

IEP DOCUMENT REVIEW MEMORANDUM

STUDENT PROFILE

Jordan is a 16-year-old tenth-grade student eligible under Specific Learning Disability (SLD) in reading fluency and reading comprehension, with a secondary eligibility of Other Health Impairment (OHI) based on ADHD, combined presentation. The IEP under review carries a meeting date of 03/05/2026 with effective dates 03/05/2026 through 03/04/2027, drafted for the Meridian Valley Unified School District; the governing circuit and state are not determinable from the four corners of the document. The priority document-level concerns for professional review include: a documented safety-relevant behavior (three unauthorized classroom exits) with no FBA, BIP, or safety mechanism despite a "Yes" finding on behavior impeding learning; a parent-submitted private evaluation recommending intensive structured literacy that appears refused without documented rationale in the Prior Written Notice; internal inconsistencies between progress reporting and the actual goals in the IEP; and several open-ended accommodations and services with implementation-clarity gaps.

EXECUTIVE SUMMARY

- **[CRITICAL]** The document identifies a documented phonological deficit and a private-evaluation recommendation for intensive structured literacy (5x/week, 45 min) but the offered reading service is 3x/week for 30 minutes in a group with no documented rationale for the gap; consider requesting a PWN and reevaluation/additional assessment to assess the reading-service adequacy under Endrew F.
- **[CRITICAL]** The Special Factors table marks behavior as impeding learning ("Yes") and documents three unauthorized classroom exits tied to reading demands, yet no FBA, BIP, or safety/crisis mechanism appears; consider whether behavioral assessment and a structured response should be requested.
- **[SIGNIFICANT]** The Written Expression goal requires a five-paragraph essay with "correct spelling" at 90% from a one-paragraph baseline, which presents a measurability/attainability concern; consider requesting a goal revision anchored to documented data.
- **[SIGNIFICANT]** The 01/2026 progress note reports growth on "decoding and self-advocacy goals," but the team itself notes the 2025 IEP contained no such goals, presenting a document-integrity and progress-reporting reliability concern under 34 C.F.R. § 300.320(a)(3).
- **[PROCEDURAL]** Multiple accommodations and services use open-ended triggers ("as appropriate," "when available," "as staff availability permits," "as needed"), creating implementation-verification concerns to clarify with the team.

SECTION 1 — PLAAFP ANALYSIS

The Present Levels section is generally data-referenced and specific across reading, written expression, mathematics, executive functioning, and social/emotional/behavioral domains.

Reading present levels are well-documented and data-anchored. The reading narrative recites a fall 2025 oral reading fluency score of 96 WCPM against an approximate 150 WCPM benchmark, and comprehension probe data showing 50% accuracy reading independently versus 78% read aloud. This satisfies the specificity contemplated by 34 C.F.R. § 300.320(a)(1), which requires a statement of present levels including how the disability affects involvement in the general curriculum. This is a documentation strength, not a defect.

The executive-functioning and homework-completion needs are documented but their connection to a goal or service warrants review. The PLAAFP and the Prior-Year Progress table document 14 missing or late assignments in the second quarter and inconsistent planner use. Under 34 C.F.R. § 300.320(a)(1), present levels must connect to the goals and services that follow. The Self-Advocacy goal (Goal 5) partially addresses help-seeking, but no goal or service specifically targets organization/assignment tracking, which the document repeatedly identifies as a functional need. An advocate may wish to assess whether the organizational/executive-functioning need is addressed anywhere in the IEP or whether it is a documented need without an identifiable response (see Section 3).

The behavioral/reading-avoidance pattern is documented in present levels. The social/emotional narrative documents three classroom exits connected to "frustration and task avoidance during reading demands" and states "No formal behavior plan is currently in place." This is relevant to the FBA/BIP and safety analyses in Sections 5 and 6.

