IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

)	
J. S. and M. S. as parents and best	
friends of A.S.,	Case No.:
Plaintiffs	
vs.	
BOARD OF EDUCATION FOR	
SCHAUMBURG SCHOOL DISTRICT #54	
and THE STATE OF ILLINOIS,	
Defendants	

VERFIED COMPLAINT

Now come the plaintiffs, by and through their attorney, Steven E. Glink, and complaining against the defendants, state as follows.

JURISDICTION

- This action is brought pursuant to the Fourteenth Amendment to the Federal Constitution; the Individuals with Disabilities Education (Improvement) Act (IDEA),
 20 U.S.C. 1400 et seq.; Section 504 of the Rehabilitation Act of 1973, 29 USC 701, et seq. and The Americans with Disabilities Act (ADA), 42 USC 12101, et seq.
- 2. Jurisdiction is proper pursuant to 28 USC 1331
- 3. Venue is proper pursuant to 28 USC 1392.
- The school district's principal place of business is located in the Village of Schaumburg, Cook County, Illinois.
- All material acts related to this incident occurred in Schaumburg, Cook County Illinois.

THE PARTIES

- 6. Plaintiffs are citizens of the United States and residents of Schaumburg, Illinois.
- A.S. is an eleven (11) year old student currently enrolled as a student at the Hanover Highlands Elementary School, which is operated by the board of education for Schaumburg School District # 54.
- 8. J. S. and M.S. are A.S.'s biological parents.
- Schaumburg School District # 54 ("the district") is a local public school district organized pursuant to the Illinois School Code.
- 10. The Board of Education (BOE) is a group of citizens elected to operate and govern the school district.
- 11. The State of Illinois is the sovereign governmental entity that, amongst other things, enacts various laws in the State.
- 12. Plaintiffs have a private right of action under *Tennessee v. Lane* and its progeny.

STATEMENT OF MATERIAL FACTS

- 13. This case involves a challenge to Illinois' Medical Cannabis Pilot Program (MCPP) law, 410 ILCS 130, et. seq.
- 14. The child plaintiff has been medically diagnosed with leukemia, which was treated via chemotherapy. Those treatments have resulted in the child now suffering from seizure disorders and epilepsy.
- 15. The plaintiffs received treatments and traditional Western prescriptive medications for approximately four years in an attempt to regulate A.H.'s seizures and epilepsy. That was not successful and forced A.H. to take a substantial amount of medication.

- 16. The child plaintiff's treating physicians have prescribed medical cannabis to deal with her epilepsy and seizures.
- 17. At present, A.H. wears a medical cannabis patch on her foot as prescribed by her treating physicians. That patch contains small amounts of THC, the active residual ingredient of medical cannabis.
- 18. From time to time, when the patch alone is insufficient to control A.H.'s seizures/epilepsy, A.H. uses cannabis oil drops on her tongue or her wrists to regulate her seizures/epilepsy. Those drops also contain small amounts of THC.
- 19. A.S. has an IEP for her impairments. Her primary eligibility classification is intellectual disability. Her secondary eligibility classification is other health impairment (OHI). The IEP generally provides that A.S. is placed in a "mainstream" placement with a 1:1 aide.
- 20. Under the Illinois School Code's compulsory attendance law, 105 ILCS, 26-1 et seq.,A.S. is required to attend school and the parents are required to ensure that their daughter attends school.
- 21. On January 1, 2014, Illinois' Medical Cannabis Pilot Program (MCPP) became law. That law generally allows for the dispensing of cannabis to medically qualified individuals under certain terms, conditions and regulations.
- 22. The MCPP statute allows cannabis to be present in various locations (e.g. housing or places of employment). The MCPP also provides immunity from prosecution to those individuals listed in the statute.
- 23. One notable exception to the presence and immunity provisions of the MCPP statute are public schools, school buses and school employees (e.g. qualified patients may

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not possess or consume cannabis on school grounds or school buses; school employees are not immune from criminal prosecution for possession or distribution of medical cannabis; school personnel are not required to be qualified care givers who can administer medical cannabis). See: 410 ILCS 130/30.

- 24. Plaintiffs' treating physicians have informed the district's personnel that A.S. can suffer symptoms that require the administration of cannabis at any time during the school day.
- 25. Plaintiffs have requested the opportunity / ability to store and use/ consume cannabis on school property and for school personnel to help administer cannabis per doctors' order whenever A.S. suffers symptoms.
- 26. Citing the exclusionary provisions of the MCPP, the school defendant has declined to accommodate plaintiffs' requests (a copy of Dr. Nick Myers's (the assistant superintendent) email is attached as exhibit A).
- 27. Plaintiffs contend that there is no rational basis for the Legislature's decision to exclude students and schools from the application of the MCPP and that adherence to this law will deny this child her Constitutional right to due process of law as well as the full benefits of the defendants' educational services and programs.
- 28. Plaintiffs also contend that the school defendant's denial of their request for accommodations (e.g. the use of medical cannabis) violates the child's rights under the IDEA, the ADA and § 504 of the Rehabilitation Act.

COUNT I-FAILURE TO ACCOMMODATE

29. Plaintiffs reallege their allegations in ¶ 1-28 above as their allegations for this count.

- 30. Title II of the ADA prohibits local governmental entities from discriminating against a qualified individual with a disability by denying the qualified individual the full benefit of services, programs and/or activities on the basis of a disability.
- 31. The district, suable via the BOE, is a local governmental entity as defined by Title II of the ADA.
- 32. Title III of the ADA prohibits disability discrimination (e.g. denial of the full benefit of services, programs and/or activities) in places of public accommodation.
- 33. The district's schools are places of public accommodation as defined by Title III of the ADA.
- 34. Section 504 of the Rehabilitation Act prohibits the same type of discrimination as does the ADA but applies only to recipients of federal funds.

35. The district is a recipient of federal and state funds.

- 36. A.S. is a qualified individual with a disability as that term is defined by the ADA and/or Section 504 of the Rehabilitation Act because she has been diagnosed with the impairments of OHI, intellectual disability, seizure disorders and epilepsy.
- 37. A.S. is a qualified individual with a disability because the defendants regard her as having impairments that substantially limits her in daily life functioning via her IEP.
- 38. Dr. Toni Bark is also recommending that A. S. have access to medical cannabis at all times while at school. (Dr. Bark's letter is attached as ex. B).
- 39. Because the MCPP law prohibits medical cannabis in schools and because the minor plaintiff cannot attend school without the ability to have the immediate access and administration of medical marijuana if/when she becomes ill, the child cannot attend school.

- 40. The requested accommodations (e.g. allow the medical cannabis to be stored at the school; allow the child to use her medical cannabis as directed by her doctor and require a school employee to administer the cannabis to A.S. in compliance with doctor's orders) were and continue to be reasonable and necessary.
- 41. Defendants' forced denial of the plaintiffs' requested accommodations based on § 30 of the statute violates the child's rights under both the ADA and section 504 of the Rehabilitation Act because she is being denied the opportunity to attend school as required by state law and because she is being denied the opportunity to enjoy the full benefits of the school district's programs and services.

Wherefore, plaintiffs respectfully pray that pursuant to FRCP 65, this Honorable Court enter a preliminary injunction upon the defendants as follows:

- A. Ordering the BOE / the district to allow plaintiffs to store and maintain doses of medical cannabis in the school nurse's office;
- B. Ordering the BOE / the district to allow the student to access and consume her medical cannabis on school grounds, on school buses or at school related events in compliance with her doctor's orders;
- C. Ordering the BOE / the district to designate an employee (e.g. the school nurse) to assist the student with the ingestion / consumption of her medical cannabis on school property on an as needed basis;
- D. Order that the State of Illinois take no action against any person or entity to enforce the statute's prohibition against the presence or use of medical cannabis on school property;
- E. Enter any Order that is just and reasonable.

