



FAPE for Students with Severe Disabilities:  
Issues of which to be Wary  
from a Legal Perspective

ACSA Every Child Counts Symposium

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# Challenges to Meeting FAPE Requirements for Severely Disabled Students

“Always been there,” but still just as important today...

- Satisfaction of LRE Requirements
- Clear Written Offers of FAPE That Satisfy Procedural and Substantive Requirements
- Appropriate Goals and Services
- Sufficient Parental Participation

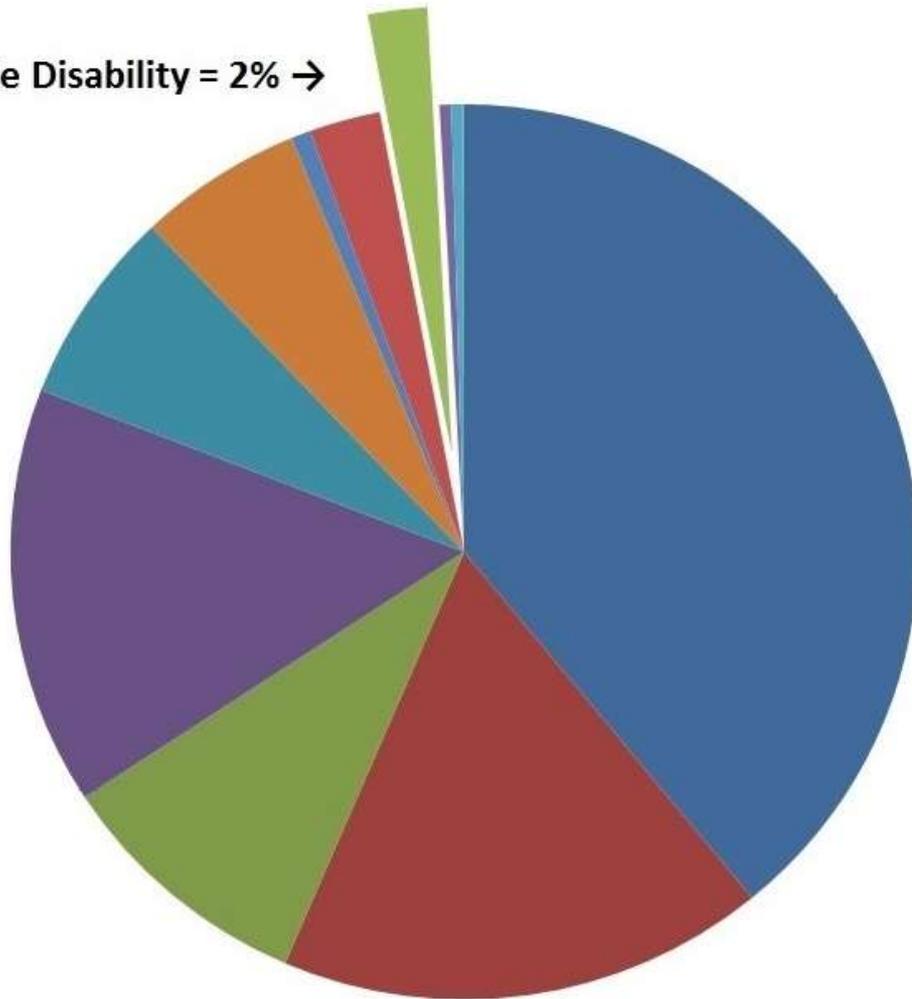
“New-ish” Requirements...

- Educational programming that is “appropriately ambitious” under *Endrew F*
- Alignment of Goals with Common Core Standards
- California Alternate Assessment (CAA) Measures of Achievement



# 2015-16 US Special Ed Population by Eligibility

Multiple Disability = 2% →



- Specific Learning Disability 38.6%
- Speech & Language Impairment 17.2%
- Autism 9.2%
- Other Health Impairment 15%
- Intellectual Disability 6.9%
- Emotional Disorder 5.8%
- Orthopedic Impairment 0.7%
- Developmental Delay 2.5%
- Multiple Disability 2%
- Visual Impairments 0.4%
- Traumatic Brain Injury 0.4%
- Deaf Blindness 0.02%