SECTION 2 — EVALUATION DATA AND FAPE NEXUS

Applying *Endrew F. v. Douglas County School District*, 580 U.S. 386 (2017), the IEP must be reasonably calculated to enable progress appropriate in light of the child's circumstances.

The WISC-V working memory and processing speed findings appear underexplored in the IEP. The evaluation table recites WISC-V Working Memory SS 82 and Processing Speed SS 79, both meaningfully below the FSIQ of 103. The IDEA requires the team to evaluate in all areas of suspected disability and to reflect evaluation data in the program under 34 C.F.R. § 300.304(b) and § 300.320(a). These processing weaknesses plausibly relate to the documented executive-functioning and stamina concerns, but the IEP does not expressly link them to any goal or accommodation. An advocate may wish to ask how the working memory and processing speed data informed the goals and accommodations.

EVALUATION ADEQUACY FINDING — Private neuropsychological evaluation phonological finding and structured-literacy recommendation. The document shows a parent-submitted 09/2025 private neuropsychological evaluation identifying a significant phonological processing deficit and recommending an Orton-Gillingham-based structured literacy intervention, 5 times per week for 45 minutes, by a trained reading specialist. Under 34 C.F.R. § 300.304, evaluation must occur in all areas of suspected disability, and under 34 C.F.R. § 300.502(c) the district must consider a parent-obtained evaluation. The IEP offers Specialized Reading Instruction 3 times per week for 30 minutes in a group of 3-5 focused on "strategies, vocabulary, and fluency practice," which does not on its face reflect a phonological/decoding structured-literacy approach and provides substantially less intensity. The advocacy implication is that the mechanism to address the identified phonological deficit may be absent or under-specified; because the concern here is whether a suspected area (decoding/phonological skill) is adequately assessed and served, the applicable district mechanism to consider is a reevaluation or additional assessment under 34 C.F.R. § 300.303 and § 300.305. An IEE at public expense under § 300.502 would arise only if the parent disagreed with a district-obtained evaluation, which the document does not establish; here the parent obtained the private evaluation independently.

The comprehension and fluency goals appear reasonably calculated relative to the reading data, but the reading-service intensity is the open question. Whether the offered program is reasonably calculated to enable appropriate progress under *Endrew F.* cannot be resolved from the document alone; it depends on the complete record. The gap between the identified phonological need and the offered strategies/vocabulary/fluency service is the central FAPE-nexus item for professional review.

SECTION 3 — GOALS ANALYSIS

Each goal includes a baseline and short-term objectives. The stated measurement methods for all goals are drawn from the single narrative preface (curriculum-based assessments, teacher-made assessments, work samples, observation) plus a per-goal method column; because the form uses a narrative method column rather than checkboxes, the primary mismatch check compares each goal's method column against the goal text.

Goal 1 — Reading Fluency. Measurable: 96 WCPM baseline to 115 WCPM at 95% accuracy on 3 consecutive probes. The baseline in the goal matches the PLAAFP figure (96 WCPM). Note a potential internal target inconsistency: the annual goal targets 115 WCPM on "instructional-level passages," while the baseline was measured on a grade-10 passage; the June objective (105 WCPM) and November objective (110 WCPM) are internally consistent with the 115 endpoint. Progress reporting is specified (quarterly). This goal appears adequate; no rewrite offered.

Goal 2 — Reading Comprehension. Measurable: 50% independent baseline to 80% accuracy on literal and inferential questions, 4 of 5 trials. Baseline matches PLAAFP. The goal text does not specify whether the target 80% is on independently-read text or read-aloud text, which matters given the 50%/78% split in the baseline. This is a potential measurability ambiguity. Progress reporting specified. An advocate may wish to clarify the reading condition for the target.

Suggested rewrite: "By 03/2027, when given a grade-level passage read independently and 10 comprehension questions, Jordan will answer literal and inferential questions with [80]% accuracy on 4 of 5 trials." (Condition clarified; target drawn from the document's stated figure, to be confirmed by the team.)