COUNT II-DENIAL OF FAPE

- 42. Plaintiffs reallege their allegation in ¶ 1-28 as their allegations in this count.
- 43. Under state law (105 ILCS 5-14-8.01, et seq) and federal law (IDEA), the district has an obligation to provide the plaintiff student with a FAPE.
- 44. To that end, the parents and the district have agreed on an IEP (a copy of which is attached hereto as exhibit C).
- 45. As a result of § 30 of the MCPP law's prohibition of medical cannabis on school property and school buses, the student plaintiff cannot attend school and because the student plaintiff cannot attend school, she is being denied a FAPE.
- 46. But for the provisions of the MCPP that prohibit the presence and ingestion of medical marijuana on school property, the district is ready, willing and able to provide the student plaintiff with a FAPE as required by law.
- 47. Strict application of § 30 of the MCPP law has the effect of denying the student plaintiff of her rights to a FAPE under federal and state law.

Wherefore, the plaintiffs respectfully pray that pursuant to FRCP 65, this Honorable Court issue a preliminary injunction upon the defendants as follows:

- A. Order the district/ BOE allow the plaintiffs to store the student's medical cannabis in the school nurse's office;
- B. Order the district / BOE to allow the student to access and consume her medical cannabis on school property, on school buses and at school related events in compliance with her doctor's orders;

- C. Order the district/ the BOE to designate an employee (e.g. the school nurse) to assist the student with her ingestion or consumption of her medical cannabis on school property on an as needed basis;
- D. Order that the State of Illinois take no action against any person or entity for the failure to comply with the statute's prohibition of the presence or use of medical cannabis on school property;
- E. Enter any other Order that the Court deems reasonable and just.

<u>COUNT III-VIOLATION OF CONSTITUTIONAL RIGHT TO DUE PROCESS</u> (DECLARATORY JUDGMENT)

- 48. Plaintiffs reallege their allegations in ¶1-46 above as their allegations for this paragraph.
- 49. As citizens of the United States, plaintiffs have the right to due process of law under the 14th Amendment to the Federal Constitution.
- 50. The MCPP statute (§ 30) bans the presence and use of medical cannabis on school property and school buses. Yet, the same statute allows the possession and use of medical marijuana at places of employment and certain residences.
- 51. The MCPP also provides various privileges and immunities to individuals who possess, consume or assist qualified users use medical marijuana pursuant to a doctor's order on the permitted locations. However, the MCPP does not provide the same privileges and immunities to the same individuals if the venue for use is school property.
- 52. A.H.'s use of her cannabis patch or cannabis oil at school would violate §30 of the Act.

- 53. The MCPP is an unconstitutional violation of A.S.'s Constitutional right to due process of law on its face and as applied to her because:
 - A. There is no rational basis for the distinction between the venues where medical cannabis is allowed and school property, where medical cannabis is expressly forbidden.
 - B. The statute is overbroad on its face;
 - C. The blanket prohibition of the presence and ingestion of medical cannabis on school property is not the least restrictive means to accomplish the Legislature's concerns because in most schools in this state, prescriptive medication for students is stored in the school nurse's office and administered there by a registered or certified nurse;
 - D. In this case, the district's staff is ready, willing and able to administer A.S.'s medical cannabis in compliance with doctor's order but will not do so for fear of criminal prosecution and/or disciplinary action by the State against the individual's professional license (see email from assistant superintendent Nick Myers, attached as ex. A);
 - E. Denying A.S. the use of her medical cannabis on school property when it is medically needed could lead to serious health issues including but not limited to death;
 - F. Denying A.S. the use of medical cannabis on school property will deny her the right to a FAPE, which is guaranteed by State and Federal law;

- G. Denying A.S. the use of medical cannabis on school property will deny her the full use and enjoyment of all facilities and programs at her school in violation of the ADA and § 504 of the Rehabilitation Act;
- H. Strict enforcement of the statute's prohibition against possession and use of medical cannabis on school property will prevent A.S. from attending school in violation of Illinois' compulsory attendance law, which in turn could lead to the prosecution of A.S. and/or her parents for violation of Illinois' truancy laws.
- 54. There is no realistic alternative to allowing A.S. to possess and ingest medical cannabis on school property (e.g. she cannot take her dosage in the morning) because the use of medical cannabis is based on symptomatology.
- 55. This part of the statute may affect other students and school employees in this State who have qualifying medical conditions and a legitimate medical need to use medical cannabis.
- 56. In 2016, the State of Colorado amended its medical marijuana law to allow a parent or a "primary caregiver" to administer medical marijuana on school grounds, on a school bus or at a school sponsored event (see: C.R.S. 22-1-119.3, aka Jack's Law).

Wherefore, plaintiffs respectfully pray that this Honorable Court declare that § 30 of the MCPP is unconstitutional on its face and as applied to A.S.

Plaintiffs further pray that this Honorable Court enter an Order barring the State of Illinois from enforcing this section of the statute.

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Plaintiffs further pray that the Court declare that no district employee who assists

A.S. with her use of medical cannabis may be subject to any criminal prosecution and/or

other administrative process based on their failure to comply with § 30 of the MCPP.

Respectfully Submitted,

By: s/STEVEN E. GLINK

STEVEN E. GLINK

LAW OFFICES OF STEVEN E. GLINK ATTORNEY FOR PLAINTIFFS ARDC # 6180869 3338 COMMERCIAL AVENUE NORTHBROOK, ILLINOIS 60062 847/480-7749 (Voice) 847/480-9501 (Facsimile)

Case: 1:18-cv-00181 Document #: 1-1 Filed: 01/10/18 Page 1 of 43 PageID #:12									
STUDENT NAME: A State State	DATE OF	MEETING: 04/05/2017							
INDIVIDUALIZED EDUCATION PROGRAM (CONFERENCE SUMMARY REPORT)									
DATE OF MOST RECENT EVALUATION: 04/05/2017 DATE OF NEXT EVALUATION: 04/04/2020									
Purpose of Conference (check all that apply)									
Review of K IEP FB Exisiting Data Review/Revision	A/BIP Graduation	n							
Initial IEP Secondary Manifestation Other:									
STUDENT IDENTIFIC	ATION INFORMATION								
STUDENT'S ADDRESS (Street, City, State, Zip Code)	STUDENT'S DATE OF BIRTH	SIS ID NUMBER							
MALE ETHNICITY White LANGUAGE/MODE OF COMMUNICATION USED BY STUDENT 000: English	CURRENT GRADE LEVEL 5	ANTICIPATED DATE OF HS GRADUATION							
PLACEMENT(To be completed after placement determination) 03: (age 6-21) < 40% inside regular ed	DISABILITY(S) Intellectual Disability, Other Health Impairment	MEDICAID NUMBER							
RESIDENT DISTRICT 05016054004: Community Consolidated School District 54	SERVING DISTRICT 05016054004: Community Consolidated School District 54								
PLACI	EMENT								
RESIDENT SCHOOL 2005: Campanelli Elementary School	SERVING SCHOOL 2013: Hanover Elementary School								
PARENT/GUARDI									
(1) PARENT'S NAME Educational Surrogate	(2) PARENT'S NAME	Educational Surrogate Parent							
(1) PARENT'S ADDRESS(Street, City, State, Zip Code)	(2) PARENT'S ADDRESS(Street, Cit								
(1) PARENT'S TELEPHONE NUMBER(include Area Code) Home: (847)	(2) PARENT'S TELEPHONE NUMB Home: (847)	ER(include Area Code)							
(1) LANGUAGE/MODE OF COMMUNICATION USED BY PARENT(S) English	(2) LANGUAGE/MODE OF COMMI English	UNICATION USED BY PARENT(S)							
Yes X No Interpreter	Yes X No Interpreter								

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STUDENT NAME: A		DATE OF MEETING: 04/05/2017
	PROCEDURAL SAFEGUARDS	
Explanation of Procedural Safeguards were	provided to/reviewed with the parent(s) on	04/05/2017
Transfer of Rights - Seventeen-year old stu reaching age 18.	dent informed of his/her rights that will transfer to the	student upon Yes X No
Parent(s) were given a copy of the:	 Evaluation report and eligibility determination District's behavioral intervention policies 	n X IEP District's behavioral intervention procedures (initial IEP only)
	PARTICIPANTS INFORMATION	

Signature indicates attendance. Check appropriate boxes to indicate which meetings were attended. Anyone serving in a dual role should indicate so on the following lines. If a required participant participates through written input or is excused from all or part of the IEP meeting, the required excusal and written report, as necessary, is attached.

