doing so (usage of restroom; eating).”
- To support social interactions and “transitions and classroom support:”
 - “Allow [Student] multiple ways to communicate with adults and peers, allow non[-]verbal communication;” and
 - “Reminders to get needs met and extra time for doing so (usage of restroom; eating, drinking water[,]) use chewie instead of chewing on clothes, hair or non[-]edible items.”

Id. at pp. 8-9; *Complaint*, pp. 4-5.

13. The IEP included accommodations for the cafeteria environment because of Student’s sensory concerns and restrictive diet. *Interview with Parents*; see *Exhibit 3*, p. 1; *Exhibit A*, pp. 3-5. He tends to become dysregulated and have trouble eating if exposed to non-preferred foods and smells in his eating environment. *Id.*

14. The IEP requires specialized instruction in social skills and related services for sensory regulation/integration services and functional communication. *Exhibit A*, p. 11.

15. Finally, the IEP determined that it was appropriate for Student to participate in the general education classroom at least 80% of the time in Kindergarten. *Id.* at p. 13.

D. Accessibility of Student's IEP to Teachers and Others

16. During teacher workdays before the 2025-2026 school year, Case Manager provided a hard copy of Student's IEP snapshot to Kindergarten Teacher and all staff members who worked with Student, including paraprofessionals and specials teachers. *Interviews with Case Manager and Kindergarten Teacher.*
17. Student's IEP snapshot listed all accommodations, including the specific accommodations he required in the cafeteria environment, to support social interactions, and to support transitions and in the classroom. *Exhibit L, pp. 32-33.*
18. Case Manager discussed the IEP snapshot with Kindergarten Teacher and highlighted Student's accommodations. *Interviews with Case Manager and Kindergarten Teacher.* Kindergarten Teacher also accessed and familiarized herself with Student's IEP snapshot through Enrich. *Interview with Kindergarten Teacher.*
19. Additionally, Case Manager and Kindergarten Teacher had dedicated collaboration time each Tuesday morning to touch base on student needs, including implementation of accommodations for Student. *Interview with Case Manager.*
20. Case Manager discussed Student's cafeteria-specific IEP accommodations with Paraprofessional 1 and Paraprofessional 2, who monitored Student during lunch. *Interviews with Case Manager, Paraprofessional 1, and Paraprofessional 2.* Both Paraprofessional 1 and Paraprofessional 2 were familiar with Student's accommodations to support in the cafeteria environment and understood their responsibilities for implementation. *Interviews with Paraprofessional 1 and Paraprofessional 2; see Exhibit A, pp. 8-9; Exhibit L, pp. 32-33.*
21. SLP accessed and familiarized himself with Student's IEP on Enrich before the 2025-2026 school year began. *Interview with SLP.*

E. Provision of Accommodations: Cafeteria Environment

22. Parents' concern is that District did not provide four accommodations required by Student's IEP for support in the cafeteria environment: (I) access to noise-cancelling headphones, (II) extra time for eating, (III) a separate eating space, and (IV) reminders to get eating needs met and extra time for doing so. *Complaint, p. 4.*

Noise-Cancelling Headphones

23. Student's IEP contains an accommodation for support in the cafeteria environment which reads: "[a]ccess to noise[-]cancelling headphones." *Exhibit A, p. 8.*
24. Parents interpreted this accommodation as requiring that Student be able to easily grab his headphones when he needed them, and suggested that, for the cafeteria environment,

Student should have either had his headphones with him or should have been given access to a set of cafeteria-specific headphones. *Id.*

25. Case Manager understood this accommodation as requiring that Student had headphones available that he could choose to use in environments where he might need them, such as the cafeteria. *Interview with Case Manager.* Similarly, Paraprofessional 1 and Paraprofessional 2 interpreted this accommodation as Student having the choice to use available headphones. *Interviews with Paraprofessional 1 and Paraprofessional 2.*
26. Kindergarten Teacher interpreted this accommodation as requiring her to offer headphones to Student during atypical events, such as fire drills and assemblies in the cafeteria, but otherwise “not stopping him from getting [headphones]” and “always allowing” him to use headphones whether it was noisy or not. *Interview with Kindergarten Teacher.*
27. Based on the plain language of the accommodation, the CDE finds that the accommodation required School to make headphones available for use in the cafeteria that Student could locate and access at any time. *See Exhibit A, p. 9.*
28. Student brought a pair of noise-cancelling headphones with him from home every day, which he kept in his backpack. *Interviews with Parents, Case Manager, and Kindergarten Teacher.* School also made noise-cancelling headphones available in Student’s classroom. *Interviews with Case Manager and Kindergarten Teacher; Response, p. 6.* School did not provide cafeteria-specific headphones. *Interviews with Paraprofessional 1 and Paraprofessional 2.*
29. As part of her overview of classroom systems at the beginning of the year, Kindergarten Teacher introduced the classroom headphones to students, including Student. *Interview with Kindergarten Teacher.* She instructed Student and other students with similar accommodations that they could “grab headphones whenever they were ready [to go to lunch] or needed them.” *Id.*
30. Student used his personal headphones during lunch, which he took with him to the cafeteria from his backpack, for about a week at the beginning of the school year. *Interviews with Kindergarten Teacher, Case Manager, and Paraprofessional 2; Response, p. 6.*
31. After the first week, he rarely carried headphones with him to the cafeteria. *Interview with Paraprofessional 2.* Per Case Manager, Student “was not a kid who needed his headphones all the time.” *Interview with Case Manager.* Kindergarten Teacher noted that Student “never expressed any type of need for noise-cancelling headphones” but “would have been allowed” headphones if he wanted them. *Interview with Kindergarten Teacher.*
32. Parents and Kindergarten Teacher met during Parent-Teacher Conferences on October 16, 2025 and discussed implementation of this accommodation. *Interviews with Parents, Kindergarten Teacher, and Case Manager; Exhibit L, p. 31.*