Goal 3 — Written Expression. This goal presents measurability and attainability concerns. The baseline is "writes one organized paragraph with a graphic organizer and model." The annual goal is "write a five-paragraph essay with correct spelling, scoring 90% on a teacher-made rubric on 4 of 5 trials." Under 34 C.F.R. § 300.320(a)(2), goals must be measurable and designed to meet needs resulting from the disability. Two issues: (a) "correct spelling" is undefined and, given the PLAAFP documents inconsistent spelling as a disability-related weakness, a "correct spelling" criterion at 90% may be neither operationally defined nor calibrated to the student's data; and (b) the jump from one paragraph to a five-paragraph essay in one year is a substantial leap that the short-term objectives partially scaffold (three-paragraph by June, five-paragraph by November) but do not reconcile with the "correct spelling / 90% rubric" endpoint. The rubric itself is undefined (which criteria, weighted how). This is a measurability gap because different scorers could apply "correct spelling" and an undefined rubric differently.

Suggested rewrite: "By 03/2027, given a graphic organizer, Jordan will write a [X]-paragraph essay scoring at least [3 of 4] on each identified criterion (organization, supporting detail, spelling) of a specified teacher rubric on 4 of 5 trials." (Rubric criteria and paragraph count must be set from the student's data by the team; placeholders reflect that the document supplies no defined rubric or defensible paragraph target.)

Goal 4 — Mathematics Word Problems. Note a baseline inconsistency worth flagging. The goal's baseline states "65% accuracy when reading independently," but the PLAAFP states "No math-specific skill deficit was identified by the team" and describes math as at or near grade level. Under 34 C.F.R. § 300.320(a)(2), conflicting baseline framing undermines measurability. The goal is otherwise measurable (65% to 80%, 4 of 5 trials). The larger question is that the difficulty described is a reading-access issue (reading the problem independently), not a math-skill deficit; whether a standalone math goal is the right mechanism versus a read-aloud accommodation is a question for the team. Progress reporting specified.

Suggested rewrite: "By 03/2027, when word problems are presented in [specified condition], Jordan will solve multi-step word problems with [80]% accuracy on 4 of 5 trials." (Condition to be specified by the team to reconcile the goal with the PLAAFP statement that no math-skill deficit exists.)

Goal 5 — Self-Advocacy. Measurable: request help/clarification/break in 4 of 5 observed opportunities, with objectives scaffolding checklist use then verbal/card requests. Baseline present. Progress reporting specified. This goal appears adequate; no rewrite offered.

Documented-need cross-check. The most significant documented need without a clearly identifiable response is organization/assignment-tracking (14 missing assignments, inconsistent planner use, "says he has no homework"). This need appears addressed only glancingly through "chunking" accommodations and the counselor check-in, not through a goal or a dedicated service targeting organization. Whether this constitutes a FAPE concern under 34 C.F.R. § 300.101 depends on the complete record and whether the accommodations adequately address it. The reviewed pages show multiple identified need areas (reading, written expression, executive functioning/organization, behavior/avoidance) and five annual goals; an advocate may wish to confirm whether the organization need is adequately addressed by the existing supports or requires its own goal or service.

SECTION 4 — ACCESS AND ACCOMMODATION ANALYSIS

A. Documented access needs largely have corresponding supports. Reading access (read-aloud, audiobooks/digital text), writing access (graphic organizer, speech-to-text referenced in PLAAFP), and executive-functioning support (chunking, check-ins) generally map to documented needs.

ACCESS / ACCOMMODATION CONCERN — Speech-to-text/word prediction referenced in PLAAFP but absent from the accommodations table. The written-expression PLAAFP states Jordan benefits from "word prediction" and "the option to use speech-to-text for longer writing assignments," and the parent requested AT for audiobooks, text-to-speech, and organization. The accommodations table lists audiobooks/digital text but does not list speech-to-text or word prediction as an available support. This may matter because a documented access support does not appear to be offered, and the Special Factors table marks assistive technology "No." An advocate may wish to ask whether speech-to-text/word prediction is available to Jordan and why it was not included (see Section 6 AT finding).