\*all students between the ages of 6-21  
\*most recently released information

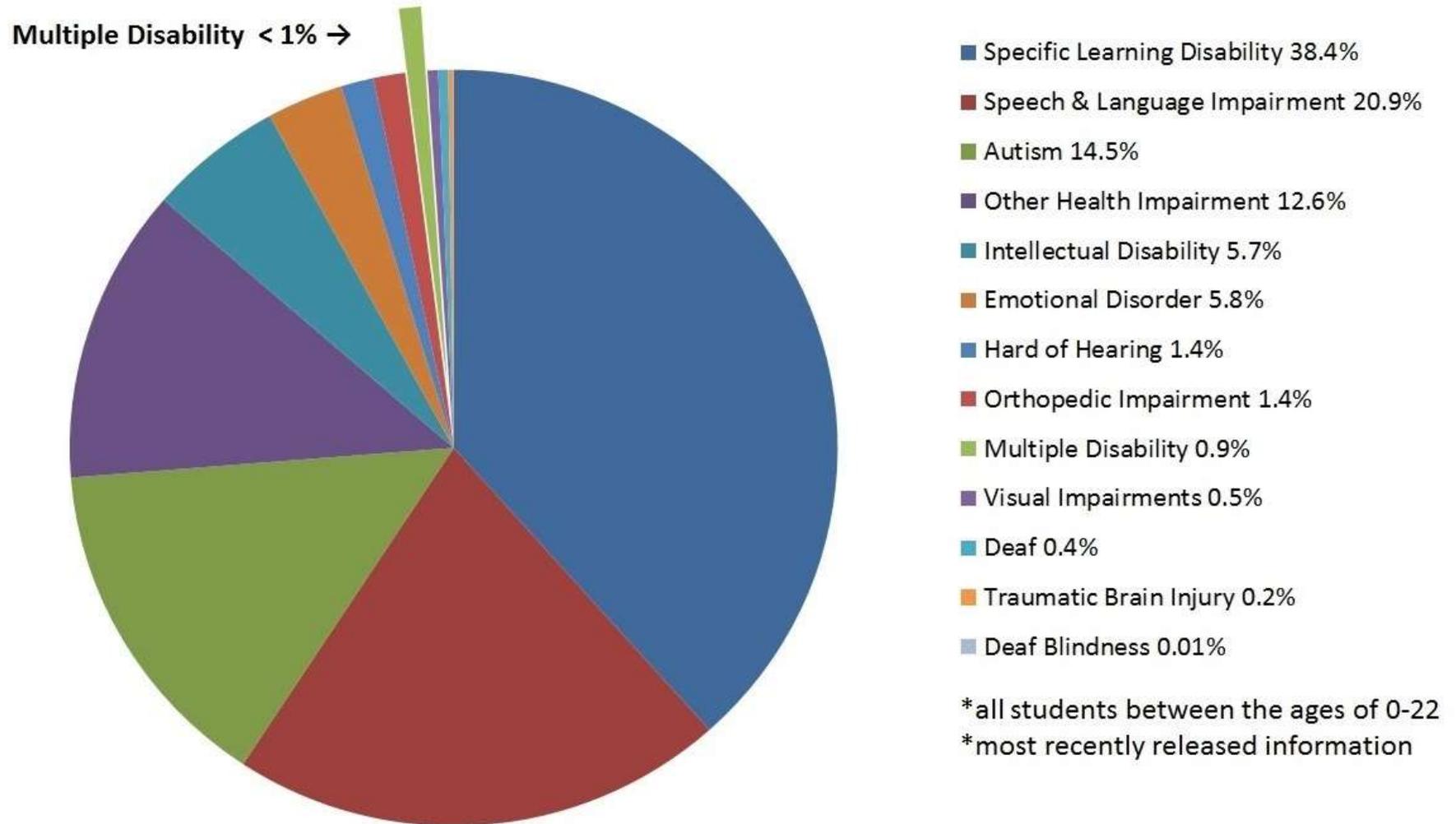
data obtained from <https://disabilitycompendium.org/compendium/2017-annual-disability-statistics-compendium?page=14>



