

**PENNSYLVANIA DEPARTMENT OF EDUCATION
BUREAU OF SPECIAL EDUCATION
COMPLAINT INVESTIGATION REPORT**

LOCAL EDUCATIONAL AGENCY: School District of Philadelphia

DATE RECEIVED: August 28, 2025

DATE OF REPORT: October 27, 2025

COMPLAINANT: Attorneys

NAME: Rose Wehrman, Esquire
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RE: [REDACTED] et. al.

SPECIFIC COMPLAINT(S):

- Issue 1: During the 2024-2025 school year, the School District of Philadelphia (SDP) failed to implement the Student's and Similarly Situated Students' Individualized Education Programs (IEP) with regards to the provision of Speech and Language Therapy (SLT), Occupational Therapy (OT), and a 1:1 Personal Care Assistant (PCA).
- Issue 2: The SDP discriminated against the Student based on the Student's disability during the 2024-2025 school year.
- Issue 3: The SDP failed to afford the Parents an opportunity for parent participation in an IEP team meeting regarding the implementation of the Student's IEP which affected the provision of Free Appropriate Public Education (FAPE.)
- Issue 4: The SDP failed to provide the Student's Parents with progress monitoring.
- Issue 5: The SDP failed to provide the Parents with the Student's special education documents, including IEPs, Evaluation Reports, and Notices of Recommended Educational Placement, in the Parents' native language.
- Issue 6: When the Student transitioned to kindergarten in August 2024, the SDP failed to conduct a timely school-age evaluation.

During the course of this investigation, two additional issues were brought to the attention of this Advisor and has been added to this complaint.

- Issue 7: The Notice of Recommended Educational Placement/Prior Written Notices (NOREPs/PWNs) issued on August 27, 2024 does not correspond regarding the programming as described within the August 27, 2024 IEP.

APPLICABLE REGULATORY AUTHORITY:

Issue 1:

34 CFR Individuals with Disabilities Education Act (IDEA) § 300.17 Free appropriate public education.

Free appropriate public education or FAPE means special education and related services that—

- (a) Are provided at public expense, under public supervision and direction, and without charge;
- (b) Meet the standards of the SEA, including the requirements of this part;
- (c) Include an appropriate preschool, elementary school, or secondary school education in the State involved; and
- (d) Are provided in conformity with an individualized education program (IEP) that meets the requirements of §§300.320 through 300.324.

34 CFR IDEA § 300.39 Special education.

(a) General.

(1) Special education means specially designed instruction, at no cost to the parents, to meet the unique needs of a child with a disability, including -

- (i) Instruction conducted in the classroom, in the home, in hospitals and institutions, and in other settings; and
- (ii) Instruction in physical education.

(2) Special education includes each of the following, if the services otherwise meet the requirements of paragraph (a)(1) of this section -

- (i) Speech-language pathology services, or any other related service, if the service is considered special education rather than a related service under State standards;
- (ii) Travel training; and
- (iii) Vocational education.

(b) Individual special education terms defined. The terms in this definition are defined as follows:

(1) At no cost means that all specially-designed instruction is provided without charge, but does not preclude incidental fees that are normally charged to nondisabled students or their parents as a part of the regular education program.

(2) Physical education means -

- (i) The development of -
 - (A) Physical and motor fitness;
 - (B) Fundamental motor skills and patterns; and
 - (C) Skills in aquatics, dance, and individual and group games and sports (including intramural and lifetime sports); and
- (ii) Includes special physical education, adapted physical education, movement education, and motor development.

(3) Specially designed instruction means adapting, as appropriate to the needs of an eligible child under this part, the content, methodology, or delivery of instruction -

- (i) To address the unique needs of the child that result from the child's disability; and
- (ii) To ensure access of the child to the general curriculum, so that the child can meet the educational standards within the jurisdiction of the public agency that apply to all children.

(4) Travel training means providing instruction, as appropriate, to children with significant cognitive disabilities, and any other children with disabilities who require this instruction, to enable them to -

- (i) Develop an awareness of the environment in which they live; and
- (ii) Learn the skills necessary to move effectively and safely from place to place within that environment (e.g., in school, in the home, at work, and in the community).

(5) Vocational education means organized educational programs that are directly related to the preparation of individuals for paid or unpaid employment, or for additional preparation for a career not requiring a baccalaureate or advanced degree.

34 CFR IDEA § 300.34 Related Services.

(a) General. Related services means transportation and such developmental, corrective, and other supportive services as are required to assist a child with a disability to benefit from special education, and includes speech-language pathology and audiology services, interpreting services, psychological services, physical and occupational therapy, recreation, including therapeutic recreation, early identification and assessment of disabilities in children, counseling services, including rehabilitation counseling, orientation and mobility services, and medical services for diagnostic or evaluation purposes. Related services also include school health services and school nurse services, social work services in schools, and parent counseling and training

...
(c) Individual related services terms defined. The terms used in this definition are defined as follows:

...
(15) Speech-language pathology services includes -

- (i) Identification of children with speech or language impairments;
- (ii) Diagnosis and appraisal of specific speech or language impairments;
- (iii) Referral for medical or other professional attention necessary for the habilitation of speech or language impairments;
- (iv) Provision of speech and language services for the habilitation or prevention of communicative impairments; and
- (v) Counseling and guidance of parents, children, and teachers regarding speech and language impairments.

34 CFR IDEA § 300.323 When IEPs must be in effect.

(a) General. At the beginning of each school year, each public agency must have in effect, for each child with a disability within its jurisdiction, an IEP, as defined in § 300.320.

...
(d) Accessibility of child's IEP to teachers and others. Each public agency must ensure that—

- (1) The child's IEP is accessible to each regular education teacher, special education teacher, related services provider, and any other service provider who is responsible for its implementation; and
- (2) Each teacher and provider described in paragraph (d)(1) of this section is informed of—
 - (i) His or her specific responsibilities related to implementing the child's IEP; and
 - (ii) The specific accommodations, modifications, and supports that must be provided for the child in accordance with the IEP.

Issue 2:

34 CFR § 104.4 Discrimination prohibited.

(a) General. No qualified handicapped person shall, on the basis of handicap, be excluded from participation in, be denied the benefits of, or otherwise be subjected to discrimination under any program or activity which receives Federal financial assistance.

Issue 3:

34 CFR § 300.322 Parent participation.

(a) *Public agency responsibility—general.* Each public agency must take steps to ensure that one or both of the parents of a child with a disability are present at each IEP Team meeting or are afforded the opportunity to participate, including—

- (1) Notifying parents of the meeting early enough to ensure that they will have an opportunity to attend; and
- (2) Scheduling the meeting at a mutually agreed on time and place.