B. Several accommodations are open-ended, creating implementation-verification concerns. Multiple entries use open-ended triggers: read-aloud "as appropriate and where permitted"; audiobooks/digital text "when materials are available"; graphic organizer "when requested or when assigned by teacher"; teacher check-ins "as staff availability permits"; reduced copying "when available"; "Breaks as needed." Open-ended frequency or availability triggers make it difficult to verify on any given occasion whether the accommodation was required and delivered. This is an implementation-clarity concern, not a conclusion that the provisions are unenforceable. An advocate may wish to seek specific, observable criteria defining when each applies (for example, which assignments trigger digital text, and how "staff availability" is not permitted to defeat a required check-in).

C. Coverage across environments. The accommodation set generally references general education classes and assessments. An advocate may wish to confirm coverage extends to electives/digital-media courses Jordan intends to pursue and to nonacademic settings where reading demands arise.

D. Health/behavioral-access/safety/communication supports. Behavioral-access and safety supports are notably thin given the documented classroom-exit behavior; this is addressed in Sections 5 and 6. No separately labeled Section 504 concern arises from the four corners of the document beyond the AT question above.

SECTION 5 — SERVICES AND LRE ANALYSIS

Service parameters. The services table specifies frequency, duration, provider, and location for each service, which satisfies the parameter requirements of 34 C.F.R. § 300.320(a)(4) on their face:

- Specialized Reading Instruction: 3x/week, 30 min, SpEd teacher, resource room.
- Specialized Academic Support: daily, 15 min, SpEd teacher, gen ed (note the qualifier "as schedule permits").
- Specialized Math Support: daily, 15 min, SpEd teacher, gen ed.
- Speech-Language Therapy: 2x/month, 30 min, SLP, therapy room.
- Counselor Check-In: 1x/month, 20 min, counselor.

Open-ended service qualifiers. "Support during English or history as schedule permits" and "Missed sessions will be rescheduled when practicable" introduce open-ended delivery conditions. Under 34 C.F.R. § 300.320(a)(7) and § 300.323(c), services should be stated with enough specificity to verify delivery. An advocate may wish to seek clarification on what "as schedule permits" and "when practicable" mean in verifiable terms.

Reading-service intensity relative to the identified need. As discussed in Section 2, the offered 3x/week, 30-min group reading service does not on its face match the documented phonological deficit or the private evaluation's structured-literacy recommendation. This is the central services question for professional review under *Andrew F.* and § 300.320(a)(4)'s peer-reviewed-research provision (to the extent practicable); the private evaluation specifically recommended a research-based Orton-Gillingham approach, and the IEP does not identify the methodology of its reading service.

RELATED SERVICES CONCERN — Counseling/psychological services relative to documented frustration and avoidance behavior. The PLAAFP documents escalating frustration, task avoidance, and three classroom exits, and the counseling service offered is a monthly 20-minute "general check-in regarding school stress and planning." Under 34 C.F.R. § 300.34 and § 300.320(a)(4), related services must be sufficient to meet documented needs. An advocate may wish to assess whether a monthly general check-in adequately addresses the documented behavioral/emotional pattern, or whether the avoidance behavior warrants a more targeted response (see Section 6 FBA/safety findings).

Goal-to-service cross-check under § 300.323(c) and § 300.320(a)(4). The Self-Advocacy goal (Goal 5) has present levels and a measurable goal but no clearly matching service-table entry dedicated to it; it may be intended to fold into the counselor check-in or specialized academic support, but this is not stated. An advocate may wish to confirm which service delivers instruction toward the self-advocacy goal.