ELIGIBILITY REVIEW	ШР		ELIGIBILITY REVIEW	IEP	
x	x	J arren Skill			
		Parent			School Social Worker
X	x	Multiple Suit	x	X	Marlene Smith
		Parent			Speech-Language Pathologist
		Student			Bilingual Specialist
x	x	Cynthia Gordon			
		LEA Representative			Interpreter
x	X	Faith Rivera	X	x	Paula Barnas
		LEA Representative			Other
x	x	Laura Masters	×	x	Janet Bellefontaine
		General Education Teacher			Other
x	X	Cayla Borgetti	×	x	Majorie Getz
		Special Education Teacher			Other
x	x	Leslie Baker	x	x	Donna Joyce
		School Psychologist			Other

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STUDENT NAME:

A

S

DATE OF MEETING: 04/05/2017

DOCUMENTATION OF EVALUATION RESULTS

Complete for initial evaluations, reevaluations, or a review of an independent or outside evaluation.

Considering all available evaluation data, record the team's analyses of the student's functioning levels. Only those areas which were identified as relevant to the current evaluation must be completed. All other areas should be noted as "Not Applicable". Evaluation data may include: parental input, teacher recommendations, physical condition, social or cultural background, adaptive behavior, record reviews, interviews, observations, testing etc. Describe the observed strengths and/or deficits in the student's functioning in the following domains.

Academic Achievement (Current or past academic achievement data pertinent to current educational performance.) Low Incidence Assessment results available. See present levels of performance for further information.

Functional Performance (Current or past functional performance data pertinent to current functional performance.) OT: Ashley scored as follows on the Beery VMI-6th Edition (Full Form):

VISUAL-MOTOR INTEGRATION: Raw Score: 6 Standard Score: Unable to score. Percentile: Unable to score. Age Equivalent: 2 years, 10 months.

VISUAL PERCEPTION: Raw Score: 8 Standard Score: Unable to score. Percentile: Unable to score. Age Equivalent: 2.11 years

MOTOR COORDINATION: Raw Score: 3 Standard Score: Unable to score. Percentile: Unable to score. Age Equivalent: < 2years, 11 months.

SENSORY PROCESSING: Not formally tested. By observation this past school year, A the set is very distracted by what she sees in her environment, by movement or sound within the working environment. She is able to imitate 3 out of 8 simple yoga postures. She can be sensitive to light touch but now tolerates using sand to practice letters in.

SELF CARE: A can pull off her shoes. When putting her shoes on, she frequently puts her shoes on the wrong foot and requires verbal and visual prompts to put them on the correct foot. She can pull the Velcro to fasten her shoes. She can put her coat on when the sleeves are pulled out by an adult but at times she may be more distracted and may not recognize which side of the coat is the top or bottom or she may put her hand in the wrong hole or pocket and need verbal prompts to look again at what she is doing. She is unable to fasten the zipper on her coat but can pull up and down the zipper once fastened for her. She requires assist to put gloves on.

continues to qualify for OT services in the academic setting.

Cognitive Functioning (Data and other Information regarding intellectual ability; how the student takes in information, understands information, and expresses information.)

Previous psychological evaluation notes a WISC-IV VCI of 50, a PRI of 45, a WMI of 56, a PSI of 50. The KBIT notes a Verbal score of 54 and a Nonverbal score of 46, FSIQ 48 Outside evaluation results also note similar results given the Leiter and Stanfrod-Binet. See file for further information.

Communicative Status (Information regarding communicative abilities (language, articulation, voice, fluency) affecting educational performance.) Results of the current Speech and Language Evaluation indicate that Ashley's receptive and expressive communication skills are significantly impaired. Please see the attached Speech and Language Evalulation Report for specific test scores and interpretation.

For ELL students explain ELL STATUS:

Has Linguistic status changed?

I No

Health (Current or past medical difficulties affecting educational performance.)

Student with seizure disorder and history of leukemia. See Health evaluation for further information.

Hearing/Vision (Auditory/visual problems that would interfere with testing or educational performance. Include dates and results of last hearing/vision test.)

Passed Vision and Hearing Screening on 11/1/16

Motor Abilities (Fine and gross motor coordination difficulties, functional mobility, or strength and endurance issues affecting educational

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STUDENT NAME:

A

S

DATE OF MEETING: 04/05/2017

DOCUMENTATION OF EVALUATION RESULTS

performance.)

Physical Therapy/Gross Motor: PT: A was tested using the Test of Gross Motor Development – 2 (TGMD-2), which is a standardized test that measures gross motor abilities in children ages 3-10. It is used to determine how a student's gross motor skills compare to those of same age peers. It tests the two areas of locomotor skills and object control (manipulative) skills. There are 6 locomotor tests; run, gallop, hop, leap, horizontal jump and slide. There are also 6 object control tests; striking a stationary ball, stationary dribble, catch, kick, overhand throw, underhand roll.

On the locomotor subtest, A scored in less than the 1st percentile with an age equivalent of 3.0 years of age. On the object control subtest she scored in less than the 1st percentile with an age equivalent of less than 3 years of age. Her scores indicate significant motor delays. Her overall motor score was also less than the 1st percentile and her gross motor quotient, which is a composite of the two tests, was 46 which has a descriptive rating of very poor.

A structure in the academic and related social aspects of an educational program. This assessment looks at a student's ability to participate in the academic and related social aspects of an educational program. The areas of function that were assessed included travel in the school environment, changing and maintaining positions for participation, manipulation of movement within the learning environment and recreational movement or access to play activities and playground. A subject is abilities to perform these tasks were assessed. Her performance on these skills was scored on a criterion based scale comparing her results to similar students in a similar educational setting. Comparison of A screek with those of other students in a special education 4-6th grade setting shows that her functional motor skills at school are all average to below average. See Physical Therapy evaluation for further information.

Social/Emotional Status/Social Functioning (Information regarding how the environment affects educational performance--life history, adaptive behavior, independent functioning, personal and social responsibility, cultural background.)

The Vineland-II Teacher Rating Form was completed by her special education teacher. The Parent/Caregiver Form was not completed. Ashley received an overall Adaptive Behavior Composite Score within the Low range. Additionary received scores within the Low range for all domains (Socialization, Daily Living Skills, and Communication) as well as all sub-domains within these areas. Please reference Social Developmental Evaluation for further information.

	Cas	se: 1:1	8-cv-00181 Doc	ument #: 1-1 Fi	led: 01/1	0/18 F	Page 5 of 43 PageID	#:16
STUDEN	NT NAMI	E: A	S				DATE OF MEETING:	04/05/2017
			ALL DISABILITIES	ELIGIBILITY DET (OTHER THAN S			NG DISABILITY)	
1.17 1.197. 1	1.00			DETERMINAN	T FACTOR	S		
The deter	rminant fa	ctor for th	ne student's suspected dis	sability is:				
Ye:	s XI	No	Lack of appropriate ins Provided):	struction in reading, inc	luding the ess	ential co	mponents of reading instruction	on (Evidence
	Teacher througho	s receive out the ye	e thorough training on	the implementation o I mentor. Students a	f curriculum	and on-	ssential areas of reading. going mentoring nes a year using a low	
🗌 Ye	s XI	No	Lack of appropriate ins	struction in math (Evide	ence Provided):		
	A implemente to measure	ntation c	of curriculum. Students	math curriculum. Te s are assessed three	eachers rece times a yea	ive train r with a	ing and mentoring in the low incidence assessment	
Ye:	s XI	ю	Limited English Profic	iency (Evidence Provid	ded):			
		• •	ıks English.					
	the above are "no," c			o <u>t eligible</u> for services u	Inder IDEA a	nd the te	am must complete Step 1 and 4	4 below. If all of the
		COMPL	ETE FOR STUDEN	ITS SUSPECTED	OF HAVIN	G A DI	SABILITY UNDER IDEA	
STEP 1 -	- DISABI	LITY						
	No Disal Conferen	oility Iden ce Summ	ntify - (Complete Step 4 ary Report page.)	and write "Not Eligible	<u>e</u> for Special I	Education	n Services" in the Disability se	ection of the
x	Disabilit	y Identifi	ied Based on the team's	analysis, identify the di	sability(s):			
	Primary	Seconda	ry		Primary	Seconda	ary	
			Autism (O)				Multiple Disabilities (M)	
			Deaf/Blindness (H)				Orthopedic Impairment (C)	
			Deafness (G)			X	Other Health Impairment (L	.)
			Developmental Delay	(3-9) (N)			Speech or Language Impair	ment (I)
			Emotional Disability (K)			Traumatic Brain Injury (P)	
			Hearing Impairment (I	7)			Visual Impairment including	g Blindness (E)
	×		Intellectual Disability	(A)				
Step 2 -	ADVERS	E AFFE	CTS					
	No Adve Conferen	erse Effe	ct Identified. (Complete nary Report page.)	Step 4 and write "Not	Eligible for S	pecial Ec	lucation Services" in the Disat	bility section of the
×		Effect I		oility identified, describ	e how the dis	ability ac	iversely affects the student's ea	ducational
	•		impairment impacts l	earning and develop	ment of adap	tive beh	avior skills across all setting	as.