33. Parents offered a suggestion, which they originally raised on October 6, 2025, that Student could benefit from a “seat pocket:” a portable, small pouch attached to the back of Student’s chair that can hold items like headphones. *Interview with Parents; see Exhibit L, p. 1; Exhibit 3, p. 7.* The purpose of this seat pocket was to make items, like headphones, readily accessible to Student, who—because of his disability—struggled to ask for his headphones and believed he was not allowed to access them. *Interviews with Parents; see Exhibit I, pp. 192, 199-200, 402, 511.*
34. That same day, School agreed to use a seat pocket for Student and Case Manager procured one that Student started using on October 20, 2025. *Exhibit L, p. 31; Exhibit I, pp. 192, 199-200, 402, 511; Exhibit 3, p. 8; Interviews with Parents, Case Manager, and Kindergarten Teacher.* At this point, Student’s personal headphones were available in his seat pocket when he ate lunch in the cafeteria and he began to use them more frequently. *See Exhibit L, p. 31; Exhibit 3, p. 8; Interviews with Case Manager and Kindergarten Teacher.*
35. Student’s use of headphones in the cafeteria during the first week of School supports that he was aware that he could access headphones for use in the cafeteria. *See Interviews with Case Manager, Paraprofessional 1, and Paraprofessional 2.* While the addition of a seat pocket provided more effective access to headphones, the accommodation did not require use of this specific device and School nonetheless provided access to headphones before implementing the seat pocket. *See Exhibit A, p. 9; Exhibit L, p. 31; Interviews with Case Manager, Kindergarten Teacher, Paraprofessional 1, and Paraprofessional 2.*
36. For these reasons, including the corroboration among witnesses, the CDE finds that District provided access to noise-cancelling headphones consistent with the IEP between August 27, 2025 and November 7, 2025. *Exhibit A, p. 9; Response, p. 6; Exhibit L, p. 31.*

Extra Time for Eating

37. Student’s IEP also contains an accommodation for support in the cafeteria environment which reads: “extra time for eating if needed.” *Exhibit A, p. 8.*
38. Parents contend that this accommodation was not implemented because Student frequently came home with uneaten or barely eaten lunches and told Parents that he did not have enough time to eat. *Interview with Parents; Reply, pp. 13-14; see Exhibit 13, p. 1.*
39. Parents understood this accommodation to require that Student have extra time to eat built into his cafeteria schedule, such as leaving to eat before his class or continuing to eat after his class transitioned to recess. *Interview with Parents; see Exhibit I, p. 402.*
40. Parents emphasized that the accommodation should not require Student to verbalize when he “needed” extra time to eat, given his communication and eating struggles. *Interview with Parents; see Exhibit A, pp. 1-9.* Instead, Parents understood extra time for eating to be “needed” as a baseline because they had notified School about Student’s eating struggles as

of the second day of School (August 15, 2025) and later told School that he needed extra time to eat. *Interview with Parents; Reply*, pp. 13-14; *Exhibit 3*, p. 1; *Exhibit I*, pp. 45, 402.

41. School understood this accommodation as requiring additional time for Student to eat if he needed it, where “need” would be established by Student communicating to School staff that he needed more time, taking the opportunity to leave early for the cafeteria, or through professional judgment based on observations of Student. *Response*, pp. 10-11; *Interviews with Case Manager, Paraprofessional 1, and Paraprofessional 2; Exhibit M*, 0:24:00 – 0:29:00; 0:42:00 – 0:44:00.
42. From School’s perspective, Student did not usually “need” extra time for eating and often finished his lunches well before other students. *Interviews with Case Manager, Paraprofessional 1, and Paraprofessional*.
43. Based on the plain language of the accommodation, the CDE finds that Student’s IEP accommodations required School to provide Student additional time for eating as needed, where Student “needed” extra time when he was not eating at lunch. *See Exhibit A*, pp. 8-9.
44. On August 27, 2025, Parent raised concerns with Case Manager that Student “hasn’t been eating his lunch at [S]chool . . . We are wondering what can be done to accommodate his needs so he can eat during lunch.” *Exhibit 3*, p. 1.
45. Paraprofessional 1 and Paraprofessional 2 also observed that Student was not eating or barely eating his food around this time. *Interviews with Paraprofessional 1 and Paraprofessional 2*. They communicated these concerns to Case Manager. *Id.*
46. Because Parents reported and Paraprofessional 1 and Paraprofessional 2 observed that Student was not eating his lunch at School, the CDE finds that Student needed extra time to eat between August 27 and November 7, 2025. *See Exhibit 3*, pp. 1-3; *Exhibit I*, p. 52; *Interviews with Parents, Paraprofessional 1, and Paraprofessional 2*.
47. On August 28, 2025, School implemented an individualized cafeteria routine in response to Parents’ concerns and observations from Paraprofessional 1 and Paraprofessional 2. *Interviews with Case Manager, Paraprofessional 1, and Paraprofessional 2; Exhibit M*, 0:32:00 – 0:34:00; *see Exhibit 3*, pp. 1-2. This routine provided seven to eight extra minutes to eat compared to classmates and offered him the choice to leave early for the cafeteria. *Interviews with Case Manager, Paraprofessional 1, and Paraprofessional 2; Exhibit M*, 0:32:00 – 0:34:00; *see Exhibit 3*, pp. 1-2.
48. Student did not take the offers to leave for the cafeteria early. *Interviews with Case Manager, Paraprofessional 1, Paraprofessional 2, and Kindergarten Teacher; Exhibit M*, 0:10:30 – 0:11:30; 0:16:00 – 0:21:00.