LRE analysis. The LRE statement recites approximately 78% time in general education and states Jordan will be removed for specialized reading and speech-language therapy. It provides a placement-options table with rationale. The narrative frames the analysis substantially as a *justification* for the selected placement ("Selected because...", "Rejected because...") rather than an *explanation* of the extent to which Jordan will not participate with nondisabled peers. Under 34 C.F.R. § 300.320(a)(4)-(5) and § 300.114, the IEP must affirmatively explain the extent, if any, to which the student will not participate in regular academic instruction and in nonacademic/extracurricular settings under § 300.117. The document explains removal for two services but does not address nonacademic or extracurricular participation. Because the governing LRE test is circuit-specific and the jurisdiction is not determinable from the document, no circuit standard is applied as controlling. This is a missing-element concern (nonacademic/extracurricular non-participation), distinct from the adequacy of the placement decision itself. An advocate may wish to ask that the LRE explanation address nonacademic and extracurricular settings.

SECTION 6 — PROCEDURAL COMPLIANCE ANALYSIS

Team composition — general education teacher present; LEA and SLP partial attendance. A general education teacher (R. Mbeki) is documented as present, satisfying 34 C.F.R. § 300.321(a)(2) given general education participation. The LEA Representative (M. Calder) is noted "Present for part of meeting" and the SLP "Excused from part of meeting." Under 34 C.F.R. § 300.321(e), excusal of a required member requires written parent and district agreement (and, where the member's area is discussed, written input). The document does not show the written excusal agreement for these partial attendances. An advocate may wish to verify whether written excusal consent exists for any period a required member was absent.

Reevaluation currency — within the triennial window. The most recent reevaluation is 01/22/2023 and the IEP meeting date is 03/05/2026, an interval of about three years and six weeks. Under 34 C.F.R. § 300.303(b)(2), reevaluation must occur at least once every three years unless the parent and district agree it is unnecessary. On these dates the triennial appears to have come due at or just before this meeting. The document states the team "reviewed existing data and determined that the available information was sufficient" and proposed no new evaluation, which is a permissible existing-data review under § 300.305(d) if the parent agreed no additional data were needed. An advocate may wish to verify whether a triennial reevaluation was formally conducted or waived by written agreement, given the private evaluation and the identified phonological need that existing district reading data did not fully assess.

Assistive technology consideration. The Special Factors table marks AT "No" while acknowledging discussion of audiobooks/digital text and the parent's explicit AT request. Under 34 C.F.R. § 300.324(a)(2)(v), the team must consider whether the child requires AT devices and services. The record shows consideration but a "No" determination despite a documented request and documented benefit from text-to-speech and word prediction. An advocate may wish to ask the basis for the "No" AT determination and whether an AT evaluation should be requested (via reevaluation/additional assessment under § 300.303/§ 300.305).

FBA/BIP and safety-relevant behavior. The Special Factors table marks behavior as impeding learning ("Yes"), documents three unauthorized classroom exits, and states no FBA was completed and no BIP is attached. Under 34 C.F.R. § 300.324(a)(2)(i), when behavior impedes learning the team must *consider* positive behavioral interventions and supports; the document shows consideration (check-ins, breaks, chunking). That provision does not, standing alone, mandate an FBA or BIP. However, the combination of an affirmative "Yes" behavior finding, documented elopement from class, and no formal frequency/duration/antecedent data is a gap for the advocate to assess.

SAFETY PLANNING FINDING — Unauthorized classroom exits with no safety or crisis mechanism. The document shows three incidents in which Jordan "left the classroom without permission" during or before reading tasks, returning within minutes. No safety plan, crisis protocol, or supplementary aid addressing elopement appears. Under 34 C.F.R. § 300.324(a)(2)(i), the team must consider PBIS where behavior impedes learning, and the safety dimension of leaving the classroom makes the adequacy of the current informal response (breaks, encouragement to return) more important to assess. The existing supports depend substantially on Jordan self-regulating and returning on his own; an advocate may wish to assess whether structured, adult-initiated antecedent supports and a data-collection framework (FBA) should be requested, and whether the frustration/avoidance pattern warrants a BIP.