Acception of adaptive behavior skills across an settings. Accepts seizures also impact cognitive functioning and behaviors seen in the school setting. Her alertness and focus are adversely impacted. In addition, Accept is more likely to display negative behaviors following a seizure.

STEP 3 - EDUCATIONAL NEEDS

State to what extent the student requires special education and related services to address educational needs.

A second requires a small, self-contained special education environment that utilizes a modified curriculum with concepts presented in incremental steps with plenty of opportunity for repetition. A second requires 1:1 assistance throughout the day due to the risk of seizures and to assist A second with routines and expectations. A second requires speech and language, occupational therapy, physical therapy, and psychological and/or social work services.

STEP 4 - ELIGIBILITY

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STUDENT NAME: A DATE OF MEETING: 04/05/20								
	ELIGIBILITY DETERMINATION							
	ALL DISABILITIES (OTHER THAN SPECIFIC LEARNING DISABILITY)							
Based of	Based on the steps above, the student is entitled to special education and related services.							
	No (Not Eligi	ole) x	Yes (Eligible)					

ISBE 34-54 (8/15) Illinois State Board of Education, Special Education Services, 100 North First Street, Springfield, Illinois 62777-0001 6 of 43

STUDENT NAME:

DATE OF MEETING: 04/05/2017

DOCUMENTATION OF INTERVENTION/EVALUATION RESULTS (SPECIFIC LEARNING DISABILITY)

Complete for initial evaluations, reevaluations, or a review of an independent or outside evaluation when a specific learning disability is suspected.

As part of the evaluation process, relevant behavior noted during observation in the child's age-appropriate learning environment, including the general education classroom setting for school-age children, and the relationship of that behavior to the child's academic functioning and educationally relevant medical findings, if any, must be documented.

PROBLEM IDENTIFICATION / STATEMENT OF PROBLEM:

S

Using baseline data, please provide an initial performance discrepancy statement for all identified areas of concern in the relevant domains [academic performance; functional performance; cognitive functioning, communicative status (for ELL students include an explanation of ELL status and any change in linguistic status); social/emotional status/functioning, motor abilities, health, hearing and vision] including information about the student's performance discrepancy prior to intervention. Attach evidence.

PROBLEM ANALYSIS / STRENGTHS AND WEAKNESSES:

Describe student's skill strengths and weaknesses in the identified area(s) of concern within the relevant domains. Attach evidence, including evidence of skills deficit versus performance deficit.

PLAN DEVELOPMENT / INTERVENTION(S):

A

Describe the previous and current intervention plan (core/Tier 1, supplemental/Tier 2, and intensive/Tier 3) including evidence that the intervention is scientifically based and was implemented with integrity. Attach plan/evidence.

PLAN EVALUATION / EDUCATIONAL PROGRESS:

Provide documentation of student progress over time as a result of the intervention. Attach evidence/graphs.

PLAN EVALUATION / DISCREPANCY:

State the current performance discrepancy after intervention, i.e., the difference between a student's level of performance compared to the performance of peers or scientifically-based standards of expected performance. Attach evidence.

PLAN EVALUATION / INSTRUCTIONAL NEEDS:

Summarize the student's needs in the areas of curriculum, instruction, and environment. Include a statement of whether the student's needs in terms of materials, planning, and personnel required for intervention implementation are significantly different from those of general education peers. Attach evidence.

ADDITIONAL INFORMATION NECESSARY FOR DECISION-MAKING (INCLUDE AS APPROPRIATE):

Report any educationally relevant information necessary for decision-making, including information regarding eligibility exclusionary and inclusionary criteria. Attach evidence.

STUDENT	NAME:
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Conservation for the states

A

S

DATE OF MEETING: 04/05/2017

ELIGIBILITY DETERMINATION

(SPECIFIC LEARNING DISABILITY)

Complete f suspected.	Complete for initial evaluations, reevaluations, or a review of an independent or outside evaluation when a specific learning disability is suspected.							
		DETERMINANT FACTORS						
The determi	inant factor for	the student's suspected disability is:						
Yes Yes	🔲 No	Lack of appropriate instruction in reading, including the essential components of reading instruction (Evidence Provided)						
🗌 Yes	🗌 No	Lack of appropriate instruction in math (Evidence Provided)						
Yes	No No	Limited English Proficiency (Evidence Provided)						

If any of the above answers is "yes," the student is not eligible for services under IDEA and the team must complete the Eligibility Determination section accordingly. If all of the answers are "no," complete the following sections

				EXCLUSIONARY CRITERIA
The tea area:	am det	ermi	ned that the	following factors are the primary basis for the student's learning difficulties. Document the source of evidence in each
ים	Yes		No	A visual, hearing or motor disability:
<u> </u>	Yes		No	Intellectual Disability
	Yes		No	Emotional disability
	Yes		No	Cultural Factors
	Yes		No	Environmental or economic disadvantage

If any of the boxes immediately above is checked "yes," the student cannot have a specific learning disability and the team must complete the Eligibility Determination section accordingly.

		INCLUSIONARY CRITERIA							
Educati Evidenc	Educational Progress (Over Time) Evidence in the Documentation of Evaluation Results should support the team's answer to this question.								
Is the stu (Select (gressing at a significantly slower rate than is expected in any areas of concern?							
	No								
	Yes	The student is progressing at a significantly slower rate than expected.							
	Yes	The student is currently making an acceptable rate of progress but only because of the intensity of the intervention that is being provided.							
If yes, in	n which a	rea(s)?							

Discrepancy (At One Point in Time)

Evidence in the Documentation of Evaluation Results should support the team's answer to this question.

Is the student's performance significantly below performance of peers or expected standards in any areas of concern? (Select One)

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STUD	ENT NAI	ME: A DATE OF MEETING:	04/05/2017
		ELIGIBILITY DETERMINATION	
_		(SPECIFIC LEARNING DISABILITY)	
	No		
	Yes	The student's performance is significantly discrepant.	
	Yes	The student's performance is not currently discrepant but only because of the intensity of the intervention tha provided.	at is being
If yes, i	in which a	area(s)?	
	tional No. ce in the	eed Documentation of Evaluation Results should support the team's answer to this question.	
	education	s needs in any areas of concern significantly different from the needs of typical peers and of an intensity or type n resources?	that exceeds
	No		
	Yes	The student's instructional needs are significantly different and exceed general education resources.	
If yes, i	n which a	area(s)?	
If any o team m	of the box ust comp	xes in this section (Inclusionary Criteria) are marked "No", the student does not have a Specific Learning Dis olete the Eligibility Determination section accordingly.	sability and the
After d		ria ng that the criteria in the preceding section are met, the district may choose to use an IQ-achievement discrepancy plete this section.	y model. If using
IQ-Ach	ievement	Discrepancy:	
י 🗆	′es 🗌	NO NA Does a severe discrepancy exist between achievement and ability that is not correctable education and related services? (<i>Please refer to evidence in Documentation of Evaluation</i>)	without special n Results)
	in which :	education and related services? (Please refer to evidence in Documentation of Evaluation	without special n Results)
		education and related services? (Please refer to evidence in Documentation of Evaluation area(s)?	without special n Results)
If yes,	in which a	education and related services? (Please refer to evidence in Documentation of Evaluation	without special n Results)
If yes,	in which a	education and related services? (Please refer to evidence in Documentation of Evaluation area(s)? ELIGIBILITY DETERMINATION	n Results)
If yes, Step 1: If the a	in which : Disabili Yes	education and related services? (Please refer to evidence in Documentation of Evaluation area(s)? ELIGIBILITY DETERMINATION ity Adversely Affecting Educational Performance No Based on the answers to the questions in the "Determinant Factors, Exclusionary Criteria," and "In Criteria," sections, does the student have a specific learning disability? "no," the student is <u>not eligible</u> for special education services under the category of Specific Learning Disability	n Results)
If yes, Step 1: If the a completion	in which : Disabili Yes enswer is ete Step 2	education and related services? (Please refer to evidence in Documentation of Evaluation area(s)? ELIGIBILITY DETERMINATION ity Adversely Affecting Educational Performance No Based on the answers to the questions in the "Determinant Factors, Exclusionary Criteria," and "In Criteria," sections, does the student have a specific learning disability? "no," the student is not eligible for special education services under the category of Specific Learning Disability 2 below. "yes," indicate the area below and complete Step 2.	n Results)
If yes, Step 1: If the a completion	in which is Disabili Yes	education and related services? (Please refer to evidence in Documentation of Evaluation area(s)? ELIGIBILITY DETERMINATION ity Adversely Affecting Educational Performance No Based on the answers to the questions in the "Determinant Factors, Exclusionary Criteria," and "In Criteria," sections, does the student have a specific learning disability? "no," the student is not eligible for special education services under the category of Specific Learning Disability 2 below. "yes," indicate the area below and complete Step 2. reading skills Mathematical calculation	n Results) Inclusionary and the team must
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STUDENT NAME: A