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# 2017-18 CA Special Ed Population by Eligibility



data obtained from <https://data1.cde.ca.gov/dataquest/SpecEd/StateRpts/EnrGrdeDis.asp?cChoice=EnrGrdDis1&cLevel=State&cYear=2017-18&ReptCycle=December>



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# Common Challenges

- Truly understanding a child's unique educational, functional, behavioral, and emotional needs, and appropriately addressing the continuum of that student's needs utilizing comprehensive supports and services.
- Finding an appropriate balance between instruction in functional skills and academics while teaching/providing basic custodial care...Question of [g]oals...  
*“For many of these students, the post-school future holds day residential programs, nursing facilities or group homes, not college or jobs. The concepts of educational reform and standardized assessment have little meaning for them; they are among the most costly to educate and the least understood.”*
- Setting reasonable (now “ambitious”) expectations that can be reasonably met within a year.
- Occasionally balancing a parent's grieving process with appropriate expectations through the IEP process.
- Avoiding the trap of “warehousing” students or placing students in one-size fits all “programs” without individualizing placement.
- Complying with the goal (mandate?) of “inclusion”  
*“Because they need intensive interventions, students...do not fit neatly into the paradigm for special education that has prevailed in the United States for more than a decade: inclusion.*

\*“A Struggle to Educate the Severely Disabled” – Sharon Otterman, New York Times (June 19, 2010)



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# Noteworthy Historical Cases

## ***Poolaw v. Bishop* (23 IDELR 406 (9<sup>th</sup> Cir. 1995))**

School district appropriately placed a 12-year old profoundly deaf student who had moved into the district in a state residential facility for the deaf and blind rather than a regular classroom with supplemental aids and services because records of his educational experience documented the failure of past efforts to mainstream the student and conclusively showed the futility of another effort to do so.

## ***D.F. v. Western School Corporation* (23 IDELR 1121 (S.D. Ind. 1996) )**

IDEA does not require that a student with severe disabilities be placed in general education and then fail in that setting before removal.

## ***Student v. Somerset County Board of Education* (24 IDELR 743 (D. Md. 1996))**

Student need not be placed in a regular education classroom when student's prior mainstreaming experiences in nonacademic activities demonstrate the necessity for a more restrictive setting.



# What has changed?



# Common Core

Promoting a culture of high expectations **for all students** is a fundamental goal of the Common Core State Standards. While the Common Core State Standards do not define a full range of supports for students with disabilities, **the CCSS do clearly define that all students must have an opportunity to access the knowledge and skills needed to succeed in college and careers.** The CCSS establish the base for high expectations for all students with districts, schools, and teachers providing the support students need to reach those expectations.

**The Common Core State Standards are the standards for all students, regardless of identified disability, from mild-to-moderate and moderate-to-severe.** Meeting the needs of all learners while addressing the rigor and challenges of CCSS requires the members of the Individualized Education Program Team to thoughtfully analyze the tasks required of each standard and provide adaptations and support for each student. The CCSS will also be referenced in the design of IEP academic, behavioral, communication, transition, social/emotional and functional goals, thus providing the foundation for ALL students to become college, career, and community ready.

**Meeting the needs of students with disabilities in successfully accessing and meeting the expectations of the CCSS will ensure that students are equipped to think critically, contribute thoughtfully to academic discussions, and be engaged in their own learning and future goals.**

<https://blogs.egusd.net/ccss/educators/special-education/>



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# California Alternate Assessment (CAA)

- The California Alternate Assessments (CAAs) are part of the California Assessment of Student Performance and Progress (CAASPP) System.
  - **Intended for students with the most significant cognitive disabilities**
  - **A student with a significant cognitive disability** is one whose school records indicate a disability or multiple disabilities that significantly impact intellectual functioning and adaptive behavior. Adaptive behavior is defined as actions essential for an individual to live independently and to function safely in daily life. *Having a significant cognitive disability is not determined by an IQ test score; rather, a holistic understanding of the student is required.*
  - IEP teams should be careful to consider...
    - Conceptual skills—language and literacy; money, time, and number concepts; and self-direction.
    - Social skills—interpersonal skills, social responsibility, self-esteem, gullibility, naïveté (i.e., wariness), social problem solving, and the ability to follow rules/obey laws and to avoid being victimized.
    - Practical skills—activities of daily living (personal care), occupational skills, healthcare, travel/transportation, schedules/routines, safety, use of money, use of the telephone.