ESY. The team marked ESY not required and states "No separate regression or recoupment data were collected." Consistent with the narrow framing appropriate here, the document does not state the individualized basis for the ESY determination beyond a review of progress reports and teacher input. An advocate may wish to ask what individualized information supported the ESY decision. Absent regression/recoupment or emerging-skill evidence in the record, this is not placed among the top priority issues.

Progress-reporting reliability / document integrity. The 01/2026 progress note states Jordan "has shown particular growth on decoding and self-advocacy goals," but the Prior-Year Progress table states the current team "did not locate separate decoding or self-advocacy annual goals in the 2025 IEP." Under 34 C.F.R. § 300.320(a)(3), progress must be reported on the IEP's actual goals. Reporting growth on goals that apparently did not exist is a document-integrity and progress-reporting reliability concern. An advocate may wish to ask which goals the progress note actually tracked and whether prior-year progress data are reliable.

State/district assessment participation. Jordan participates in standard assessments with accommodations, which does not trigger the alternate-assessment justification requirement of 34 C.F.R. § 300.160(b). For the district reading benchmark, "alternate administration may be used when appropriate" is an open-ended trigger worth clarifying, but no alternate-assessment justification defect arises because Jordan is not exempted from the regular assessment.

Signatures. The signature and consent page appears unsigned in the reviewed copy, and no parent consent box is checked. This is a document-completeness item to verify against the executed original.

SECTION 7 — MEANINGFUL PARENT PARTICIPATION

A. Participation documentation. The parent (L. Fournier) is documented as present, and substantial parent input is recorded, including the request for more intensive reading support, the submission of the private evaluation, and the AT request. Under 34 C.F.R. § 300.322, this reflects documented participation.

MEANINGFUL PARTICIPATION FINDING — Parent-proposed intensive reading and AT support recorded but adopted or refused without documented rationale. The document shows the parent requested structured literacy (via the private evaluation) and AT support. The PWN "Other options considered" lists "increasing reading support" and "adding additional organization supports" as considered and states only "The team adopted the program described in this IEP," with "No other written reasons are provided" for rejecting alternatives. Under 34 C.F.R. § 300.322 and § 300.503(b), parents must participate meaningfully and the PWN must explain why proposed options were rejected. The advocacy implication is that the record does not document why the more intensive reading and AT options the parent requested were not adopted, which bears both on meaningful participation and on PWN sufficiency.

B. Communication access. The document indicates English is the native language and no interpreter is needed; no communication-access concern is raised on the record.

C. Audio recording / processing accommodations. No parent request for recording or processing support appears; nothing to assess.

D. Notice and purpose integrity. No indication of an undisclosed purpose change or undisclosed attendees appears.

SECTION 8 — DECISION-MAKING PROCESS REVIEW

DECISION-PROCESS OBSERVATION — PWN states no written reasons for rejecting alternatives despite documented parent requests. The document shows the PWN lists several options "considered" (continuing current services, increasing reading support, adding organization supports, maintaining the current model) but states "No other written reasons are provided" for the rejections, and the adopted program largely maintains existing service levels despite a new private evaluation identifying a phonological deficit and recommending substantially more intensive intervention. Under 34 C.F.R. § 300.501(b), parents are entitled to meaningful participation in placement and service decisions, and § 300.503(b)(6) requires the PWN to state reasons for rejecting options. This warrants review of the full decision-making record: whether alternatives were genuinely evaluated with the parent, or whether the outcome reflected a continuation of the pre-existing program.

This is a prompt for record review, not a conclusion that predetermination occurred; predetermination is fact-intensive and cannot be established from the four corners of the document. *Deal v. Hamilton County Board of Education*, 392 F.3d 840 (6th Cir. 2004), is illustrative only and not treated as controlling because the jurisdiction is not determinable. An advocate may wish to review meeting notes, drafts, and the timing of the IEP's preparation, and to consider requesting a fuller PWN stating the reasons the more intensive reading and AT options were rejected.