DATE OF MEETING: 04/05/2017

PRESENT LEVELS OF ACADEMIC ACHIEVEMENT AND FUNCTIONAL PERFORMANCE

Complete for initial IEPs and annual reviews

When completing this page, include all areas from the following list that are impacted by the student's disability: academic performance, social/emotional status, independent functioning, vocational, motor skills, and speech and language/communication. This may include strengths/weaknesses identified in the most recent evaluation.

Student's Strengths

A enjoys music, working on the computer and iPad, being at school, coloring, and dancing.

Parental Education Concerns/Input

Student's Present Level of Academic Achievement (Include strengths and areas needing improvement)

S

The following information is compiled from three primary sources. A participates in the Low Incidence Assessment which generates specific data regarding his/her skills in several academic areas. She is also observed during the daily classroom routine, and her performance is documented via data collection forms, as well as informal observational notes and common assessments. A significant is also observed by her related services professionals, and her skills are documented on an ongoing basis.

LITERACY: A series enjoys reading books, creating her own stories, and being read to. With adult prompting, she participates during shared reading. She can recognize the title of a book, but is working on identifying the title page, author, and illustrator. A series currently reading at a B level in Reading A to Z. She can identify all letters in the alphabet and is reading pre-primer dolch words. She is currently reading/identifying 34/40 preprimer words and 12/40 primer words.Given a book written at the preprimer level with sentences divided into two two-word phrases, Ashley accurately reads the sentence while tapping each phrase 20% of trials. If you tell her the sentence before she reads it, she is more successful, but has difficulty reading a sentence on her own. She will add to the end of the sentence or will find a word in the sentence and create her own sentence based on the word.

MATH: Given a group of 5 objects, A first accurately counts the set of objects while moving or tapping each object only once on average for 2 out of 5 trials or 40% of opportunities. She is more successful if the 5 objects are the same object and simple, such as pattern blocks. If you give her more than one different shape or "busy" objects (ex. frozen characters), she has difficulty counting the group of objects. When counting, A first has a hard time stopping at the number of objects in front of her. She will continue to count on until told to stop. A first demonstrates the ability to independently sequence at least 3 pictures into logical order in 0% of the time. With adult prompting, A first is able to sequence 3 pictures into logical order 50% of trials.With adult support, A first can complete an AB pattern and needs hand over hand for ABB or ABC pattern. A first requires manipulatives, images, or drawings when comparing or counting groups of objects. A first is working on identifying which group has "more" or "less" and the value of coins. 1

Student's Present Level of Functional Performance (Include strengths and areas needing improvement)

uses a mature and functional grasp of her writing or art utensil. Her coloring skills have improved and OT: A demonstrates she frequently colors most of a large picture, with only some strokes going over the lines. A significant difficulty staying visually focused on tasks and visually tracking from left to right and upward to downward and reverse, looses visual focus at her midline and often before she reaches her midline. This significantly impacts her ability to perform such tasks as reading from left to right, fastening her zipper, counting objects successfully from left to right and following directions because she has difficulty staying visually focused on a task for instruction and visually tracking. A simple to imitate 3 out of 8 simple Yoga postures. She frequently does not use her hands bilaterally when necessary, such as stabilizing the paper with her opposite hand as she performs paper and can write the first 3 letters of her name in upper case letters. She can make a lower case pencil or art tasks. A "I" but has only demonstrated the ability to form an upper case "L" 3 times this past year. A can motor plan with very familiar and practiced tasks, such as coloring, using her hands bilaterally to roll out a ball of Theraputty. Motor planning for unfamiliar or less familiar tasks is frequently difficult for A At times she demonstrates sensitivity to light touch, but this has improved and she now tolerates hand over hand assist to trace/form letters and can use sand to practice letter formation in, In the past she has refused to use the sand. She can recognize a highly familiar object such as a cat or dog, when only the outline of the animal is shown to her. A does best when tasks are presented one at a time because she has difficulty visually filtering out other parts of a task. She can put on her coat when an adult pulls the sleeves out for her and when she is not distracted. Her difficulty maintaining visual focus and challenges in fine motor and motor planning skills interfere with her ability to fasten the zipper on her coat, however she can pull up and down the zipper independently. A can take off her shoes but may forget to unfasten the Velcro first. She frequently tries to put her shoes on, on the wrong foot and requires 1 to 4 verbal prompts and at times a visual prompt to put the correct shoe on. She can fasten the Velcro on her shoes but has requires adult assist to put on her gloves because she has difficulty pulling the Velcro through the clasp first. A difficulty recognizing which is the "up" side of the gloves and difficulty motor planning for placing her fingers and thumb into the correct holes in the glove. A has difficulty buttoning/unbuttoning a large button. She can stack up to 12 1" cube blocks but has difficulty imitating a pyramid, train or wall. She can copy the number 1 but did not

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STUDENT NAME:

A

DATE OF MEETING: 04/05/2017

PRESENT LEVELS OF ACADEMIC ACHIEVEMENT AND FUNCTIONAL PERFORMANCE

copy numbers 0,2,3,4,5,6,7,8,or 9. She demonstrates the ability to perform in-hand manipulation of 5 pennies when it was demonstrated for her. A simple simple simple with motor planning, difficulty visually tracking and maintaining visual focus frequently interfere with task success. A supplears to try her best with most adult directed tasks and puts effort into her work, even when challenging for her. At times she will ask for help, even before she tried a task, but will try when verbally prompted.

A continues to qualify for occupational therapy services in the school setting to address delays in fine motor, visual-motor and visual perception skills and motor planning/coordinaton skills.

PT/Gross Motor: A seen by physical therapy in a one on one setting and during adapted physical education class. Therapy has been focusing on bilateral coordination and coordinated motor movements to facilitate gross motor skill development and participation in PE activities. The measurable goal for therapy was that A would be able to do hands up and feet apart, hands down and feet together and then a full jumping jack. Ashley has not completed that goal and has not made expected progress. A has a lot of challenges coordinating her arms or her legs to correctly completing this or any movement. She has difficulty completing simple 1-2 step motor movements. Strategies such as stepping apart and together rather than jumping, separating arms only and legs only, using a mirror, demonstration, verbal cues, and visual cues on the floor to help with feet apart and together, picture cues and consistent practice, have all been tried in therapy without success. A has a difficult time visually following directions and often will close her eyes when asked to look at something. When she is given verbal direction, she seems to have even more difficulty following directions for motor skills, especially if verbal directions are repeated more than once. She is willing to try and does so cheerfully but just lacks the motor planning and coordination to successfully complete motor skills. When asked to roll on her back, she will frequently roll on her stomach or vice versa. When asked if she is correct she usually responds yes because she lacks body awareness to know what is correct. A **short** is able to do simple yoga moves such as down dog, cat and cobra. She enjoys dancing in gym class but has difficulty coordinating specific steps. She is able to propel a scooter sitting or on her stomach.