49. Per Student’s individualized cafeteria procedure, Student was “the first student to grab his food and choose his seat.” *Exhibit A*, p. 8; *Interviews with Case Manager, Paraprofessional 1, and Paraprofessional 2*; see *Exhibit M*, 0:10:00 – 11:30; 0:16:00 – 0:18:00; *Exhibit 3*, pp. 1-2.
50. Paraprofessional 1, who walked Student and his class to the cafeteria, ensured he was the first to sit down. *Interview with Paraprofessional 1*. Because Student was the first to sit and brought lunch from home, this routine built in extra time for Student to eat while other students still waited in line for their food. *Interviews with Paraprofessional 1, Paraprofessional 2, and Case Manager*.
51. On October 22, 2025, Parents emailed Case Manager to notify her that “[t]here are times [Student] can’t finish his lunch because he’s worried about missing recess . . .” *Exhibit I*, p. 402. Student did not finish his lunch on at least October 28, 2025 and October 31, 2025. See *Exhibit 13*, p. 1. In response, School suggested that staff could take Student to the cafeteria early, before anyone else, as an additional way to provide extra time to eat. *Exhibit I*, p. 402.
52. While Student might not have finished his lunch on certain days because he wanted to attend recess, the accommodation does not require that Student finish his lunch every day. See *Exhibit A*, pp. 8-9. During this time, Student had extra time to eat as provided for by his individualized cafeteria schedule. See *Interviews with Case Manager, Paraprofessional 1, and Paraprofessional 2*. Moreover, as soon as Parents notified School that this built-in extra time might not be effective because Student did not want to miss recess, School was responsive in offering a different method for ensuring extra time to eat. See *Exhibit I*, p. 402.
53. For these reasons, the CDE finds that District did not implement this accommodation on August 27, 2025, but otherwise provided this accommodation consistent with Student’s IEP between August 28 and November 7, 2025.

Separate Eating Space

54. Student’s IEP contains an accommodation for support in the cafeteria environment which reads: “[i]f needed, access to a separate eating space.” *Exhibit A*, p. 8.
55. Parents took this accommodation to require that Student have a separate space for eating when he was struggling to eat. *Interview with Parents*. A separate space to eat could be a separate table, or, if that did not help or was not feasible, a separate eating space altogether, such as the library. *Id.*
56. Based on conversations with Case Manager at the beginning of the year, Parents thought that a separate eating space outside of the cafeteria was unavailable, though that would have been their preferred space. *Id.*; see *Reply*, p. 13.
57. Like with extra time for eating, Parents understood this accommodation to be “needed” as a baseline because Parents had communicated to School, by August 15, 2025, that Student had

eating difficulties and, by August 27, 2025, that Student was having trouble eating at School. *Interview with Parents; see Exhibit 3, pp. 1-3.*

58. School understood this accommodation as requiring Student to have a separate space to eat “if needed,” where “need” could be demonstrated by Student asking to eat in the classroom or by professional judgement, such as observing Student not eating. *Interview with Case Manager; Exhibit M, 0:24:00 – 0:29:00; 0:42:00 – 0:44:00.*
59. Per School, a separate space could be a different table within the cafeteria or a separate environment, but School did not want to default to a separate environment because that “seemed more restrictive than what he needed” and could interfere with Student’s least restrictive environment. *Interview with Case Manager.*
60. Student’s other accommodations to support in the cafeteria environment corroborate School’s perspective that a separate eating space outside of the cafeteria should not have been the default location to eat. *Exhibit A, pp. 8-9.* For instance, accommodations such as “preferential seating (option to sit [i]n the same spot; sitting closer to the end of the table)” and “[Student] will be the first student to grab his food and choose his seat” demonstrate the expectation that Student would eat lunch with his peers in the cafeteria. *Id.*
61. For these reasons, the CDE finds that this accommodation required School to provide a separate eating space, such as a separate table within the cafeteria or a separate space outside the cafeteria, when Student was not eating at lunch. *See Exhibit A, p. 9; Interview with Parents, Case Manager, Paraprofessional 1, and Paraprofessional 2; Exhibit 3, pp. 1-6; Exhibit I, pp. 190-191.*
62. On August 27, Parent notified Case Manager that Student still “had not been eating his lunch at school” and shared that he wanted to “sit alone at lunch because eating around other people feels overwhelming for him and causes him a lot of anxiety.” *Exhibit 3, p. 1.* Student expressed this need to either Paraprofessional 1 or Paraprofessional 2, but they misunderstood his request and thought he wanted to be left alone rather than separated. *Id.*
63. Given Parents’ reports that Student was not eating at School and needed a separate space, the CDE finds that Student needed this accommodation between August 27 and November 7, 2025. *See Exhibit 3, pp. 1-3; Exhibit I, p. 52; Interviews with Parents, Paraprofessional 1, and Paraprofessional 2.*
64. On August 28, Case Manager worked with Paraprofessional 1 and Paraprofessional 2 to set up a procedure where Student could eat at his own table. *Id.* at pp. 1-3. Parent indicated that Student was able to eat part of his lunch that day. *Id.*
65. However, on September 3, Parent again notified Case Manager that Student “hasn’t been eating his lunch at lunch time this week [because:] food that other kids are eating make him lose his appetite when it’s too close to his food[;] the bustle of the cafeteria is overwhelming