(b) *Information provided to parents.*

- (1) The notice required under paragraph (a)(1) of this section must—

- (i) Indicate the purpose, time, and location of the meeting and who will be in attendance; and
- (ii) Inform the parents of the provisions in § 300.321(a)(6) and (c) (relating to the participation of other individuals on the IEP Team who have knowledge or special expertise about the child), and § 300.321(f) (relating to the participation of the Part C service coordinator or other representatives of the Part C system at the initial IEP Team meeting for a child previously served under Part C of the Act)...

34 CFR IDEA § 300.501 Opportunity to Examine Records; Parent Participation in Meetings.

...

(b) Parent participation in meetings.

- (1) The parents of a child with a disability must be afforded an opportunity to participate in meetings with respect to -
 - (i) The identification, evaluation, and educational placement of the child; and
 - (ii) The provision of FAPE to the child.

Issue 4:

34 CFR IDEA § 300.320 Definition of individualized education program.

- (a) *General.* As used in this part, the term individualized education program or IEP means a written statement for each child with a disability that is developed, reviewed, and revised in a meeting in accordance with §§ 300.320 through 300.324, and that must include—
 - (1) A statement of the child's present levels of academic achievement and functional performance, including—
 - (i) How the child's disability affects the child's involvement and progress in the general education curriculum (i.e., the same curriculum as for nondisabled children); or
 - (ii) For preschool children, as appropriate, how the disability affects the child's participation in appropriate activities;
 - (2)
 - (i) A statement of measurable annual goals, including academic and functional goals designed to—
 - (A) Meet the child's needs that result from the child's disability to enable the child to be involved in and make progress in the general education curriculum; and
 - (B) Meet each of the child's other educational needs that result from the child's disability;
 - (ii) For children with disabilities who take alternate assessments aligned to alternate academic achievement standards, a description of benchmarks or short-term objectives;
 - (3) A description of—
 - (i) How the child's progress toward meeting the annual goals described in paragraph (2) of this section will be measured; and
 - (ii) When periodic reports on the progress the child is making toward meeting the annual goals (such as through the use of quarterly or other periodic reports, concurrent with the issuance of report cards) will be provided...

Issue 5:

34 CFR IDEA § 300.29 Native language.

- (a) Native language, when used with respect to an individual who is limited English proficient, means the following—
 - (1) The language normally used by that individual, or, in the case of a child, the language normally used by the parents of the child, except as provided in paragraph (a)(2) of this section...

34 CFR IDEA §300.503 Prior notice by the public agency; content of notice.

...

(c) Notice in understandable language.

- (1) The notice required under paragraph (a) of this section must be—

- (i) Written in language understandable to the general public; and
 - (ii) Provided in the native language of the parent or other mode of communication used by the parent, unless it is clearly not feasible to do so.
- (2) If the native language or other mode of communication of the parent is not a written language, the public agency must take steps to ensure—
- (i) That the notice is translated orally or by other means to the parent in his or her native language or other mode of communication;
 - (ii) That the parent understands the content of the notice; and
 - (iii) That there is written evidence that the requirements in paragraphs (c)(2)(i) and (ii) of this section have been met.

Issue 6:

34 CFR IDEA § 300.303 Reevaluations.

- (a) General. A public agency must ensure that a reevaluation of each child with a disability is conducted in accordance with §§ 300.304 through 300.311
- (1) If the public agency determines that the educational or related services needs, including improved academic achievement and functional performance, of the child warrant a reevaluation; or
 - (2) If the child's parent or teacher requests a reevaluation.
- (b) Limitation. A reevaluation conducted under paragraph (a) of this section—
- (1) May occur not more than once a year, unless the parent and the public agency agree otherwise; and
 - (2) Must occur at least once every 3 years, unless the parent and the public agency agree that a reevaluation is unnecessary.

22 Pa. Code § 14.124. Reevaluation.

- (a) The group of qualified professionals, which reviews the evaluation materials to determine whether the child is a child with a disability under 34 CFR 300.303 (relating to reevaluations), shall include a certified school psychologist when evaluating a child for autism, emotional disturbance, intellectual disability, multiple disabilities, other health impairment, specific learning disability and traumatic brain injury.
- (b) In addition to the requirements incorporated by reference in 34 CFR 300.303, the reevaluation time line will be 60-calendar days, except that the calendar days from the day after the last day of the spring school term up to and including the day before the first day of the subsequent fall school term will not be counted.
- (c) Students with disabilities who are identified as having an intellectual disability shall be reevaluated at least once every 2 years.
- (d) Copies of the reevaluation report shall be disseminated to the parents at least 10 school days prior to the meeting of the IEP team, unless this requirement is waived by a parent in writing.

Issue 7:

IDEA 34 CFR § 300.503 Prior notice by the public agency; content of notice.

- (a) *Notice*. Written notice that meets the requirements of paragraph (b) of this section must be given to the parents of a child with a disability a reasonable time before the public agency—
- (1) Proposes to initiate or change the identification, evaluation, or educational placement of the child or the provision of FAPE to the child; or
 - (2) Refuses to initiate or change the identification, evaluation, or educational placement of the child or the provision of FAPE to the child.
- (b) *Content of notice*. The notice required under paragraph (a) of this section must include—
- (1) A description of the action proposed or refused by the agency;
 - (2) An explanation of why the agency proposes or refuses to take the action;

- (3) A description of each evaluation procedure, assessment, record, or report the agency used as a basis for the proposed or refused action;
- (4) A statement that the parents of a child with a disability have protection under the procedural safeguards of this part and, if this notice is not an initial referral for evaluation, the means by which a copy of a description of the procedural safeguards can be obtained;
- (5) Sources for parents to contact to obtain assistance in understanding the provisions of this part;
- (6) A description of other options that the IEP Team considered and the reasons why those options were rejected; and
- (7) A description of other factors that are relevant to the agency's proposal or refusal.

...