# Andrew F. v. Douglas County School District RE-1, 137 S. Ct. 988 (March 22, 2017)

- The long standing standard in the *Rowley* case of “some educational benefit” has now been clarified by the United States Supreme Court to obligate school districts to develop individualized educational programs that are **“appropriate in light of the child’s circumstances.”**

Additionally, the Court has stated that educational programs for children with disabilities must be **“appropriately ambitious,”** comparing the standards that typically developing children face when advancing from grade to grade.



# FAPE Analysis in the Aftermath of *Endrew F*

- To meet its substantive obligation under the IDEA, a school must offer an IEP reasonably calculated to enable a child to make progress appropriate in light of the child's circumstances.
- *Endrew* reaffirmed the United States Supreme Court in *Rowley*, noting “the benefits obtainable by children at one end of the spectrum will differ dramatically from those obtainable by children at the other end.”
- “The IEP must aim to enable the child to make progress. After all, the essential function of an IEP is to set out a plan for pursuing academic and functional advancement.”
- Any review of an IEP must appreciate that the question is whether the IEP is reasonable, not whether the court regards it as ideal.



# FAPE Analysis in the Aftermath of Andrew F

- “Rowley had no need to provide concrete guidance with respect to a child who is not fully integrated in the regular classroom and not able to achieve on grade level. That case concerned a young girl who was progressing smoothly through the regular curriculum. If that is not a reasonable prospect for a child, his IEP need not aim for grade-level advancement. **But his educational program must be appropriately ambitious in light of his circumstances, just as advancement from grade to grade is appropriately ambitious for most children in the regular classroom. The goals may differ, but every child should have the change to meet challenging objectives.”**
  - *Andrew F., at p. 1000*



# FAPE Analysis in the Aftermath of Endrew F

- For children receiving instruction in the regular classroom, The IDEA's guarantee of a substantively adequate program of education to all eligible children would generally require an IEP 'reasonably calculated to enable the child to achieve passing marks and advance from grade to grade.' **For a case in which the student cannot be reasonably expected to “progress smoothly through the regular curriculum,” the child’s educational program must be “appropriately ambitious in light of the child’s circumstances.**
- The adequacy of a given IEP turns on the unique circumstances of the child for whom it was created.
  - *Parents v. Sequoia Union High School District, OAH Case No. 2017050461, quoting Endrew F*



# FAPE Analysis in the Aftermath of *Endrew F*

- In so clarifying “some educational benefit,” the Court stated that it would not attempt to elaborate on what appropriate progress would look like from case to case. “It is in the nature of the Act and the standard we adopt to resist such an effort: The adequacy of a given IEP turns on the unique circumstances of the child for whom it was created.” (580 U.S. 137 S.Ct. at p. 1001).
- *Endrew F* does not create a new legal standard for what constitutes a FAPE, but is a clarification of *Rowley*. (K.M. v. Tehachapi Unified School Dist. (E.D. Cal. Apr. 5, 2017, 1:15-cv-001835 LJO JLT) 2017 WL 1348807, \*\*16-18.) See also *Menifee Union School District v. Parent on Behalf of Student*, OAH Case No. 2018041172



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# FAPE Analysis in the Aftermath of Andrew F

- **What should we be doing now?**

- Collect data to determine a child's true circumstances in order to develop appropriate programming.
  - Have a complete understanding of the child's anticipated progress based on his or her disability when developing IEP Goals.
  - Make the data the focus of the decision-making.
  - Respect parents and consider their input.
  - Make sure the child's educational program is sound.





# Least Restrictive Environment (LRE)

Special education classes, separate schooling, or other removal of individuals with exceptional needs from the regular educational environment is permitted only if the nature or severity of the disability is such that education in the regular classes with the use of supplementary aids and services cannot be achieved satisfactorily.