SECTION 9 — SECONDARY TRANSITION ANALYSIS

Jordan is 16, so transition planning is required under 34 C.F.R. § 300.320(b).

A. Transition assessment. A student transition interest survey (02/2026) and informal interview are documented, addressing interests and preferences (science, history, graphic novels, video game design, animation, sports management). This addresses the preferences/interests requirement.

B. Postsecondary goals. Education/training and employment postsecondary goals are present and each is placed under the correct content area (education under education, employment under employment). They are, however, general ("attend college or a postsecondary training program"; "obtain part-time or full-time employment in an area related to his interests"). Under § 300.320(b)(1), postsecondary goals should be measurable. An advocate may wish to assess whether the goals are stated with enough specificity to measure attainment.

C. Independent living goal. Marked "Not applicable at this time." This is permissible under § 300.320(b) where the team determines an independent-living goal is not needed; no defect arises from its absence.

TRANSITION FINDING — Course of study not individualized to postsecondary goals. The document shows the course of study is "required courses for graduation and electives related to digital media when available." Under 34 C.F.R. § 300.320(b)(2), the course of study must be individualized to the student's postsecondary goals. The digital-media reference partially connects to Jordan's stated interest in video game design/animation, but the qualifier "when available" leaves it contingent, and the balance ("required courses for graduation") is generic. The advocacy implication is that the course of study may not adequately map to Jordan's specific college and career interests; an advocate may wish to ask for a course sequence tied to his stated postsecondary goals, particularly given Jordan's stated uncertainty about what classes he needs.

D. Transition services. Counselor meetings on graduation/college and college-fair attendance are identified and reasonably support the education goal, though they are thin relative to the employment goal.

F. Annual-goals alignment. The reading, writing, and self-advocacy goals plausibly support the college/postsecondary goal (reading and self-advocacy are directly relevant to postsecondary readiness), which supports § 300.320(b) alignment.

G. Student invitation. Jordan is documented as "Present for transition discussion," satisfying § 300.321(b)(1).

H. Agency invitation. The document identifies no outside-agency-funded transition service; agency invitation under § 300.321(b)(3) was therefore not required.

SECTION 10 — TRANSFER OF RIGHTS / AGE OF MAJORITY

The Transfer of Rights section states that Jordan and his parent were informed that rights under IDEA will transfer to Jordan when he reaches the age of majority, that notice was provided at this annual review, and that "Jordan will turn 18 on 04/12/2028."

Under 34 C.F.R. § 300.520, the transfer of rights occurs at the age of majority as defined by each state; the age of majority is therefore a state-specific matter and not a federal constant. It is commonly 18 but is defined differently in some states for special-education purposes, and any required advance-notice timeline is likewise state-defined. This memorandum does not resolve whether the recited age (18) is the governing age; that must be confirmed against the applicable state code and state education agency.

The advocacy implication: Jordan turns 18 on 04/12/2028, which falls *after* the 03/04/2027 end date of the current IEP term. If the state's age of majority is 18, the transfer will occur during a subsequent IEP term, and the beginning-at-least-one-year-before notice contemplated by § 300.320(c) would fall due in the IEP developed for the 2027-2028 year. An advocate may wish to confirm the governing age against the applicable state code and confirm the notice-timing requirement so the transfer-of-rights notice is provided at the correct annual review.

SECTION 11 — PRIORITY ISSUES AND OPTIONS FOR PROFESSIONAL ASSESSMENT

1. Reading-service intensity relative to the documented phonological deficit. The IEP offers a 3x/week, 30-min group reading service focused on strategies/vocabulary/fluency, while the private evaluation identifies a phonological deficit and recommends intensive structured literacy; the reading service's methodology is unstated. *34 C.F.R. § 300.320(a)(4); § 300.101; Endrew F.* **For the advocate's assessment:** consider requesting a fuller PWN and a reevaluation/additional district assessment of decoding/phonological skill under § 300.303/§ 300.305, and evaluate against the complete record whether the reading service is reasonably calculated to enable appropriate progress.