SOURCES OF INFORMATION:

This Special Education Advisor, Janet L. Pelone:

- Reviewed the complaint letter sent by the Complainants and received by the Bureau of Special Education (BSE) on August 28, 2025.
- Interviewed the Complainants on September 4, 2025 via Microsoft Teams.
- Corresponded with the Complainants via email on September 11 and 16, 2025.
- Corresponded via email with the following individuals on September 11, 2025:
 - Dr. Tony B. Watlington, Sr.; Superintendent,
 - Dr. Elizabeth Farruggia; Deputy ODL,
 - Dr. Laurena Zeller; Executive Director of Special Education, ODL,
 - Brittini Jennings; Senior Project Manager ODL,
 - Christine Hilferty-Feeny, Director LN 1
 - Sherri L. Campbell; Advisor, Division of Monitoring and Improvement- East
- Corresponded via email with SDP staff on the following dates: September 12 and 29, 2025 and October 1, 15, 19, 20 and 21, 2025.
- Interviewed the following SDP Staff during a Microsoft Teams Meeting on October 1, 2025:
 - Christine Hilferty-Feeny, Director LN 1
 - Ashley Toborowski, Special Education Compliance Monitor, [REDACTED]
 - Alexandra Bethea, Director, Related Services
- Interviewed Bonita McCabe; Director, The ARC of Philadelphia, on October 14, 2025.
- Interviewed Diane Perry; Regional Manager, Parent Education and Advocacy Leadership Center, on October 15, 2025.
- Communicated with [REDACTED], Parent, on October 15, 2025, via telephone.
- Communicated with [REDACTED], Parent, on October 15 and 19, 2025, via email.
- Interviewed [REDACTED], Parents, on October 16, 2025, via telephone with a Language Line interpreter present.

- Interviewed Cathy Roccia-Meier; Vice President, Autism Sharing and Parenting, on October 16, 2025.
- Reviewed the following numbered documents:

Ref.	Document	Date	Source
1.	IFSP	April 17, 2024	SDP
2.	Invitation to Participate in the Individualized Education Program (IEP) Team Meeting or Other Meeting	August 27, 2024	SDP
3.	IEP	August 27, 2024	SDP
4.	Notice of Recommended Educational Placement/Prior Written Notice (NOREP/PWN)	August 27, 2025	SDP
5.	Permission to Reevaluate-Consent Form	October 10, 2024	SDP
6.	Progress Monitoring- Report of Progress	November 14, 2025	SDP
7.	Reevaluation Report (RR)	February 4, 2025	SDP
8.	WAIVER: 10 Day Evaluation Review	February 4, 2025	SDP
9.	Invitation to Participate IEP Team Meeting or Other Meeting	February 10, 2025	SDP
10.	IEP	February 19, 2025	SDP
11.	Positive Behavior Support Plan	February 19, 2025	SDP
12.	Progress Monitoring- Report of Progress	February 21, 2025	SDP
13.	Functional Behavioral Assessment (FBA)	February 24, 2025	SDP
14.	NOREP/PWN	February 24, 2025	SDP
15.	Progress Monitoring- Report of Progress	March 28, 2025	SDP
16.	Compensatory Education Agreement	March 2025	SDP
17.	Compensatory Education Agreement	March 2025	SDP
18.	NOREP/PWN	April 21, 2025	SDP
19.	NOREP/PWN	April 21, 2025	SDP
20.	Progress Monitoring- Report of Progress	June 13, 2025	SDP
21.	BSE Complaint	August 28, 2025	BSE
22.	Email	October 20, 2025	SD
23.	SDP School Calendar	2024-2025 School Year	SDP Website

INTRODUCTION:

The Student is 7 years old and attended [REDACTED] Elementary School ([REDACTED]) in Learning Network 3 (LN 3) in the SDP during the 2024-2025 school year as a transitioning kindergarten student. The Student was to receive Supplemental Autistic support with SLT, OT and a 1:1 Personal Care Assistant (PCA) as outlined in the Student's Early Intervention IEP and subsequent School Aged IEPs.

FINDINGS:

Issues 1 through 7:

1. SDP Staff initially reported to this Advisor that the Student was not included in their Early Intervention (EI) database and did not have access to his records to plan for the Student's programming for the 2024-2025 school year.

The Parents reported during the October 16, 2025, interview that they had contacted the SPECM to hold an IEP meeting prior to the start of the school year so they would know what was being recommended for the Student and were told that the SDP did not hold IEP meetings during the summer.

This Advisor contacted SDP Staff via email on October 20, 2025, to inquire about Parental contact during the summer of 2024 and was provided the following response: "...I do not have exact dates but approximations:

February 2024- Parent came into [REDACTED] inquiring about enrollment and services. Student was not on E.I. list. Team reached out to E.I. coordinator for paperwork on March 6, 2024

April 2024- Parent came up to [REDACTED] to inquire about E.I. transition. Told the parent the student was still not on E.I. list. and the directive was to wait until paperwork was uploaded.

May 2, 2024- Student's paperwork uploaded to [IEP software management system]. Email was sent to psychologists and related service providers to review documents on May 10, 2024.

I do not have official documentation or call log of when the parent came to [REDACTED] during the Spring of 2024."

2. An IFSP from the Student's EI programming is dated April 17, 2024 and contained the following with regards to related services:

"Early Intervention Service	...Start Date	...Frequency up to a maximum	Session Duration
Occupational Therapy	09/01/2023	2 times per 7 days	3 units per session
Speech Therapy	09/01/2023	2 times per 7 days	3 units per session..."

SDP Staff reported that this IFSP was implemented from August 26 - 27, 2024 and a NOREP/PWN was not provided to the Parents with this recommendation.

3. According to the SDP School Calendar, the first day of school was August 26, 2024.
4. SDP Staff reported that the PCA coverage was not provided to the Student from August 26, 2024 through October 19, 2024. Although SDP Staff reported a PCA had been hired and began working with the Student on October 20, 2024, this Advisor was not provided with documentation indicating this assignment.
5. SDP staff reported that although there was an OT vacancy during the 2024-2025 school year and the Student did receive some level of OT during March and April. This Advisor reviewed OT service logs for the Student from September through May and noted the following:

Month	OT Minutes Provided
September 2024	0

October 2024	0
November 2024	0
December 2024	0
January 2024	0
February 2025	0
March 2025	60
April 2025	60
May 2025	0

6. An Invitation to Participate in the Individualized Education Program (IEP) Team Meeting or Other Meeting is dated August 27, 2024 proposing and IEP meeting to be held on August 28, 2024. This Invitation was signed by the Parent on August 28, 2024 indicating the Parent would attend the IEP meeting.
7. An IEP is dated August 27, 2024, and contains the following under Section I. Special Considerations The IEP Team Must Consider Before Developing the IEP any Factors Checked as "Yes" Must be addressed in the IEP:
 "..."