**(Education Code § 56040.1(b))**

Four factors are instructive in determining whether a Student receives an appropriate placement in the least restrictive environment:

1. **The educational benefits to Student**
2. **The non-academic benefits to Student**
3. **The effect student has on the teacher and other pupils in the regular class; and**
4. **The costs of educating the child in a regular classroom with appropriate services, as compared to the cost of educating the child in the district's proposed setting.**

***Sacramento City School Dist. v. Rachel H. (9th Cir. 1994) 14 F.3d 1398, 1403)***

A placement must foster maximum interaction between disabled pupils and their nondisabled peers in a manner that is appropriate to the needs of both.



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# How is OAH analyzing these issues?



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# Alhambra Unified School District v. Student

**OAH Case No. 2006030363**  
**ALJ - Stella L. Owens-Murrell (July 27, 2006)**

District-filed case seeking an order that the recommended placement at Lincoln Severely Handicapped Special Day Class (Lincoln SHSDC) operated by LACOE was appropriate.

Student presented with multiple disabilities including Global Severe Developmental Delays-Mental Retardation, Cerebral Palsy, Macrocephaly, Intractable Seizures, Cortical Visual Impairment, Hyperobia and Photophobia. Student was also legally blind.

Student asserted a program incorporating his inclusion in a general education was appropriate. He argued that the proposed placement in Lincoln SHSDC was calculated to segregate him from non-disabled students and was not adequate to meet his educational needs.

Student advocated for remaining in his current placement (SDC with inclusion into general education for art and music classes) with the provision of additional support services.



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# Alhambra Unified School District v. Student

## *District prevailed*

Judge applied Rachel H factors and determined student derived no educational benefit

“Because of Student’s extensive developmental delays and severe disability Student derived no educational (*academic*) benefit from his inclusion and mainstreaming in general education art and music classes as requested by Student’s mother.”

Evidence established that Student could not derive *non-academic* benefit from interaction with his non-disabled peers.

Student’s presence in the regular education classroom setting was disruptive to teacher and other students.  
(*Impact on others due to frequent outbursts in class and daily seizures*).



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# Sierra Unified School District v. Student

**OAH Case No. 2007080370**  
**ALJ – Eileen M. Cohn (January 8, 2008)**

District-filed case seeking an order that the offered placement to a 16-year old student in center-based site (Ramacher Education Complex) operated by Fresno County Office of Education was FAPE in LRE.

- District did not operate an SDC exclusively for severely disabled pupils at the high school level.
- Ramacher was a center-based site devoted almost exclusively to the education of severely disabled pupils.
  - No opportunities for mainstreaming pupils in regular education classes or for random interactions with regular education peers.

**Student Prevailed - ALJ determined District's offer of Ramacher was not an offer of FAPE in the least restrictive environment.**



# Sierra Unified School District v. Student

Student's diagnoses included cerebral palsy (CP), spastic quadriplegia, hydrocephalus, right scoliosis with pelvis rotated to the right, seizure disorder & visual impairment. Fed by G-Tube.

Primary eligibility for special education as OI; District determined Student also met statutory qualifications for eligibility under the categories of mental retardation (significantly below average intellectual functioning with concurrent deficits in adaptive behavior) and visual impairment.

Decision recognized Student was profoundly disabled and required intensive support for all his daily activities:

- Presented with unique medical needs that must be addressed for him to access his education.
- Judge found student to have “unique auditory needs” requiring general education placement.



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# Sierra Unified School District v. Student

Educational Benefits to Student *of the Ramacher Placement (Factor 1) was not a focus of the decision.*

ALJ concluded Ramacher:

- Provided little prospect for student to be joined by pupils his age;
- Pupils were between 18 and 22 in classes envisioned for Student;
- Judge agreed with student's conclusions that Ramacher could not provide a meaningful educational benefit to Student in light of his visual limitation and "unique auditory needs";
- Judge found Ramacher could not provide the daily interaction with regular education pupils that student needed.