Her skills over the past year have seemed to have regressed. A playground size ball with a partner from 5-8 feet. At this time she is unable to consistently catch a ball. She will not look to see if the ball is coming to her. She has difficulty without hand over hand assistance to get her arms or hands in position to catch and she will often let the ball bounce off of her chest or put her hands up and just deflect the ball away rather than catch it. She can be given a floor marker for position to stand in for catching, but she has significant difficulty even maintaining her position. She is able kick a ball from a stationary position. She lacks control of the kick or the direction of the kick. She doesn't seem to grasp the instruction at times to kick a ball toward a goal or in a particular direction.. When attempting to strike a stationary ball off of a tee, she needed an adult to place her hands correctly on the bat. Even with demonstration she was unable to grasp the bat on the correct end. She had difficulty holding the bat with two hands. She had difficulty standing in the correct position next to the tee. When placed in the correct position she could not stand still by the tee and would move about. She was unable to swing the bat at the ball but would chop the ball off the tee. She was unable to dribble a ball even with demonstration. She would kick the ball and when asked " are you using your hands?" would answer yes while kicking. When the ball was placed in her hands with a demonstration to dribble, she would just throw the ball. In would not look at the target she was throwing towards, even after her attempts to overhand throw to a target, A being given verbal cues and pointing to the target. She did throw the ball but she jus throws from her shoulder with no wind up and generally throws any direction and not at the target she is aiming for. Her follow thru after throwing is a flailing movement of her arms. She is able to jump with two feet but her feet are not always together at either take off or landing. She is unable to jump forward or hop on one foot. She can stand and balance momentarily on one leg. When attempting to leap, Attempwill step over a bean bag but is not able to do a running leap. She attempts to gallop and the skill is emerging but she can not maintain a rhythmic pattern. She is not able to skip yet demonstrates significant challenges with motor planning, coordination and functional motor or side slide. A skills for daily participation in a special education program. She requires considerable supervision or contact quard for safety, wears a helmet to decrease risk of head injury during falls and requires assistance for most functional movements. She is willing to try and eager to please adults but sometimes get frustrated when the task is challenging or difficult for her. Educationally relevant physical therapy will continue to address areas of need.

SELF-HELP SKILLS/CLASSROOM FUNCTIONING: A is working on completing familiar tasks (such as taking off or putting on her coat, throwing away her trash, peeling a banana) independently, with 1 verbal reminder that "she can do it". A set will prompts or gestures when putting on a seatbelt, putting on her shoes/boots, and brushing her teeth. At times, A will become upset after using the bathroom or having seizures. She will refrain from starting any tasks, call teachers or students names, hit teachers, spit, and yell inappropriate words. This behavior was inconsistent during the time span that it occurred. We have not seen much of this behavior since January 2017. A set requires resting breaks throughout the day and frequent breaks during lessons. When given a verbal direction, A set requires herself repeating it back in order for her to correctly attempt the task given.

SCHOOL PSYCHOLOGIST: A participates in a weekly social group and during various classroom activities such as "free time" at the end of the day. During weekly groups A state is learning about personal safety,

STUDENT NAME:

A

S

DATE OF MEETING: 04/05/2017

PRESENT LEVELS OF ACADEMIC ACHIEVEMENT AND FUNCTIONAL PERFORMANCE

community safety, social interaction, social-communication, and functional daily living and school functioning skills, will volunteer responses when she Is listening and following along with the class activity. She does require frequent prompts to remain on task. Difficulty with sustained attention seems to be a significant area of concern for She can become easily distracted and seems to have difficulty following more than one step directions independently. With a one step direction she requires several prompts before beginning the task. She may become overly silly, laughing or making noises at times when she should be listening and following along. Her interest in others appears limited. However, when another student has a toy that she is motivated to use she can use appropriate social interaction skill in terms of approaching the peer, asking to play using a kind and gently tone of voice, and cooperating during play. Outside of these times, A generally presents as being disinterested in interacting with others. She does not present with any consistent observed sensory concerns. At times she will say she is tired in almost a rote manner. However, her behavior and appearance at the time does not seem to match the statement. At other times she states that something is too loud but it may or may not be at a time when noise is present. At other times when there is a great deal of noise she does not make this statement. At seems to enjoy music being played at a loud level and enjoys dancing around and singing. During these times she is not bothered by peers who may be loud. She does not display any repetitive behaviors per observations thus far. is observed to be a happy child with no significant behavioral concerns aside from those observed Overall, A on occasion after a seizure and/or bathroom use as noted by the classroom teacher.

Communication: A has been receiving Speech and Language Therapy this school year to develop her receptive and expressive language skills. Therapy goals have focused upon the areas of language processing, language form and language content. Currently A has been having great difficulty performing language tasks presented. She is highly distracted by visual and auditory stimuli. She also will frequently engage in distracting behaviors and/or elicit off-topic comments which impede her ability to successfully perform language tasks. She requires constant redirection to focus on tasks and needs to have any auditory information repeated multiple times. At the end of the first trimester, A had made gains on some of her language goals, however, as the year has progressed, A have s skills have regressed.

>In November, A was able to visually and verbally sequence 3-4 action pictures in 2 out of 4 attempts . Currently, however, she has not been able to perform a sequencing task independently. She requires adult prompting in order to sequence 3 pictures in 50% of trials.

A state had also been making progress towards achieving her goal to verbally state a problem within a picture, using an accurate subject, predicate and prepositional phrase. In November, she was able to explain simple visual absurdities in 2/3 attempts. To explain pictures which related to safety or life situations, she needed adult support to be successful in 1/3 attempts. At this time, she has been able to identify simple visual absurdities in 3/3 attempts but has only been able to explain them when significant adult support is provided in 1/3 attempts.
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Health/Vision and Hearing

trials, and reduction of stimuli have not been facilitative.

See Health Evaluation Update dated 2/2/17. A state is has Acute Lymphocytic Leukemia continues to be in remission. A seizure disorder and is currently taking the seizure medications Vimpat and Onfi and is under the care of Dr. Margaret Michelson, neurologist. Per Report from Dr. Getz, diagnostic impression include mild cognitive impairment, features of ADHD, and features of Autism Spectrum Disorder.

Describe the effect of this individual's disability on involvement and progress in the general education curriculum and the functional implications of the student's skills.

- · For a preschool child, describe the effect of this individual's disability on involvement in appropriate activities.
- By age 141/2, describe the effect of this individual's disability on the pursuit of post-secondary expectations (living, learning, and working).

Attempts cognitive impairment and seizures which adversely impact stamina, alertness, and focus, adversely impact academic and adaptive behavior skills across all settings.

GOALS AND OBJECTIVES/BENCHMARKS

Complete for initial IEPs and annual reviews. (Anyone responsible for implementing the IEP (e.g., goals and objectives/benchmarks, accommodations, modifications and supports) <u>must be notified</u> of her/his specific responsibilities.)