D. Does [Student] need assistive technology and/or services?..."
 The box is checked "Yes."

The Present Levels of Academic Achievement and Functional Performance contain the following regarding OT and Speech: "...Information was taken from most current IFSP (9/2024)..."

SDP Staff reported that the Parent was not made aware of the staffing shortages with SLT, OT and 1:1 PCA for the Student during the IEP meeting as it was the start of the school year and they believed the staffing would be filled within a reasonable timeframe.

Parents reported they were not made aware of the staffing shortage during the IEP meeting.

The Related Services section of the IEP contains the following:

"Service	Location	Frequency	Projected Beginning Date	Anticipated Duration
1:1 Adult Assistant provided by the School District of Philadelphia, authorized by the IEP Team-Individual	In the Regular Education Classroom	1695 minutes per week	8/28/2024	8/01/2025
Occupational Therapy-Individual	Inside the Regular Education Classroom	90 minutes/week	8/28/2024	8/01/2025
Speech/Language Therapy	Inside the Regular Education Classroom	90 minutes/week	8/28/2024	8/01/2025..."

8. A NOREP/PWN is dated August 27, 2024 and the following is listed in section 2. A description of the action proposed or refused by the LEA: "...SDP is proposing to ADOPT and implement the current Early Intervention IEP dated 04/17/2024, including all specialized services, supports, goals and objectives specified therein. [Student] will be assigned to Supplemental Autistic Support. [Student] will receive 90 minutes a week of OT and 90 minutes a week of Speech therapy. [Student] will also receive 399 minutes per week of 1:1 support..."
9. A PTRE- Consent Form is dated September 6, 2024 and proposed the following assessment tools, tests and procedures:

"...Skill Area	Method of Evaluation (Procedures)
Psychological Functioning	Measures of psychological functioning
Literacy	Measures of academic achievement- literacy
Math	Measures of academic achievement- math
Speech-Language	Measures of oral communication
Behavior	Measures of behavioral performance/social emotional functioning
Adaptive Behavior	Measures of adaptive behavior
Motor	Measures of need of school based ~~physical therapy~~ occupational (handwritten)

FBA added 11/4/2024 (handwritten)

The document indicates that the LEA signed the document on August 27, 2024 and the Parent provided permission for the reevaluation on the same date at the IEP meeting.

10. A RR is dated February 4, 2025 and does not contain a Speech-Language evaluation.
11. An FBA is dated February 24, 2025. SDP reports this was the date the FBA was finalized, and it was discussed at the February 19, 2025.
12. An Invitation to Participate in the IEP Team Meeting or Other Meeting is dated February 10, 2025 proposing an IEP meeting to be held on February 19, 2025.
13. An IEP is dated February 19, 2025, and contains the following under Section I. Special Considerations The IEP Team Must Consider Before Developing the IEP any Factors Checked as "Yes" Must be addressed in the IEP:
 "...
 D. Does [Student] need assistive technology and/or services?..."
 The box is checked "Yes."

The Present Levels of Academic Achievement and Functional Performance contain the following regarding OT and Speech: "...Information was taken from most current IFSP (9/2024)..."

SDP Staff reported that although there were continued staffing shortages with OT and Speech, compensatory services were not discussed during the IEP meeting, noting it was outlined in the parental concerns section of the IEP as listed below:

"Parental concerns for enhancing the education of the student [Student's] parent attended the meeting on 2/19. [Student's] parents are both very concerned about the lack of related services being provided to [Student's] since the beginning of the school year. They said [Student] has regressed in many areas due to the lack of related services. They would like information on when related service providers will start servicing him again..."

The Related Services section of the IEP contains the following:

"Service	Location	Frequency	Projected Beginning Date	Anticipated Duration
1:1 Adult Assistant provided by the School District of Philadelphia, authorized by the IEP Team-Individual	In the Regular Education Classroom	1695 minutes per week	8/28/2024	8/01/2025
Occupational Therapy-Individual	Inside the Regular Education Classroom	120 minutes/month	8/28/2024	8/01/2025
Speech/Language Therapy	Inside the Regular Education Classroom	90 minutes/week	8/28/2024	8/01/2025..."

14. A Positive Behavior Support Plan is dated February 19, 2025.
15. A NOREP/PWN is dated February 24, 2025 and the following is listed in section 2. A description of the action proposed or refused by the LEA: "...The school team is proposing that [Student] will be assigned to Supplemental Autistic Support for 1450 minutes per week.. [Student] will continue to receive 90 minutes a week of Speech therapy until a speech evaluation can be completed. [Student] will also receive 399 minutes per week of 1:1 support..."

OT was not mentioned in the proposal.
16. A Compensatory Education Agreement is dated March 2025 and states the following: "The School District of Philadelphia has considered Compensatory Education for this student for the following reasons: A gap in **speech and language services** as outlined in the student's IEP during the 2024-2025 school year from August 2024 to December 2024. The School District of Philadelphia has determined the [Student] is eligible for 20.00 hours of compensatory education..."
17. A Compensatory Education Agreement is dated March 2025 and states the following: "The School District of Philadelphia has considered Compensatory Education for this student for the following reasons: A gap in **Occupational Therapy services** as outlined in the student's IEP during the 2024-2025 school year from August 2024 to December 2024. The School District of Philadelphia has determined the [Student] is eligible for 30.00 hours of compensatory education..."
18. A NOREP/PWN is dated April 21, 2025 and the following is listed in section 2. A description of the action proposed or refused by the LEA: "...Due to Missed Speech/Language Therapy Services, [Student] is entitled to 20.00 hours of compensatory education for speech/language services." The parent signed agreement to this NOREP/PWN on June 10, 2025.
19. SDP Staff reported that compensatory education was discussed between Parent and SDP counsel and that counsel for the Parent wanted to wait until the results of this investigation were concluded to continue that discussion.

20. SDP Staff reported that Progress Monitoring- Reports of Progress were provided to the Parent with report cards and sent home with the student quarterly.

During an interview on October 16, 2025, the Parents reported they were unclear as to whether they received progress monitoring reports.

A review of Progress monitoring data collection and reports of progress indicates that OT progress reports were sent on the following dates: March 28, 2025 and June 13, 2025.

A review of Progress monitoring data collection and reports of progress indicates that SLT progress reports were sent on the following dates: November 11, 2024, February 2, 2025 and March 28, 2025 and June 13, 2025. The comments section for all four quarters contains the following: " Not Introduced Due to staffing shortages, speech and language progress monitoring has not been updated. Service minutes will remain unchanged in the interim.

21. SDP Staff and the Student's Parents reported that translators were provided during all IEP meetings and phone calls with the Parents.