2. Safety-relevant elopement with no FBA, BIP, or safety mechanism despite a "Yes" behavior finding. The document marks behavior as impeding learning and documents three classroom exits with no formal data collection or structured response. *34 C.F.R. § 300.324(a)(2)(i).* **For the advocate's assessment:** consider whether to request an FBA and a structured, adult-initiated behavioral/safety response, and evaluate whether the current informal supports adequately address the avoidance and safety dimension.

3. Written Expression goal measurability and attainability. The goal requires a five-paragraph essay with undefined "correct spelling" at 90% on an undefined rubric, from a one-paragraph baseline. *34 C.F.R. § 300.320(a)(2).* **For the advocate's assessment:** consider requesting an IEP amendment to define the rubric criteria, operationalize the spelling standard, and calibrate the target to Jordan's data.

4. AT determination marked "No" despite documented benefit and an explicit parent request. Text-to-speech and word prediction appear in the PLAAFP as beneficial and were requested by the parent, but AT is marked "No" and speech-to-text/word prediction is absent from the accommodations table. *34 C.F.R. § 300.324(a)(2)(v).* **For the advocate's assessment:** consider asking the basis for the "No" AT determination and whether an AT evaluation should be requested via reevaluation/additional assessment.

5. PWN and decision-making sufficiency regarding rejected parent-requested options. The PWN states "No other written reasons are provided" for rejecting increased reading support and organization supports the parent sought. *34 C.F.R. § 300.503(b)(6); § 300.501(b); § 300.322.* **For the advocate's assessment:** consider requesting a corrected PWN stating the reasons alternatives were rejected, and review the full record for indicators bearing on the decision-making process; formal dispute-resolution mechanisms (mediation, state complaint, due process) exist to evaluate against the complete record if it supports them.

6. Progress-reporting reliability / document-integrity conflict. The 01/2026 progress note reports growth on decoding and self-advocacy goals the team itself states did not exist in the 2025 IEP. *34 C.F.R. § 300.320(a)(3).* **For the advocate's assessment:** consider asking which goals prior-year progress actually tracked and whether prior progress data are reliable for planning.

7. LRE explanation omits nonacademic/extracurricular non-participation. The LRE narrative justifies the placement but does not explain the extent of non-participation in nonacademic and extracurricular settings. *34 C.F.R. § 300.320(a)(5); § 300.114; § 300.117.* **For the advocate's assessment:** consider requesting that the LRE explanation address nonacademic and extracurricular participation.

STATE-LAW NOTE

The following findings in this analysis turn on state rather than federal rule and should be confirmed against the applicable state's regulations and education agency before reliance:

- **Age of majority / transfer of rights (Section 10):** The document recites that rights transfer at 18. Under 34 C.F.R. § 300.520 the age of majority is defined by each state and varies; this memorandum does not confirm or contradict the recited age. Confirm the governing age and any advance-notice timeline against the applicable state code.
- **Triennial reevaluation timing and existing-data-review procedures (Section 6):** The three-year reevaluation rule is federal (34 C.F.R. § 300.303(b)(2)), but specific timelines, consent, and existing-data-review procedures can carry state-specific requirements; confirm against the state code.
- **Evaluation-group signature/date requirements (Sections 2, 6):** Whether each professional member of an evaluation group must sign and date the evaluation report is often a matter of state practice; confirm against the applicable state's evaluation requirements. The reviewed document does not include a signed evaluation report to assess.
- **ESY eligibility standards (Section 6):** The federal floor is set by 34 C.F.R. § 300.106, but the specific eligibility criteria and documentation standards are frequently state-defined; confirm against the state code.

This memorandum is a professional document review prepared for advocate or attorney use. It reflects an analysis of the written IEP document only and does not constitute legal advice. Findings should be verified against the complete educational record and applicable state-specific regulations before reliance in any proceeding.