		REPORTING ON GOAL	S					
The progress on annual goals will be measured by the short-term objectives/benchmarks. Check the methods that will be used to notify parents of the student's progress on annual goals and if the progress is sufficient to achieve the goals by the end of the IEP year:								
X Report cards	× Progress reports	Parent conference		Other (specify)				

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STUDENT NAME: A State State

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	GOALS AND OBJECTIV	ES/BENCHMARKS	
The goals and short-term objectives including involvement in and progra	or benchmarks shall meet the stude ess in the general curriculum, or for	ent's educational needs that result from preschool students, participation in ap	n the student's disability, propriate activities.
GOAL# <u>1 of 11</u>			
Current Academic Achievement and			
education peers and standards.		sessments relevant to this goal; performa	
A Calle demonstrates sign hands are required for a ta attempts per month.	ificant delays in motor planning and ask, A nnan requires adult verbal, v	d has difficulty using her hands bilate isual or touch prompts to use both ha	rally. When both ands in 3 of 4
Goal Statement:			
By April 2018, in the thera when necessary, to comp measured by Data Charts	lete a task, with a max. of 2 verbal	I demonstrate the ability to use her h prompts per task, for 3 out of 4 attem	ands bilaterally pts per month, as
Indicate Goal Area:	ademic X Functional 7	Transition Illinois Learning	Standard #
Title(s) of Goal Implementer(s) Occupational Therapist, C	classroom Teacher		
 #1 - By June 2017, in the bilaterally when necessary Evaluation Criteria % Accuracy 1 / 4 # of attempts X Other (specify) 	Measuring Progress on the Annual Go therapy or classroom setting, A y, to complete a task, with a max. o Evaluation Procedures Observation Log X Data Charts Tests	will demonstrate the ability to use I	ner hands Dates Reviewed/ Extent of Progress By June 2017.
per month	Other (specify)	Semester _X Other (specify) monthly	
#2 - By November 2017,	Measuring Progress on the Annual Go in the therapy or classroom setting, ask, with max. 2 verbal prompts.		use her hands
Evaluation Criteria	Evaluation Procedures	Schedule for Determining Progress	Dates Reviewed/ Extent of Progress
% Accuracy 2 / 4 # of attempts X Other (specify) per month	Observation Log X Data Charts Tests Other (specify)	Daily Weekly Quarterly Semester Other (specify)	By November 2017.
		monthly	

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STUDENT NAME: A

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DATE OF MEETING:

04/05/2017

GOALS AND OBJECTIVES/BENCHMARKS

Short-Term Objective/Benchmark for Measuring Progress on the Annual Goal

#3 - By April 2018, in the therapy or classroom setting, A will demonstrate the ability to use her hands bilaterally to complete a task, with max. 2 verbal prompts.

Evaluation Criteria	Evaluation Procedures	Schedule for Determining Progress	Dates Reviewed/ Extent of Progress
% Accuracy 3 / 4 # of attempts X Other (specify) per month	 Observation Log X Data Charts Tests Other (specify) 	Daily Weekly Quarterly Semester Other (specify) monthly	By April 2018.

STUDENT NAME: <u>A</u>	SS			DATE OF MEETING:	04/05/2017
	G	OALS AND OB	JECTIVES/BENCHI	MARKS	
GOAL# 2 of 11					
Current Academic Achiev	vement and Functio	nal Performance:			
Results of the initial or mo education peers and standa	ist recent evaluation a ards.	and results on district	-wide assessments relev	ant to this goal; performance in cor	nparison to general
has difficulty co	ot of challenges coo ompleting simple 1- ities in adapted PE	2 step motor move	ments which impacts	y completing this or any movem her ability to participate in many	ent. She
Goal Statement: In a therapy or data charts by		A lle a ble	to copy a 1-2 step mo	otor movement in 5/10 trials, as	noted on
ndicate Goal Area:	Academic	x Functional		Illinois Learning Standard	#
indicate Obai / incu.					
itle(s) of Goal Implement	er(s)				
itle(s) of Goal Implement		rogress on the Ar	nnual Goal		

Evaluation Criteria % Accuracy 3 / 10 # of attempts Other (specify)	Evaluation Procedures Observation Log X Data Charts Tests Other (specify)	Schedule for Determining Progress Daily Weekly Quarterly Semester X Other (specify) monthly	Dates Reviewed/ Extent of Progress June 2017
		and the second	

Short-Term Objective/Benchmark for Measuring Progress on the Annual Goal

#2 - In a therapy or classroom setting, A will be able to copy a 1-2 step motor movement in 4/10 trials, as noted on data charts by November 2017.

Evaluation Criteria Evaluation Procedures % Accuracy Observation Log % I 10 # of attempts X Data Charts Other (specify) Tests Other (specify) Other (specify)	Schedule for Determining Progress Daily Weekly Quarterly Semester X Other (specify) monthly	Dates Reviewed/ Extent of Progress November 2017
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DATE OF MEETING:

STUDENT NAME: ASSAULT STATE

_ Other (specify)

	GOALS AND OBJECTIV	ES/BENCHMARKS	
Short-Term Objective/Benchmark	for Measuring Progress on the Annual Go	al	
#3 - In a therapy or cl noted on data charts l		copy a 1-2 step motor movement in	5/10 trials, as
Evaluation Criteria	Evaluation Procedures	Schedule for Determining Progress	Dates Reviewed/ Extent of Progress
% Accuracy / 10 # of attempts	Observation Log X Data Charts	Daily	April 2018

Weekly

Quarterly
Semester
X Other (specify)

monthly

Tests
Other (specify)

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STUDENT NAME: A STUDENT STUDENT

DATE OF MEETING: 04/05/2017

GOALS AND OBJECTIVES/BENCHMARKS

GOAL# 3 of 11

Current Academic Achievement and Functional Performance:

Results of the initial or most recent evaluation and results on district-wide assessments relevant to this goal; performance in comparison to general education peers and standards.

A state of the sentence of the sentence or will find a word in the sentence and create her own sentence based on the word.

Goal Statement:

Within a year, given a book written at the preprimer level with sentences divided into two two-word phrases (ex: I see/the dog), Additional will accurately read the sentence while tapping each phrase for 60% of opportunities.

Indicate Goal Area:	x	Academic	🗌 Fu	nctional	Transition	Illinois Learning Standard #	
Title(s) of Goal Implementer							
Classroom Tead	her						

Short-Term Objective/Benchmark for Measuring Progress on the Annual Goal

#1 - By June 2017, given a book written at the preprimer level with sentences divided into two two-word phrases (ex: I see/the dog), A will accurately read the sentence while tapping each phrase for 40% of opportunities.

Evaluation Criteria <u>40</u> % Accuracy / # of attempts Other (specify)	Evaluation Procedures Observation Log X Data Charts Tests Other (specify)	Schedule for Determining Progress Daily Weekly Quarterly Semester X Other (specify)	Dates Reviewed/ Extent of Progress June 2017
		2X monthly	

Short-Term Objective/Benchmark for Measuring Progress on the Annual Goal

#2 - By November 2017, given a book written at the preprimer level with sentences divided into two-word phrases (ex: I see/the dog), A will accurately read the sentence while tapping each phrase for 50% of opportunities.

Other (specify) Tests Quart Other (specify) Seme	ekly arterly nester ner (specify) hly	
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STUDENT NAME: A

GOALS AND OBJECTIVES/BENCHMARKS Short-Term Objective/Benchmark for Measuring Progress on the Annual Goal #3 - By April 2018, given a book written at the preprimer level with sentences divided into two two-word phrases (ex: I see/the dog), A will accurately read the sentence while tapping each phrase for 60% of opportunities. **Evaluation Criteria Evaluation Procedures** Schedule for Determining Dates Reviewed/ Extent of Progress Progress 60 % Accuracy **Observation Log** April 2018 Daily # of attempts X Data Charts Weekly Other (specify) Tests Quarterly Other (specify) Semester Х Other (specify)

2X monthly

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STUDENT NAME: A		DATE OF MEE	TING:04/05/2017
	GOALS AND OBJECTIV	/ES/BENCHMARKS	
education peers and standards. Given a group of 5 obje once on average for 2 o same object and simple frozen characters), she at the number of object Goal Statement:	evaluation and results on district-wide as ects, A accurately counts the set but of 5 trials or 40% of opportunities. a, such as pattern blocks. If you give has difficulty counting the group of o s in front of her. She will continue to group of 5 objects, A will accurate n 80% of opportunities.	ssessments relevant to this goal; performa of objects while moving or tapping ea She is more successful if the up to 5 her more than one different shape or bjects. When counting, Attic has a l count on until told to stop. tely count the set of objects while mov Transition Illinois Learning	ach object only objects are the "busy" objects (ex. hard time stopping ring or tapping
#1 - By June 2017, give	For Measuring Progress on the Annual Go en a group of 3 objects, A to will active by once in 80% of opportunities. Evaluation Procedures Observation Log Observation Log Data Charts Tests Other (specify)	Schedule for Determining Progress Daily Veekly Quarterly Semester X Other (specify) 2X monthly	e moving or Dates Reviewed/ Extent of Progress June 2017
#2 - By November 201	for Measuring Progress on the Annual G 7, given a group of 4 objects, A ly once in 80% of opportunities. Evaluation Procedures Observation Log X Data Charts Tests Other (specify)	Schedule for Determining Progress Daily Weekly Quarterly Semester X< Other (specify)	s while moving or Dates Reviewed/ Extent of Progress November 2017

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STUDENT NAME:

A

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 GOALS AND OBJECTIVES/BENCHMARKS

 Short-Term Objective/Benchmark for Measuring Progress on the Annual Goal

 #3 - By April 2018, given a group of 5 objects, A
 will accurately count the set of objects while moving or tapping each object only once in 80% of opportunities.