SDP Staff reported that one Parent told Staff they wanted the paperwork in English. Parents indicated that were unable to recall that conversation.

SDP Staff reported that the Progress monitoring data collection and reports of progress were not translated in verbal or written form and followed the direction from the parent regarding translation.

22. A Related Service Delivery Survey was completed by the Speech Therapists assigned to the Similarly Students for the 2024-2025 school year and a random sampling of responses indicate the following:

Were you provided the Student's IEP to review with regards to the SDI at the beginning of the 2024-2025 school year?
• 9 out of 10 personnel, or 90 percent of the personnel, answered, "Yes." • 1 out of 10 personnel, or 10 percent of the personnel, answered, " I don't know."
If you were provided the Student's IEP at the beginning of the 2024-2025 school year, how was the IEP provided?
• " Hard copy and soft copy" • "via easy system" • "I looked them up myself on EasyIEP" • "i received the IEP at a glance" • "Email" • "IEPs were available in the EZ system searchable by student's name/ID number" • "Information can be located in the ez system if it is uploaded. If it isn't then that information is simply not there and not accessible (sic)." • "I am able to access student's IEPs when I add myself to their IEP team. I retrieve and review them myself using the EasyIEP system". • "I printed out each student's IEP at a glance and organized it in a binder labeled "IEPs at a Glance". I reviewed each student's goal areas and corresponding SDIs. I ensured each student had access to the support that they needed for their functional communication within their academic environment."
If an IEP revision occurred, how was this shared with you?
• "Email or conversation with SPECM"

• "On occasion, I would receive communication from the team members on the case via e-mail. More often than not, I would have to look for it." • "Email, I usually attended IEP meetings" • "Typically revisions are accessible via the ez system." • "Usually by participating in an IEP meeting; and/or through discussion with other team members" • "I was invited to a meeting or was told via email by the case manager" • "sometimes it was not, other times email or in person communication." • "Email" • "Shared by SPECM about revision / amended IEP"
Please explain how you implemented the following RS of Speech and Language Therapy (SLT) for the students assigned to you for the 2024-2025 school year: • "Collaborating with other service providers/classroom teachers to provide strategies for carry over, providing therapy at the service level that is in their IEP, creating visuals/materials that students can take home/to their classroom to practice their targeted skills, attending IEP meetings and determining appropriate supports/SDIs that they may need based on their speech and language skills" • "looked at the student's IEP and service minutes and if they were group or individual. I usually pulled them out of the classroom to service them." • "For the students assigned to me for the 2024-2025 school year, I implemented both push-in and pull-out therapy. I primarily pushed-in to low-incidence classrooms (Autistic support, life skills) and pulled students from other classrooms into the speech therapy room to target their goals each week." • "I supported by getting him on zoom for virtual speech" • "Supported IEP goal" • "Provided direct push in or pull out therapy in group and individual sessions as the students' IEPs designated." • "The student has a talker, which he using every day, also their was daily speech with the speech therapist." • "direct (typically group of 2) via teletherapy" • "Showing the student different objects and having him try to tell me what the object is and the sounds. Everything is copied into a file to keep for his progress."
If you were/will be absent for an extended period of time, how was/will the SLT be provided to your assigned caseload? • "I was not absent for an extended period of time." • "I was not absent for an extended period of time during the 2024-2025" • "I was on maternity leave with 89 day unpaid leave from January through the end of the school year. I informed HR, my supervisors in the Office of Diverse Learners, and my principal of my planned maternity leave and followed up upon my delivery. I was never informed of the district's plan to provide services to my caseload during my leave" • "Make-up sessions" • "Fortunately, I was no"t absent for an extended period of time during the 2024-2025 school year" • "No coverage was provided for my maternity leave from September 20th to December 13th. Returned on 12/16 from maternity leave." • "Never been absent for extended period of time" • "To be honest I am not sure. The departments are under staffed or have high caseload numbers. I assume it is up to us to makeup the services or provide comp ed." • "N/A - was not absent for extended period of time" • "I wasn't absent for an extended period of time during the 2024-2025 school year"
If you would have been absent or will be absent for an extended period of time, was/will the Parent/parents be notified?

- "No"
- "Yes"
- "I don't remember"
- "I don't remember"
- "Yes"
- "No"
- "No"
- "No"
- "I don't remember"
- "I don't remember"

23. A Related Service Delivery Survey was completed by the Occupational Therapists assigned to the Similarly Students for the 2024-2025 school year and a random sampling of responses indicate the following:

Were you provided the Student's IEP to review with regards to the SDI at the beginning of the 2024-2025 school year?

- 10 out of 10 personnel, or 100 percent of the personnel, answered, "Yes."

If you were provided the Student's IEP at the beginning of the 2024-2025 school year, how was the IEP provided?

- "I found them on EASY. I confirmed the list with the SPECM at the school for students with OT, then found them on EASY to review evals/IEPs"
- "Online Easy System"
- "I have access to documentation in Easy system"
- "IEPs were available in the EZ system searchable by student's name/ID number"
- "yes, we have access to our IEP system"
- "I was provided this information online via the easy system."
- "They were provided through the EASY system."
- "via Easy IEP system"
- "Access through EASY IEP"
- "Provided a caseload, searched IEPs via EASYIEP"

If an IEP revision occurred, how was this shared with you?

- "Depends. Sometimes these things were shared amongst the team. Sometimes they were shared individually by the person who made the change. Sometimes we were informed last minute depending on the situation."
- "Email sent out to team with date of meeting and date that revisions needed to be completed."
- "An IEP revision occurred with either via email through docu-sign, or through email from the SPECM"
- "through easy"
- "May have been shared verbally or via email and then I would access in EasyIEP"
- "Calendar invite from SPECM and school team"
- "I participated in the IEP revision meetings in person or virtually."
- "IEP meeting with the school team and parent/guardian"
- "Email or I was told by the person changing the IEP."
- "Some schools I would be told of upcoming meeting for revision and be a part. Other schools I would not be alerted of upcoming revisions and would have to stumble upon the updated IEP myself in documents."