to him[;] the smells are overwhelming to him[;] and ‘all of the overwhelm made [him] feel scared.’” *Id.* at p. 3. Parents said it helped “when he was able to eat away from the rest, but that only happened once. The rest of the time, at least one other student sits with him despite him isolating himself.” *Id.*

66. Case Manager responded to Parents that School staff “did not continue” the procedure for Student to sit at his own table that she had implemented on August 28, 2025. *Id.* at pp. 3-4.
67. While Student did not eat at lunch in the cafeteria that week, he was able to eat his food at snack time. *Id.*
68. On September 4, Case Manager provided Student with a “rainbow barrier” to create separation for Student in the cafeteria and discussed this procedure with Paraprofessional 1 and Paraprofessional 2. *Id.* at p. 4; *Interviews with Case Manager, Paraprofessional 1, and Paraprofessional 2.* This rainbow barrier was a partition that Student put on his table, surrounding himself on three sides, to create physical and visual separation within the cafeteria. *Interviews with Case Manager, Paraprofessional 1, and Paraprofessional 2.*
69. Starting September 4, Student always sat at a separate table with his rainbow barrier up, while his class and the other kindergarten class sat at two other tables. *Id.* Student’s table was next to Paraprofessional 2 and her classroom table. *Id.* The tables were long, allowing for about 12 students to sit on each side. *Id.* Student sat alone at the far end of his table. *Id.*
70. After using this rainbow barrier and sitting at his own table, both School and Parent noticed that Student “ate a lot more of his lunch” and “liked the divider.” *Exhibit 3*, p. 4. On September 17, Case Manager checked in with Parents that he “is doing well with eating his lunch—are you noticing the same? Let me know.” *Id.* at p. 6. Parent responded that Student had been “eating everyday and it seems like he is happy with the accommodations provided.” *Id.*
71. Both Paraprofessional 1 and Paraprofessional 2 echoed that Student had trouble eating before his rainbow barrier was in place, but that he was able to eat successfully once he had his barrier and sat at a separate table. *Interviews with Paraprofessional 1 and Paraprofessional 2.*
72. For these reasons, the CDE finds that School did not provide this accommodation to Student on August 27, 2025 and between August 29 and September 3, 2025 because Student was not eating his lunch but was not provided a separate space to eat. *See Exhibit 3*, pp. 1-4. However, District implemented this accommodation consistent with the IEP on August 28, 2025, when Student sat at a separate table and successfully ate his lunch, and from September 4 through November 7, 2025 when School provided Student with a rainbow barrier and ensured he sat at a separate table away from classmates. *Id.* at pp. 4-6.

Reminders for Eating Needs

73. Finally, Student's IEP contains an accommodation for support in the cafeteria environment which reads: "[r]eminders to get needs met . . . (. . . eating)." *Exhibit A*, p. 8.
74. Both Parents and School understood this accommodation to require Paraprofessional 1 and Paraprofessional 2 to give reminders to Student in the cafeteria to encourage him to eat his food. *Interviews with Parents, Case Manager, Paraprofessional 1, and Paraprofessional 2*.
75. Parents are concerned that School did not implement this accommodation because Student coming home with full lunch boxes and expressing that he did not have time to eat suggests that he did not get reminders to eat. *Interview with Parents; see Exhibit 13*, p. 1.
76. Paraprofessional 1 and Paraprofessional 2 provided direct, individualized reminders for Student to eat every day in the cafeteria. *Interviews with Paraprofessional 1 and Paraprofessional 2*.
77. Paraprofessional 1 gave primarily non-verbal reminders for Student to eat, including getting Student's attention and making eye contact with him, and then bringing her hands to her mouth to gesture the motion of eating. *Interview with Paraprofessional 1*. Student would nod in response, and then Paraprofessional 2 would follow up by physically walking to Student's partition to ensure he understood the reminder and was eating. *Interviews with Paraprofessional 1 and Paraprofessional 2*.
78. Paraprofessional 2 gave verbal and non-verbal reminders for Student to eat, including by walking over to Student to see if he was eating, and, if he was not eating, by verbally reminding him to take bites or by encouraging him through statements such as, "that looks yummy" and rubbing her stomach to mimic being hungry. *Interview with Paraprofessional 2*. Paraprofessional 2 also used a non-verbal "thumbs up" sign, where Student would indicate to her that he was finished eating by giving a thumbs up and lowering his partition. *Interviews with Paraprofessional 1 and Paraprofessional 2*.
79. While Paraprofessional 1 and Paraprofessional 2 gave frequent and direct reminders for Student to eat, they did not force Student to finish his food and would not tell Student that he needed to finish his food before being able to leave for recess. *Id.* As such, there were times when Student, though reminded to eat, would not finish his entire lunch. *Id.*
80. Providing reminders for Student to eat while not requiring Student to finish his lunch is consistent with Student's IEP, which does not include a formal eating program or IEP goal specifying that Student must eat a certain amount or type of food or must receive a specific number of prompts to eat. *See Exhibit A*, pp. 8-9; *Interview with Case Manager*.