# Sierra Unified School District v. Student

- Credibility of Student's versus District's witnesses.
- Testimony established that Student did not require behavioral intervention
  - Testimony was strong that student was not disruptive and other students benefitted from his presence in music class.
- Judge found Student's unique communication, language, visual and social needs and related IEP goals required that he be educated in an environment that was "verbal":
  - Student needed to be in a site-based SDC with daily opportunities for inclusion with the regular education population so that he can accommodate his unique needs and IEP goals.
  - Student received nonacademic social benefits from his participation in an inclusive regular education campus.
  - Regular education population was enriched by his presence.
  - District failed to show that costs of educating Student in a site-based SDC were substantial or outweighed other factors considered in determining whether Student should be transferred to a more restrictive placement.
  - Medical needs required that he be transported to school by bus drivers trained to directly intervene in the event he has a seizure.



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# Sierra Unified School District v. Student

## Takeaways:

- Know the child.
- Don't make decisions outside of the IEP process.
- Be careful of any action that could be perceived to be predetermination.
- Judge found the decision to place Student at Ramacher did not occur within an IEP team meeting and thus Parent's limited waiver of an IEP Team meeting did not cure District and Fresno SELPA's predetermination of Student's placement. (Determination that Fresno SELPA unilaterally determined Student's placement outside of the IEP process and apart from the IEP team).
- Be mindful of effect on teacher and children in academic and non-academic classes.

"...[A]s with all special education placements, it is presumed that exposure to typical peers "to the extent practicable" has educational and non-academic benefits to Student. It follows, that one consideration of the "extent" it is "practicable" to expose Student to typical peers, is his 'effect on the teacher and the children' in any regular class, not just academic classes."

**Query: Would this case be decided the same in 2019 under the required Endrew F analysis?**



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# Elk Grove USD v. Parent

OAH Case No. 2016110439  
ALJ – Andrea Miles (March 15, 2007)

## *District Prevailed*

District met its burden of proving that the offered IEP was *reasonably calculated to enable Student to make progress in light of his circumstances*. Implementation of the offered IEP would change Student's placement from a fifth grade general education classroom to a self-contained classroom; nevertheless, the change in placement is necessary because the severity of the Student's disabilities prevents him from accessing the general education curriculum. The evidence shows that the negative effects of having Student placed in general education far outweigh any potential positive effects and that the offered placement is the LRE for Student.

Important: A placement must foster maximum interaction between disabled pupils and their nondisabled peers *in a manner that is appropriate to the needs of both*.

GE Teacher credibly testified that Common Core standards are based heavily on critical thinking and problem solving. Fifth Grade Common Core math problems are language based and often require three to four steps of problem solving and are designed to encourage students to struggle to solve them.

- Student's inability to participate actively in the group problem solving prevented Student from accessing the curriculum.
- Other students were kind and patient with Student when working in groups. They attempted to help him by explaining the curriculum to him; however, the time that the other students spent trying to help Student with the curriculum caused them not to attend to their own work.



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# Poway Unified School District v. Student; Student v. Poway Unified School District

**OAH Case Nos. 2006070546 and 2006080043  
ALJ – Susan Ruff (March 15, 2007)**

Case involved 19 year old legally-conserved woman eligible for special education for many years under the category of mental retardation.

- Consolidated cases filed by District and Student.
- District sought an order finding that its offer of FAPE for 2006-2007 school year was appropriate.
- Student cross-filed claiming:
  - District denied Student a FAPE by failing to provide appropriately trained aides, using too many aides causing a lack of continuity in Student's program, and by failing to provide Student with required supplemental aids and services during the 2005-2006 school year.
  - Offer for 2006-2007 school year was not reasonably calculated to provide Student with educational benefit in reading and math, the high school offered was not the least restrictive environment, the peers at the high school were inappropriate models for student and the District inappropriately changed Student from diploma-track.



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# Poway Unified School District v. Student; Student v. Poway Unified School District

Student presented with a history of seizures dating to early childhood.

- Assessed (WISC-IV) to have FSIQ of 40
- Scored in lowest percentile in every category of WIAT
- Classroom work matched the test results from the WISC-IV and WIAT
  - Student could add “one” to another number and get the answer but was unable to perform other types of addition; could not perform subtraction without a calculator; could not recognize coins other than pennies; could not count money or make change and had trouble telling time; reading was at or below a third grade reading level.