Please explain how you implemented the following RS of Occupational Therapy (OT) for the students assigned to you for the 2024-2025 school year:
provided 15-30 minute sessions (consult and direct) based on IEP needs

- "I provided direct service, evaluations, indirect service, IEP meetings, informal team meetings to review early intervention list, consultation in the classroom, consulting staff especially in the new AS classroom with a new teacher. I spent a lot of time in the new AS class and helping the AS teacher create structure and review sensory strategies. Ordering equipment for the AS room for the principal."
- "Direct individual - working with students one on one by either pushing in to their environment or pulling them out
Direct group - working with students in groups of 2 or 2+ students
Collateral/consult - checked in with student directly or through collaborating with teacher"
- "Direct service sessions that target skills in need for the student to attain their IEP goals: inside or outside the classroom, individual or group as specified on the student's IEP. Consultation/support to school personnel: making or providing materials to support sensory processing and attention, implementing SDI, collaboration with teachers
Preparing their annual/review IEPs, progress monitoring, and development of goals and SDI"
- "Through direct service (push in and/or pull out depending on student needs), and/or consultation with the classroom staff depending on student's IEP."
- "The schools that make up my caseload are assigned at the start of the year. I determined which students at each of my assigned schools received OT, and added them to my case. I added each student to my schedule based upon their service frequency, as indicated in their IEP (e.g., 90 mins/month). I followed this schedule to provide OT sessions as indicate in students' IEPs. OT sessions targeted skills needed to reach IEP goals."
- "I provided direct and indirect OT services as per each student's IEP"
- "I provided direct services in the classroom or pull-out sessions in the therapy room. I provided consultative services in the classroom. I completed documentation including daily session notes, monthly summaries, progress reports, and ACCESS billing. I updated IEPs, completed testing, and completed Evaluations. I participated in evaluation meetings and IEP meetings. I screened students. I collaborated with teachers to implement sensory strategies."
- "I implemented based off of their IEP (inside regular education classroom/ outside the regular education classroom) and where they showed the most need or room for improvement. If a student had difficulty participating and functioning in the classroom, I would push in for services. If a student required more strengthening, coordination, or overall fine motor work, I would pull them for services to a quiet area to focus on those skills needed to help them perform in the classroom. I would let the teacher(s) know what was worked on and what works to help implement it in their daily routine. What was worked on specifically in those sessions was related to general SDIs, goal related SDIs, or the students goals. Sessions would generally begin with fine motor/sensory motor warm up prior to working on goals. Adaptive materials were provided based off the IEP and student's success in trial with OT."
- "I provided OT services directly and via consultation in the 2024-2025 school year. Some students were seen individually, and some students were seen in small groups (2 students max) to address their IEP goals. Students were either seen in the AS classroom or in the OT therapy room. Some students were seen via consult - which included classroom observations, speaking with teachers/staff, and providing strategies/materials. Some direct students also required frequent check-ins with teachers, where I would also provide materials, strategies, visuals, etc. as needed."
- "I provided individual and group services according to the IEPs"

If you were/will be absent for an extended period of time, how was/will the OT be provided to your assigned caseload?

- "N/A (started in November 2024)"
- "N/A"
- "N/A"

• "I was not absent for an extended period of time." • "I have never been out for extended periods. If I were to be out for an extended period I would reach out to my OT leads, School SPECiMs, and Principals to let them know." • "I was not absent for an extended period of time." • "N/A" • "N/A" • "N/A - was not absent for extended period of time" • "I believe the schools were partially covered by another OT at the start of the year, when I was on parental leave."
If you would have been absent or will be absent for an extended period of time, was/will the Parent/parents be notified? • "No" • "I don't remember." • "I don't remember." • "I don't remember." • "I don't remember." • "Yes" • "Yes" • "I don't remember." • "I don't remember." • "I don't remember."

24. A Related Service Delivery Survey was completed by the PCAs assigned to the Similarly Students for the 2024-2025 school year and a random sampling of responses indicate the following:

Were you provided the Student's IEP to review with regards to the SDI at the beginning of the 2024-2025 school year? • 5 out of 10 personnel, or 50 percent of the personnel, answered, "Yes." • 4 out of 10 personnel, or 40 percent of the personnel, answered, "I don't remember" • 1 out of 10 personnel, or 10 percent of the personnel, answered, "No"
If you were provided the Student's IEP at the beginning of the 2024-2025 school year, how was the IEP provided? • "As the IEP at a Glance." • "Through the teacher" • "They were provided in paper form." • "teacher gave it to me" • "shared via email" • "Email" • "NA" • "N/a" • "One to one" • "I my email"
If an IEP revision occurred, how was this shared with you? • " N/A" • "Through the teacher" • "Paper copies were provided." • "Teacher" • "shared via emial (sic)" • "Email" • "NA" • "N/a"

• "Not sure" • "My email"
Please explain how you implemented the following RS of PCA for the student assigned to you for the 2024-2025 school year: • "N/A" • "N/A" • "I modeled error corrections, used visual supports, and followed SDI's from the IEP." • "helped student express [Student] more calmly" • "N/A" • "Communication book & speech iPad device" • "NA" • "N/a" • "Used AAC device" • "I sat next to [Student] all day"
If you were/will be absent for an extended period of time, how was/will PCA Support be provided to your assigned student? • "N/A" • "N/A" • "I modeled error corrections, used visual supports, and followed SDI's from the IEP." • "helped student express [Student] more calmly" • "N/A" • "Communication book & speech iPad device" • "NA" • "N/a" • "Used AAC device" • "I sat next to [Student] all day"
If you would have been absent or will be absent for an extended period of time, was/will the Parent/parents be notified? • "N/A" • "Through the substitute" • "N/A" • "No" • "n/a" • "Sub was requested" • "NA" • "N/a" • "Wasn't absent" • "N/A"

25. A random sampling review of files for 40 similarly situated students was conducted on October 7, 2025 yielded the following results:

Student #	SLT is included in the IEP, the location, frequency, projected beginning date, and anticipated duration of	SLT was provided during the 2024-2025 school year, as evidenced by service logs and	OT is included in the IEP, the location, frequency, projected beginning date, and anticipated duration of	OT was provided during the 2024-2025 school year, as evidenced by service	PCA Provided Yes or No	Compensatory Education Owed? Yes or No	Compensatory Education Offered? Yes or No or N/A