81. For these reasons, including the corroboration among witnesses who monitored Student in the cafeteria, the CDE finds that District provided this accommodation to Student consistent with his IEP between August 27 and November 7, 2025.

F. Provision of Accommodations: Transitions/Classroom Support and Social Interactions

82. Parents' concern is that District did not provide three accommodations required by Student's IEP for support with transitions and in the classroom and with social interactions: (I) reminders to get restroom needs met and extra time for doing so, (II) allowing "multiple ways to communicate with adults and peers, allow non-verbal communication," and (III) "direct instruction and adult facilitation to positively interact with peers and adults so he is able to seek help when needed." *Complaint*, p. 5.

Reminders for Restroom Usage

83. Student's IEP contains an accommodation for transitions and classroom support which, in relevant part, reads: "[r]eminders to get needs met and extra time for doing so (usage of restroom . . .)." *Exhibit A*, p. 9.

84. Parents understood this accommodation to require that School staff directly remind and prompt Student to use the restroom, such as by approaching him individually and saying "it's time to use the bathroom" or "[Student name], go use the bathroom." *Interview with Parents*. Student has difficulty identifying when he needs to use the restroom. *Id.* As such, per Parents, general classroom reminders for all students would not be effective for Student since he could not identify his own toileting needs. *Id.*

85. School interpreted this accommodation to require providing Student the same reminders offered to other students regarding restroom usage and allowing Student to use the restroom at any time without needing to ask permission. *Interviews with Kindergarten Teacher and Case Manager*.

86. Based on the plain language of the accommodation, the CDE finds that this accommodation required School to give reminders to Student to use the restroom throughout the day. *See Exhibit A*, pp. 5, 8-9.

87. Parents contend that this accommodation was not provided between August 27 and November 7, 2025 because Student always needed to use the restroom urgently when they picked him up from School, and he had a urinary accident on October 22, 2025 during art class. *Interview with Parents; Reply*, p. 20; *Complaint*, p. 5.

88. District contends that such accidents are common for kindergarten students, and Student's single incident on October 22—rather than a pattern of accidents—supports that School was implementing this accommodation with fidelity. *Response*, pp. 12-13; *Interviews with Case Manager and Assistant Director*.

89. Kindergarten Teacher provided frequent reminders for all students, including Student, to use the restroom. *Interview with Kindergarten Teacher*. She provided reminders for bathroom breaks during in-class transitions, which occurred about every hour, and directed students to line up to use the restroom before and after transitions to specials classes, such as art class, and lunch. *Id.*
90. Kindergarten Teacher also enacted permissive bathroom policies that allowed students to use the restroom at any time. *Id.* For instance, students used an established hand signal to indicate needing to use the restroom during floor time and were allowed to use the restroom at any point without asking during table time. *Id.*
91. Student used the restroom regularly at School, including by lining up to use the restroom when reminded by Kindergarten Teacher before transitions. *Interview with Kindergarten Teacher and Case Manager*.
92. Student was also seated as close as possible to the restroom inside his classroom. *Interview with Case Manager*.
93. In art class, students were instructed and encouraged to use the restroom without first asking for permission or using a hand signal. *Response*, p. 12-13; *Interview with Case Manager*. Per classroom procedures, Kindergarten Teacher also reminded students to use the restroom before and after art class by telling them to line up if they needed to use the restroom. *Interview with Kindergarten Teacher*.
94. For these reasons, the CDE finds that District implemented this accommodation in accordance with the IEP between August 27 and November 7, 2025. *See Exhibit A*, p. 9.

Multiple, Non-Verbal Ways to Communicate

95. Student's IEP also contains an accommodation to support social interactions which reads: "[a]llow Student multiple ways to communicate with adults and peers, allow non[-]verbal communication." *Id.*
96. Parents understood this accommodation, given the inclusion of other accommodations directed toward non-verbal communication, as requiring School to proactively use specific non-verbal communication strategies, such as personalized table-top visuals, so that Student could always express his needs and ask for help—and to be understood by School staff when doing so. *Interview with Parents; see Exhibit A*, pp. 5-8; *Exhibit I*, p. 402; *Exhibit 4*, pp. 2-6.
97. School interpreted this accommodation as not forcing Student to adhere strictly to verbal communication but instead allowing him to use different modes of communication, such as gestures, speaking through his stuffed animal, using classroom and pocket-sized visual zones charts to communicate emotions and needs, and pointing. *Interviews with SLP, Kindergarten Teacher, and Case Manager*. Per this accommodation, School would not restrict Student's

chosen methods of communication and would “equally respect” his verbal and non-verbal communication attempts. *Interview with Case Manager*.