## *District prevailed*

- Parent (unrepresented) failed to provide evidence (burden of proof) to support any of her allegations.
- District’s offer for 2006-2007 consisted of placement in the District’s “transition program” along with services and supplemental aids similar to those provided in her prior IEP.



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# Poway Unified School District v. Student; Student v. Poway Unified School District

## Takeaways:

- Be careful when drafting goals when Student transitioning past high-school age.
- Be wary of including specific methodology (anywhere) in IEPs:
  - Parent contended transition program was not reasonably calculated to provide student with educational benefit in the areas of reading and math. (SRA program being used with Student is not normally used in transition program and instructors are not trained to use that method of instruction).
  - “Although the SRA program is mentioned in the IEP meeting notes, it does not appear that the proposed IEP requires the District to use the SRA methodology in Student’s education at the transition program.”



# Poway Unified School District v. Student; Student v. Poway Unified School District

## Takeaways:

- “Access to typical peers” analysis can be different in adult transition programming:
  - Same aged peers no longer at Rancho Bernardo High School.
  - Student is a 19-year old adult, not a high school student.
  - Although there are occasionally 19-year old students on the RBHS campus, the vast majority of Student’s peers are not there.
  - Student’s participation in a job in the community will give her far more exposure to her typically developing adult peers that a special day class placement in a high school where the majority of children are at least two years below her age and all her instruction requires a one-to-one aide and modification of the curriculum.
  - Student has only three years left before she passes the maximum age for special education. The District has only three years to prepare Student to take her place in the community. The transition program is designed to do just that. The emphasis on the practical skills necessary for an adult to function in everyday society and on-the-job training gives Student her best opportunity for the greatest measure of independence possible.
  - Given Student’s age and her cognitive limitations, it is imperative that she receive instruction in the skills necessary for her to function in the real world.”



# Parents v. Anaheim City SD Anaheim City SD v. Parents

Consolidated OAH Case Nos. 2016090258; 2016050770  
ALJ – Marc Levine (February 23, 2017)

## Student Issues:

Student contended that District failed to offer an appropriate placement, which Student asserted was a NPS. Student also contended that District failed to offer Student a full-time licensed vocational nurse and a full-time one-to-one board-certified behavior analyst to meet Student's unique medical and behavior needs at school.

## **District Issues:**

District contended that its IEP offer constituted a FAPE in the LRE and sought an order permitting it to implement the IEP without parental consent.

*Neither Party Prevailed!*



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# Garvey SD v. Parents

**OAH Case No. 2016110339**

**ALJ – Marian H. Tully (March 23, 2017)**

Nine year old student who qualified for special education under primary eligibility of OI with a secondary eligibility category of ID. Disabilities included cognitive impairment and other impairments due to epilepsy, cerebral palsy, spastic quadriplegia and vision impairment that significantly affected all activities in her daily life.

- **Student presented with deficits in cognition, adaptive behavior, verbal and nonverbal communication, and social/emotional functioning.**
- **Student presented with poor muscle control, tone and coordination, exaggerated reflexes.**
- **Student also presented with blurred vision, intermittent outward, inward upward and uncoordinated eye movement and cortical visual impairment.**
- **Student was fed through a gastrostomy tube.**
- **Primary mode of communication was through eye gaze.**
- **Assessments found age equivalency in most areas to between zero to 12 months.**



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# Garvey SD v. Parents

OAH Case No. 2016110339  
ALJ – Marian H. Tully (March 23, 2017)

Student went to recess in her wheelchair with her aide twice a day. She smiled and laughed when she watched other children, but she did not engage with them.

- Father told District he “did not care about any issues other than whether Student was with children who talked.”
- Father informed District he would revoke consent unless District put Student in a general education class with children who were able to speak.

District’s IEP offered placement and related services which would result in Student spending 91 percent of her day outside of the general education environment. Access to typical peers equated to approximately 9% of day (primarily during recess).