	services are present. Yes or No	progress reporting. Yes or No	services are present. Yes or No	logs and progress reporting. Yes or No			
1.	Yes	No	Yes	No	Yes	Yes	Yes
2.	Yes	No	Yes	No	Yes	Yes	No
3.	Yes	No	Yes	No	Yes	Yes	No
4.	Yes	Yes	Yes	No	Yes	Yes	No
5.	Yes	No	Yes	No	No	Yes	No
6.	Yes	Yes	Yes	Yes	No	Yes	No
7.	Yes	No	Yes	No	No	Yes	No
8.	Yes	Yes	Yes	No	Yes	Yes	No
9.	Yes	Yes	Yes	No	Yes	Yes	No
10.	Yes	No	Yes	No	Yes	Yes	No
11.	Yes	Yes	Yes	No	Yes	Yes	No
12.	Yes	No	Yes	No	No	Yes	No
13.	Yes	No	Yes	Yes	Yes	Yes	No
14.	Yes	Yes	Yes	No	Yes	Yes	No
15.	Yes	No	Yes	Yes	Yes	Yes	No
16.	Yes	No	Yes	No	Yes	Yes	No
17.	Yes	No	Yes	Yes	Yes	Yes	No
18.	Yes	Yes	Yes	Yes	Yes	No	No
19.	Yes	No	Yes	No	No	Yes	No
20.	Yes	No	Yes	Yes	Yes	Yes	No
21.	Yes	No	Yes	No	Yes	Yes	No
22.	Yes	No	Yes	Yes	Yes	Yes	No
23.	Yes	No	Yes	Yes	Yes	Yes	No
24.	Yes	No	Yes	Yes	Yes	Yes	No
25.	Yes	No	Yes	Yes	Yes	Yes	No
26.	Yes	No	Yes	No	No	Yes	No
27.	Yes	No	Yes	Yes	Yes	Yes	No
28.	Yes	No	Yes	Yes	Yes	Yes	No
29.	Yes	No	Yes	No	Yes	Yes	No
30.	Yes	No	Yes	Yes	Yes	Yes	No
31.	Yes	No	Yes	No	No	Yes	No
32.	Yes	Yes	Yes	No	Yes	Yes	No
33.	Yes	No	Yes	Yes	Yes	Yes	No
34.	Yes	No	Yes	No	No	Yes	No
35.	Yes	No	Yes	No	No	Yes	No
36.	Yes	No	Yes	No	Yes	Yes	No
37.	Yes	No	Yes	Yes	Yes	Yes	No
38.	Yes	Yes	Yes	No	Yes	Yes	No
39.	Yes	No	Yes	No	Yes	Yes	No
40.	Yes	No	Yes	No	Yes	Yes	No

CONCLUSIONS:

Issue 1:

The SDP was unable to demonstrate compliance with 34 CFR IDEA § 300.323(a).

The SDP was unable to provide evidence that the Student received the related service of a 1:1 PCA from August 26, 2024 through June 13, 2025.

The SDP was unable to provide evidence that the Student received SLT and access to the Student's AAC device, due to a vacancy. The IEP team did not discuss assistive technology and/or services as outlined in the Student's IEP.

The SDP was unable to provide evidence that the Student received OT as outlined in the Student's IEP. The Student was to receive 90 minutes per week from August 27, 2024 through February 23, 2025 and 120 minutes per month from February 24, 2025 through June 13, 2025 or 2,460 minutes during the 2024-2025 school year. A review of OT provider logs shows that the Student received 120 minutes during the 2024-2025 school year, which is 2,700 minutes less than the Student was to receive.

The SDP was unable to provide evidence that the Similarly Situated Students' (SSS) received the related services of SLT, OT a PCA as outlined in their IEPs.

As a result of the failure to provide related services, the Student and Similarly Situated Students are owed compensatory education.

Issue 2:

The SDP was able to demonstrate compliance with 34 CFR § 104.4.

The SDP acknowledged that staffing vacancies occurred district-wide throughout the 2024-2025 school year, impacting regular education and special education staff and students. The SDP made ongoing efforts to fill the vacancies throughout the course of the 2024-2025 school year by recruiting and hiring staff and utilizing agencies for related services. The impact of this on the Student's IEP services was communicated to the Parent throughout multiple contacts and documents, and the issue is now being addressed through the State complaint. Although the Student did not receive all of the related services, as outlined in the Student's IEP dated August 27, 2024, the SDP's failures to fully implement the IEP resulted from district-wide staffing shortages, rather than actions taken by reason of the Student's disability.

Issue 3:

The SDP was able to demonstrate compliance with 34 CFR IDEA § 300.501(b) and 34 CFR IDEA § 300.322(a) and (b).

The SDP issued invitations to the Parents on August 27, 2024 and February 10, 2025. The invitations were issued early enough to ensure attendance and indicated the purpose, time, location and who would be in attendance at the meeting. IEP meetings were held on August 27, 2024 and February 19, 2025, which included the Parents.

Issue 4:

The SDP was unable to demonstrate compliance with 34 CFR IDEA § 300.320(a)(3).

The IEPs throughout the 2024-2025 school year include descriptions of how the Student's progress toward meeting the annual goals and will be measured; and when periodic reports on the progress the Student is making toward meeting the annual goals will be provided. However, the progress reports were not completed in their entirety and lacked evidence of the provision to the parent.

Issue 5:

The SDP was able to demonstrate compliance with 34 CFR IDEA §300.503 (c) and 34 CFR IDEA §300.29.

SDP personnel explained and Parents confirmed that the NOREP/PWN dated August 27, 2024; February 24, 2025; and April 21, 2025, were interpreted to Parent(s).

Issue 6:

The SDP was unable to demonstrate compliance with the following regulations: 34 CFR IDEA § 300.303 and 22 Pa. Code § 14.124.

The SDP issued a PTRE to conduct a comprehensive psychoeducational evaluation and received consent from the Parent on October 10, 2024. The SDP added an FBA to the comprehensive psychoeducational evaluation and received consent dated October 10, 2024. This evaluation should have been completed on or before December 9, 2024. The Parent was provided with an RR that did not contain an FBA on February 4, 2025. An FBA was provided to the parent on February 19, 2025.

Issue 7:

The SDP was unable to demonstrate compliance with the following regulations: 34 CFR § 300.503(a) and (b)(1).

The SDP acknowledged they implemented the IFSP as a provision of FAPE for the Student from August 26, 2024 through August 27, 2024 until a School Age IEP was developed and approved by the Parent on August 27, 2024 without providing prior written notice to the Parent.

The August 27, 2024 IEP contains OT, SLT and a 1:1 PCA as related services and the September 30, 2024 NOREP contains the adoption of the IFSP, including OT and SLT as the proposed action.

DISCUSSION:

This Advisor began the investigation with the understanding that the Student did not need assistive technology and/or services and conducted a file review of Similarly Situated Students who were not identified by the SDP as needing an AAC device. Upon review of the files for the 40 Students, this Advisor noted that many of the Students, including the named Student, required assistive technology and/or services as noted in Section I of their IEPs.