98. Looking at Student’s IEP as a whole, including other accommodations to support social interactions, favors School’s interpretation of the at-issue accommodation. *See Exhibit A*, pp. 8-9. For instance, other accommodations, per their plain language, do require the use of specific non-verbal communication strategies: “access to emotional visuals to express how he’s feeling,” “access to visuals for social interaction (social cards),” and “[a]llow [Student] to express emotions different ways (verbal, pointing to a visual, etc.) without requiring him to ‘show’ emotions physically.” *Exhibit A*, p. 9. The at-issue accommodation, on the other hand, does not include any particular non-verbal strategy. *Id.* In other words, if the at-issue accommodation required the proactive use of any specific non-verbal strategy, it would have said so (as the IEP did with other accommodations). *See id.*
99. Based on the plain language of the accommodation, considered in the context of other accommodations and the IEP as a whole, the CDE finds that it did not require the use of any specific non-verbal strategies and did not preclude verbal communication. *Id.* at pp. 5-9. Instead, this accommodation required School to take a proactive approach, such as using non-verbal communication strategies with Student, to “allow” for multiple forms of communication. *See Exhibit A*, pp. 5, 8-9; *Reply*, pp. 19-21; *Exhibit 4*, pp. 4-6.
100. Parents contend that this accommodation was not provided between August and November 2025 for two primary reasons: (1) Student was unable to ask for help after a series of incidents, including the urination accident on October 22 and a playground incident on October 21, where Student received bruises from another student and did not report the incident to School staff, and (2) during an October 27 meeting to discuss Parents’ IEP implementation concerns, Kindergarten Teacher and Case Manager insinuated that they only used verbal communication methods with Student and had not implemented non-verbal strategies in conversing with Student about the playground incident. *Interview with Parents; Reply*, pp. 10, 19-21; *Exhibit 4*, pp. 2-6; *Complaint*, p. 5.
101. Student communicated with School staff both verbally and non-verbally. *Interviews with Kindergarten Teacher, SLP, Case Manager, Paraprofessional 1, and Paraprofessional 2*.
102. Kindergarten Teacher used classroom visual aids, an interactive language rubric, and visual vocabulary cards with Student to allow for non-verbal communication in the classroom. *Interviews with Kindergarten Teacher and Case Manager; see Exhibit L*, p. 15. Classroom visuals, posted around the classroom, included images of classroom procedures that Student could point to or otherwise reference. *Interview with Kindergarten Teacher*.
103. Kindergarten Teacher also communicated with Student through his stuffed animal when he was warming up or showing signs of dysregulation and withdrawal. *Id.* Student would frequently speak through his stuffed animal, such as by adopting the voice and mannerisms of the animal. *Interviews with Kindergarten Teacher, Case Manager, and SLP*. Kindergarten

Teacher also relied on Student pointing or using hand signals to communicate needs or express choices. *Id.*

104. In the classroom, Kindergarten Teacher and Student also had a system where Student could walk to the classroom “calming corner” to regulate and demonstrate a need for support through this non-verbal action. *Interview with Kindergarten Teacher and Case Manager.*
105. SLP used “zone charts” with Student to allow for non-verbal communication. *Interview with SLP.* These pocket-sized tools, attached to a key ring, included labels and images for zones of regulation, corresponding emotions, and examples. *Id.* Student could indicate which “zone” applied to him, such as being sad, by pointing to or otherwise referencing the visual. *Id.* SLP would also act out the emotions with Student to illustrate the zones. *Id.*
106. On October 21, 2025, following an incident on the playground where Student was bruised, Student did not communicate the incident to School staff. *Interviews with Parents, SLP, and Kindergarten Teacher.* Similarly, on October 22, 2025, after Student had a urinary accident during art class, he did not communicate this to School staff. *Interview with Parents, Kindergarten Teacher, and Case Manager.*
107. However, two hours after the incident on the playground, Student met with SLP and had a chance to use multiple methods of communication. *Interview with SLP; Response, p. 2; Exhibit 4, p. 3.* SLP, noticing that Student seemed withdrawn, used his zone charts key ring with Student to promote non-verbal communication. *Id.* Student identified, through pointing, that he was in the “blue” zone and felt sad. *Id.* Student and SLP then acted out the emotion. *Id.* Student verbally expressed to SLP that he was sad because he missed his dad but did not otherwise indicate that he had experienced an incident on the playground. *Id.*
108. For these reasons, the CDE finds District allowed for multiple and non-verbal ways of communicating consistent with Student’s IEP from August 27 to November 7, 2025.

Direct Instruction and Facilitation of Positive Interactions

109. Parents allege that District did not provide “direct instruction and adult facilitation to positively interact with peers and adults so he is able to seek help when needed, share wants and needs, initiate and/or join play with peers and maintain friendships to become part of the classroom community” as an accommodation. *See Complaint, p. 5; Exhibit A, p. 5.*
110. Student’s IEP does not contain an accommodation regarding direct instruction and facilitation of positive interactions and Parents do not raise specific concerns about implementation of direct instruction or positive interactions. *See Exhibit A, pp. 8-9.* Instead, Parents’ concerns relate to Student’s needs and the impact of his disability. *Id.* at p. 5.
111. Therefore, while this language is important to illustrate Student’s needs, the CDE finds that this is not an accommodation District was required to implement. *See id.* at pp. 5, 8-9.