*District Prevailed. ALJ ruled that the undisputed evidence demonstrated that Student required a more restrictive environment and more services than could be accomplished satisfactorily in a general education environment. In this case, Student would receive no educational benefit from full-time placement in a regular classroom. She required a highly modified functional curriculum delivered by a special education teacher with the assistance of a full-time one-to-one special circumstances aide to obtain educational benefit from her program. Her participation in recess with typical peers was the maximum extent appropriate given her level of social interaction and communication skills. Student's unique needs required the more restrictive environment of a moderate/severe special day class with individualized related services.*



# Garvey SD v. Parents

## Takeaways:

- Goals: “The IDEA does not require a particular number of goals nor does it require goals for every particular manifestation of the Student’s disability.”
  - But be careful with this!



# Parent v. Menifee Union School District

OAH Case No. 2017060872

ALJ – Rommel Cruz (September 19, 2017)

Case involved 8 year old female student eligible for special education under the categories of multiple disabilities and orthopedic impairment.

Student presented with severe orthopedic impairment, other health impairment, speech and language impairment, and intellectual disabilities.

She presented with deficits in the areas of self-help, toileting and feeding, communication, loco-motion and motoric functioning, and health and safety issues, all of which affected her involvement and participation in classroom activities. She was non-verbal and relied on an AAC eye gaze device to express herself and organize her language in a systematic way.

Student's immune system was compromised and providers were not to provide services if they were sick or exposed to others who were ill. Student received HHI.



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# Parent v. Menifee Union School District

*District substantially prevailed*

## Takeaways - watch out for these:

- Continuation of services when Parents refuse staff access to home.
- Appropriate use of Prior Written Notice when staff in disagreement with Parent requests.
- Facilitating sufficient Parental access to student records.
- Calculation of compensatory services.
  - “There is no obligation to provide a day-for-day compensation for time missed. Appropriate relief is designed to ensure that the student is appropriately educated within the meaning of the IDEA.”
    - *But while cited, do judges follow this?*



# Parents v. Fountain Valley USD Fountain Valley USD v. Parents

Consolidated OAH Case Nos. 2017110243; 2017120743  
ALJ – Laurie Gorsline (May 25, 2018)

## Student Issues:

1. District failed to develop and offer appropriate goals in all areas of need; specifically, academics, social interaction, communication, behavior and adaptive skills.

*Student prevailed as to appropriateness of 1 out of 18 goals, but while a procedural violation, did not rise to the level of substantively denying the student a FAPE*

2. District denied Student FAPE by failing to include autism as basis for eligibility.

*District prevailed*

3. District denied Student a FAPE by failing to offer him an appropriate placement.

*Student prevailed*

4. District denied Student a FAPE by failing to offer student appropriate related services; specifically:

- Social Skills Intervention – *District prevailed*
- Behavior Services – *District prevailed*
- Speech and Language Therapy – *Student prevailed*



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# Parents v. Fountain Valley USD Fountain Valley USD v. Parents

## District Issue:

Did District offer Student a FAPE in the June 16, 2017 IEP, as amended on October 13, 2017, such that District may implement it without parental consent?

*Student prevailed – District not allowed to implement IEP*

*Compensatory reimbursement and services awarded for denials of FAPE*

## Takeaways:

- Do not assume special day class is a “one-size fits all”.
- Eligibility category not “be-all-end-all” as long as totality of IEP meets Student’s FAPE needs.
- Be prepared and able to confidently explain your programs, services, and supports (and do so, both at meetings and in due process proceedings).
- Be careful to not carry over old goals; update and individualize all goals for new annual period and be able to explain yourselves as to how and why goals are updated the way they are.



# Wrap-Up

- Every child is different, but every child is capable of learning as their circumstances permit.
- Make sure your teams have contemplated all of a student's needs stemming from his/her disability.
- Consider parental input carefully, but be sure to offer FAPE
  - An IEP
  - That is Reasonably Calculated
  - To Enable the Child
  - To Make Progress
  - Appropriate
  - In Light of the Child's Circumstances
- Be careful to appropriately document services if your district participates in Med-Cal Reimbursement Program.



A photograph of a classroom with rows of desks and chairs, overlaid with a semi-transparent blue filter. The text is centered on this background.

# Thank You For Attending

Enjoy the Rest of the Conference!



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