To ensure that SDP are implementing the strategies learned in the required trainings and corrective action, the BSE will be conducting a file review specifically the implementation of related services occurs according to state and federal regulations, during the 2026-2027 school year.

Additionally, LN Directors and the Director of Related Services shall meet quarterly with the BSE Regional Special Education Advisors to present the tracking system, review current data, and develop or revise an action plan to address any identified service delays or disruptions. The Director Related Services will maintain records of these meetings and ensure corrective measures are implemented in a timely manner to maintain compliance. These records will be shared by the Director of Related Services with the Executive Director of Special Education quarterly for review and oversight.

The Superintendent or Designee shall provide the Education Law Center with quarterly updates with regards to the provision of related services; which includes service disruptions.

Based on these ongoing oversight efforts, the BSE will determine if any further corrective action is warranted.

CLOSURE/CORRECTIVE ACTION AND VERIFICATION:

Issue 1: Corrective action is required.

- A. The Student is eligible for compensatory education services as a remedy to the educational loss due to the lack of provision of speech and language therapy; including an IEP team review of assistive technology and/or services as noted in Section I of their IEPs, occupational therapy and a PCA during the 2024-2025 school year. The Superintendent or Designee shall convene an IEP meeting for the purpose of developing a plan for compensatory education as a remedy to the educational loss, and to issue a NOREP/PWN to the Parent/Guardian to approve or disapprove the compensatory education agreement.

The compensatory education shall be in addition to, and shall not supplant IEP supports and services, that should be appropriately provided by the SDP through the Student's IEP to assure a meaningful educational process. The exact nature, delivery schedule and logistics of the compensatory education are to be determined at the IEP meeting, based on the Student's needs. Verification of this corrective action is to be a copy of the plan for compensatory education attached to the student's IEP. The district must forward a copy of the compensatory education agreement to this Advisor by **January 16, 2026**. The school district may use the attached compensatory education plan agreement format for the corrective action. If the parties cannot agree on the schedule for the completion of the compensatory education, they shall contact Dr. Alyse M. Watson, Division Chief, at alywatson@pa.gov who shall determine the process for the completion of this compensatory education award.

- B. The Similarly Situated Students are eligible for compensatory education services as a remedy to the educational loss due to the lack of provision of one or more of the following: speech and language therapy; including an IEP team review of assistive technology and/or services as noted in Section I of their IEPs, occupational therapy and a PCA during the 2024-2025 school year. The Superintendent or Designee shall convene an IEP meeting for the purpose of developing a plan for compensatory education as a remedy to the educational loss, and to issue a NOREP/PWN to the Parents/Guardians to approve or disapprove the compensatory education agreement.

The compensatory education shall be in addition to, and shall not supplant IEP supports and services, that should be appropriately provided by the SDP through the Students' IEPs to assure a meaningful educational process. The exact nature, delivery schedule and logistics of the compensatory education are to be determined at the IEP meeting, based on the Student's needs. Verification of this corrective action is to be a copy of the plan for compensatory education attached to the student's IEP. The district must forward a copy of the compensatory education agreements to this Advisor by **January 16, 2026**. The school district may use the attached compensatory education plan agreement format for the corrective action. If the parties cannot agree on the schedule for the completion of the compensatory education, they shall contact Dr. Alyse M. Watson, Division Chief, at alywatson@pa.gov who shall determine the process for the completion of this compensatory education award.

- C. The Superintendent or Designee shall establish a written procedure compliant with 34 CFR IDEA § 300.323(a) addressing the provision of related services, including timely notification to parents/guardians if there is a service delay or disruption of related services. The procedure shall include, but is not limited to, a clearly documented IEP team decision regarding compensatory services for missed services.

The written procedure shall be sent via memorandum to all appropriate professional school employees and administrators and training conducted by the Superintendent or Designee on or before **January 16, 2026**. A Copy of the procedure, memorandum, and confirmation of receipt of the memorandum and training of the SDP staff in this procedure shall be provided to this Advisor as verification of the corrective action.

Issue 2: None required.

Issue 3: None required.

Issue 4: Corrective action is required.

The Superintendent or Designee shall provide training to all relevant personnel on the requirements for progress reporting, as per 34 CFR IDEA § 300.320(a)(3), regarding the collection of data along with the development and issuance of progress reports and issue a follow-up memorandum/email to all relevant staff to ensure compliance with the regulation cited above.

Issue 5: None required.

Issues 6 and 7: Corrective action is required.

- A. The Superintendent or Designee shall develop written procedures and staff training to address the following in compliance with regulations 34 CFR IDEA § 300.303, 34 CFR § 300.503(a) and (b), and 22 Pa. Code § 14.124 regarding the following topics:
- RR timelines
 - PWN prior to IFSP implementation by school age LEA IEPs
 - Corresponding NOREPs

The written procedures shall be sent via memorandum to all appropriate LN3 professional school employees and administrators and training conducted by the Superintendent or Designee on or before **January 16, 2026**. A Copy of the procedures, memorandum, and confirmation of receipt of the memorandums and trainings of the SDP staff in these procedures shall be provided to this Advisor as verification of the corrective action.

Janet L. Pelone
Special Education Advisor
Division of Monitoring & Improvement – East
717-329-0915
jpelone@pa.gov

NOTICE: In accordance with federal regulations, this report constitutes the PDE's final decision with regard to this complaint.

If either party disagrees with the conclusions in the Complaint Investigation Report (CIR), the party has the right to submit a written request for reconsideration with additional information either not considered or not available at the time of the investigation. The written request for reconsideration must be submitted within 10-calendar days of the date of the CIR.

An LEA must implement any corrective actions ordered in the CIR without waiting for the BSE's decision on the request for reconsideration.

ENCLOSURES:

Basic Education Circular – Special Education Compliance
Form – Completion of Corrective Action
Form – Compensatory Education Format
Confidential Student List (provided to LEA in a separate email)

cc: Dr. Tony B. Watlington, Sr., Superintendent
Dr. Elizabeth Farruggia, Deputy Chief of Specialized Services, Office of Diverse Learners (ODL)
Dr. Laurena Zeller, Executive Director of Special Education, ODL
Alexandra Bethea, Director of Related Services, ODL
Brittini Jennings, Senior Project Manager, ODL
[REDACTED]
Dr. Alyse M. Watson, Chief, Division of Monitoring and Improvement – East
Sherri L. Campbell, Special Education Advisor, Division of Monitoring and Improvement – East
Karen Newsome, Special Education Advisor, Division of Monitoring and Improvement – Philadelphia
Central file