CONCLUSIONS OF LAW

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

Conclusion to Allegation No. 1: District ensured that staff had access to and an understanding of the responsibilities for implementing Student’s IEP, as required by 34 C.F.R. § 300.323(d). District provided accommodations in conformity with Student’s IEP, and thus implemented the IEP as required by 34 C.F.R § 300.323(c). District complied with the law.

A. IEP Implementation: 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 2.21. 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.*, 580 U.S. at 392 (quoting *Honig v. Doe*, 484 U.S. 305, 311 (1988); *Bd. of Ed. v. Rowley*, 458 U.S. 176, 181 (1982)). As soon as possible after an IEP is developed, school districts must implement the IEP by ensuring that: (1) teachers and related service providers responsible for implementation have access to and an understanding of their obligations under the IEP, and (2) special education and related services, including accommodations, are made available to the child in accordance with the IEP. 34 C.F.R. §§ 300.324(d), 300.324(c)(2).

B. IEP Accessibility to Teachers and Others

A school district must ensure that each regular education teacher, special education teacher, related services provider, and any other service provider responsible for implementing an IEP 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.” 34 C.F.R. § 300.323(d).

Here, District satisfied its obligation under 34 C.F.R. § 300.323(d). Case Manager and SLP had direct access to Student’s IEP on Enrich, and they both familiarized themselves with the IEP on this platform. (FF #s 16, 21). Additionally, Case Manager provided an IEP snapshot, which listed Student’s accommodations, to Kindergarten Teacher and other service providers at the beginning of the year. (FF #s 16-17). Case Manager and Kindergarten Teacher regularly discussed implementation of Student’s IEP, and Kindergarten Teacher also accessed and familiarized herself with Student’s IEP snapshot on paper and through Enrich. (FF #s 18-19). Case Manager also informed Paraprofessional 1 and Paraprofessional 2 of Student’s cafeteria-based accommodations, and both individuals understood their responsibilities for implementing

Student's IEP in the cafeteria. (FF # 20). For these reasons, the CDE finds and concludes that District complied with 34 C.F.R. § 300.323(d).

C. Provision of Accommodations

In implementing an IEP, a school district must provide special education and related services “in conformity with” the IEP. 34 C.F.R. §§ 300.17, 300.324(c)(2); see *Van Duyn ex rel. Van Duyn v. Baker Sch. Dist. 5J*, 502 F.3d 811, 821 (9th Cir. 2007). Not providing special education and related services in conformity with an IEP can result in the denial of FAPE. 34 C.F.R. § 300.17; ECEA Rule 2.21(4). However, “there is no statutory requirement of perfect adherence to the IEP.” *Van Duyn*, 502 F.3d at 821. In other words, not every shortfall in services between those required by an IEP and those provided will result in a denial of FAPE. *Id.* To result in a denial of FAPE, there must be “more than a minor or technical gap between the [IEP] and reality; *de minimis* shortfalls [that do not themselves deprive a student of the education promise of the IDEA] are not enough.” *L.J. by N.N.J. v. Sch. Bd. of Broward Cnty.*, 927 F.3d 1203, 1211 (11th Cir. 2019); 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 [CDE] must also determine whether the failure was material.” *Id.*

Material failures to implement an IEP constitute a denial of FAPE and substantive noncompliance with the IDEA. *Van Duyn*, 502 F.3d 811 at 822. “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.” *Id.* Courts will consider a case's individual circumstances to determine if there is a “material failure of implementing the IEP.” *A.P. v. Woodstock Bd. of Educ.*, 370 Fed. Appx. 202, 205 (2d Cir. 2010). Material failures include shortfalls in implementing “substantial,” “significant,” or “necessary” IEP provisions. *Id.* at 818. The materiality standard has qualitative and quantitative components: the CDE should “determine *how much* [of a service] was withheld and *how important* the withheld services were in view of the IEP as a whole.” *L.J. v. N.J.J. v. Sch. Bd. of Broward Cnty.*, 927 F.3d 1203, 1214 (11th Cir. 2019). 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.” *Van Duyn*, 502 F.3d 811 at 822.

Therefore, to assess implementation concerns, the CDE engages in a two-pronged inquiry: (1) was there a shortfall in the provision of services required by the IEP, and (2), if so, did the shortfall amount to a material failure to implement the IEP and thus a denial of FAPE?

1. Prong 1: Was there a Shortfall in Accommodations?

The CDE must first determine whether there was a shortfall between the accommodations required by the IEP versus those made available to Student. 34 C.F.R § 300.323(c)(2).

Cafeteria Accommodations

Here, Parents are concerned that four accommodations required by Student’s IEP for support in the cafeteria environment were not implemented between August 27 and November 7, 2025: (I) access to noise-cancelling headphones; (II) extra time for eating; (III) a separate eating space; and (IV) reminders to get eating needs met. (FF # 22).

As detailed in the Findings of Fact, District provided Student access to noise-cancelling headphones and reminders to get eating needs met consistently between August 27 and November 7, 2025. (FF #s 23-36, 73-81). As such, there was no shortfall in the provision of these accommodations. (FF #s 36, 81). However, District did not provide Student extra time for eating when he needed it on August 27, 2025. (FF #s 37-53). District also did not provide access to a separate eating space when Student needed it on August 27, 2025, and between August 29 and September 3, 2025. (FF #s 54-72).

Accordingly, there were two shortfalls regarding provision of cafeteria accommodations: one shortfall on August 27, 2025 for extra time for eating, and one on August 27 and from August 29 to September 3, 2025 for a separate space for eating. (FF #s 53, 72).

Transitions and Social Interactions Accommodations

Regarding accommodations to support social interactions and transitions, Parents are concerned that School did not provide three accommodations required by the IEP: (I) reminders to get restroom needs met, (II) “multiple ways to communicate with adults and peers, allow non-verbal communication,” and (III) “direct instruction and adult facilitation to positively interact with peers and adults so he is able to seek help when needed.” (FF # 82).

As detailed in the Findings of Fact, District provided reminders to get restroom needs met and allowed for multiple ways to communicate with adults and peers, including non-verbal communication in accordance with the IEP between August 27 and November 7, 2025. (FF #s 83-108). Student’s IEP did not require the implementation of direct instruction and adult facilitation

as an accommodation. (FF # 110). As such, District was under no obligation to provide this support as an accommodation. (FF # 111).

Therefore, there were no shortfalls regarding provision of social and transition accommodations between August 27 and November 7, 2025. (FF #s 94, 108, 111).

2. Prong 2: Were the Shortfalls Material?

Because there were two shortfalls in accommodations provided versus those required by Student's IEP, the CDE must next determine whether these shortfalls represent a material failure to implement the IEP such that Student was denied FAPE.

Here, there were only shortfalls in the provision of two out of 30 accommodations required by Student's IEP. (FF #s 12, 36, 53, 72, 81, 94, 108, 111). Of the two shortfalls for support in the cafeteria environment, Student did not receive extra time for eating on only one day (August 27, 2025) and did not receive a separate space for eating on only four days (August 27, August 29, September 2, and September 3, 2025). (FF #s 53, 72). School otherwise implemented Student's IEP accommodations with fidelity and School staff understood their responsibilities for implementing the IEP. (See Sections B and C above). Moreover, School responded to Parents' concerns regarding implementation of accommodations on the same days that Parents raised concerns, and School began implementing the accommodations effectively by the next day or next week. (FF #s 44-47, 62-63, 65-69). Student's accommodations in the cafeteria environment were important and, as such, were described as a separate category of accommodations. (FF #s 12-13). When Student did not eat, he was more prone to dysregulation, including becoming withdrawn, anxious, and overwhelmed. (FF # 13). However, on the four days when School was not consistently implementing these accommodations, Student was nonetheless able to eat his lunch during snack time. (FF # 67).

For these reasons, the CDE finds and concludes that the shortfalls were not material and that District therefore implemented Student's IEP as required by 34 C.F.R. § 300.323(c)(2); see *Van Duyn*, 502 F. 3d at 821 ("There is no statutory requirement of perfect adherence to the IEP.").

REMEDIES

The CDE concludes that District complied with the requirements of IDEA. Accordingly, no remedies are ordered.

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 31st day of December, 2025.

A handwritten signature in blue ink that reads "Elizabeth Stonehill". The signature is written in a cursive style with a large initial 'E'.

Elizabeth “EP” Stonehill
State Complaints Officer

APPENDIX

Complaint, pages 1-8

Response, pages 1-14

- Exhibit A: IEPs
- Exhibit B: N/A
- Exhibit C: Notices of Meetings
- Exhibit D: Prior Written Notices
- Exhibit E: Documentation from IEP Meetings
- Exhibit F: Schedule, Grades, and Attendance Records
- Exhibit G: District Calendar
- Exhibit H: District Policies
- Exhibit I: Correspondence
- Exhibit J: Contact Information
- Exhibit K: Verification of Delivery
- Exhibit L: Other Relevant Documents
- Exhibit M: Recording of 11/05/25 Meeting

Reply, pages 1-30

- Exhibit 1: Pre-Meeting Draft for 11/12/25 IEP Review Meeting
- Exhibit 2: Post-Meeting Draft for 11/12/25 IEP Review Meeting
- Exhibit 3: Complete Time-Stamped Texts Between Parents and Case Manager
- Exhibit 4: 10/27/2025 Meeting Transcription and Recording
- Exhibit 5: 11/03/25 Playground Conversation Transcription and Recording
- Exhibit 6: 11/03/25 Phone Call Transcription and Recording
- Exhibit 7: PSD Integrated Services Parent Handbook May 2025
- Exhibit 8: 11/05/25 IEP Compliance Concern Meeting Transcription and Recording
- Exhibit 9: 11/12/2025 IEP Review Meeting Transcription and Recording
- Exhibit 10: 11/18/2025 IEP Review Meeting Transcription and Recording
- Exhibit 11: Finalized IEP 2025
- Exhibit 12: February to October 2025 Progress Report
- Exhibit 13: Photos
- Exhibit 14: 10/23/25 Morning Drop-Off Transcription and Recording
- Exhibit 15: Seesaw Messages

Telephone Interviews

- Speech Language Pathologist: December 2, 2025
- Kindergarten Teacher: December 2, 2025
- Assistant Director of Integrated Services: December 2, 2025

- Case Manager: December 2, 2025
- Parents: December 8, 2025
- Paraprofessional 1: December 10, 2025
- Paraprofessional 2: December 10, 2025