 Evaluation Criteria
 Evaluation Procedures
 Schedule for Determining Progress
 Dates Reviewed/ Extent of Progress

04/05/2017

DATE OF MEETING:

80 % Accuracy	Observation Log	Progress	Progress
/ # of attempts	X Data Charts	Daily	April 2018
Other (specify)	Tests	Weekly	
Onici (specify)	Other (specify)	Quarterly	
	Other (specify)	Semester	
		X Other (specify)	
		2X monthly	
	I	1	1

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STUDENT NAME: A	S	DATE OF MEET	ring:04/05/2017
	GOALS AND OBJECT	IVES/BENCHMARKS	
education peers and standards. A demonstrates the With adult prompting, A Goal Statement: Within a year, A Within a year, A Classroom Teacher Short-Term Objective/Benchmark for #1 - By June 2017, A	ability to independently sequence ability to independently sequence demonstrate the ability to independent e bathroom, opening yogurt, a data cademic Functional Measuring Progress on the Annual O will demonstrate the ability to independent will demonstrate the ability to independent will demonstrate the ability to independent ability to independent abilit	ndently sequence at least 3 pictures bas ly routine) into logical order for 80% of a Transition Illinois Learning S	0% of the time. sed on a familiar opportunities. Standard # Standard and a
Evaluation Criteria <u>60</u> % Accuracy / # of attempts Other (specify) Short-Term Objective/Benchmark for #2 - By November 2017, a familiar daily task (ex. 6	As will demonstrate the ability	Schedule for Determining Progress Daily Daily Weekly Quarterly Semester Other (specify) 2X monthly Goal y to independently sequence at least 3 pourt, a daily routine) into logical order for	Dates Reviewed/ Extent of Progress June 2017 pictures based on pr 70% of
Evaluation Criteria 70 % Accuracy / # of attempts Other (specify)	Evaluation Procedures Observation Log X Data Charts Tests Other (specify)	Schedule for Determining Progress Daily Weekly Quarterly Semester _X Other (specify) 2X monthly	Dates Reviewed/ Extent of Progress November 2017

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STUDENT NAME: A

DATE OF MEETING: ____0

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GOALS AND OBJECTIVES/BENCHMARKS

Short-Term Objective/Benchmark for Measuring Progress on the Annual Goal

s

#3 - By April 2018, A**1111** will demonstrate the ability to independently sequence at least 3 pictures based on a familiar daily task (ex. going to the bathroom, opening yogurt, a daily routine) into logical order for 80% of opportunities.

Evaluation Criteria	Evaluation Procedures	Schedule for Determining	Dates Reviewed/ Extent of
80 % Accuracy / # of attempts Other (specify)	 Observation Log X Data Charts Tests Other (specify) 	Progress — Daily — Weekly — Quarterly — Semester X Other (specify) 2X monthly	Progress April 2018

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	GOALS AND OBJECTIV	ES/BENCHMARKS	
education peers and standards. A frequently offers o ability to perform listening Goal Statement: Within a year, A free will verbal exchanges and pra therapist cues in 3 out of the Indicate Goal Area: Action Speech Language Pathole	Functional Performance: aluation and results on district-wide as ff-topic comments as well as engage tasks successfully. improve her overall communication acticing strategies to facilitate her po 5 opportunities as measured by date reademic x Functional	sessments relevant to this goal; perform les in behaviors which are distracting skills by offering topic appropriate of erformance on listening tasks when a charts twice a month.	g and impede her comments during provided 3 or less
 #1 - By April 2018, A of 5 opportunities. Evaluation Criteria % Accuracy 3 / 5 # of attempts X Other (specify) number of on-topic communication exchanges in 2m 	Evaluation Procedures Observation Log X Data Charts Tests Other (specify)	exchanges within 2 minutes, with or Schedule for Determining Progress Daily Daily Quarterly Quarterly Semester X Other (specify) monthly	ne or no cues, in 3 Dates Reviewed/ Extent o Progress June 2017, November 2017, April 2018

Evaluation Criteria	Evaluation Procedures	Schedule for Determining Progress	Dates Reviewed/ Extent of Progress
 % Accuracy 3 / 5 # of attempts X Other (specify) Number of cues needed. 	Observation Log X Data Charts Tests Other (specify)	 Daily Weekly Quarterly Semester Other (specify) twice a month 	June 2017, November 2017, April 2018

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STUDENT NAME: A		DATE OF ME	ETING: 04/05/2017
	GOALS AND OBJECTIV	ES/BENCHMARKS	
education peers and standards. A transferred struggles to use formulating sentences w fragments or 3-4 word s Goal Statement: By April 2018, A transferred w size, color) including a p in 4 of 5 opportunities a Indicate Goal Area: Title(s) of Goal Implementer(s) SPL, Teacher, Support Short-Term Objective/Benchmark for #1 - By June 2017, A	ad Functional Performance: evaluation and results on district-wide as language that includes adjectives an which are 9 or more words in length. imple constructions. ill expand expressive language skills prepositional phrase (location) about as measured by monthly data charts. Academic x Functional 1 staff, IAs or Measuring Progress on the Annual Go invill expand expressive language a given picture with a visual support a	sessments relevant to this goal; perform d prepositional phrases. Although s The majority of her productions are by providing a sentence containing a given picture with a visual support Fransition Illinois Learning al skills by providing a sentence contai	the is capable of either sentence 2 attributes (e.g. and 1 adult prompt 3 Standard #
Evaluation Criteria % Accuracy 4 / 5 # of attempts Other (specify)	Evaluation Procedures Observation Log X Data Charts Tests Other (specify)	Schedule for Determining Progress Daily Weekly Quarterly Semester Other (specify) Monthly	Dates Reviewed/ Extent o Progress June 2017
#2 - By November 2017	or Measuring Progress on the Annual Go 7, A will expand expressive lang or) about a given picture with a visual lata charts. Evaluation Procedures Observation Log X Data Charts Tests Other (specify)	uage skills by providing a sentence	containing 2 5 opportunities as Dates Reviewed/ Extent of Progress November 2017

Monthly

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STUDENT NAME:

A

DATE OF MEETING:

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GOALS AND OBJECTIVES/BENCHMARKS

Short-Term Objective/Benchmark for Measuring Progress on the Annual Goal

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#3 - By April 2018, Applie will expand expressive language skills by providing a sentence containing 2 attributes (e.g. size, color) including a prepositional phrase (e.g. location) about a given picture with a visual support and 1 adult prompt in 4 of 5 opportunities as measured by monthly data charts.

Evaluation Criteria	Evaluation Procedures	Schedule for Determining	Dates Reviewed/ Extent of
 % Accuracy 4 / 5 # of attempts X Other (specify) number attributes used/use of prepositional phrase 	 Observation Log X Data Charts Tests Other (specify) 	Progress Daily Weekly Quarterly Semester Other (specify) Monthly	Progress April 2018

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GOALS AND OBJECTIVES/BENCHMARKS

GOAL# 8 of 11

Current Academic Achievement and Functional Performance:

State

Results of the initial or most recent evaluation and results on district-wide assessments relevant to this goal; performance in comparison to general education peers and standards.

Active currently presents as having extremely limited interest in interacting with peers. She has been observed to possess appropriate peer interaction skill and knowledge when she desired to play with a specific object of high interest that another peer possessed. She was able to ask the peer if she would like to play, ask if she can take a turn, asked the peer if she would like a turn, using appropriate voice and tone. However, this was only observed once and seemed focused more on the play object rather than the peer interaction.

Goal Statement:

Within one year during a preferred activity (e.g. dog therapy, using doctor supplies), Ashley will engage in a social interaction with a peer with at least 3 communication exchanges as measured through observational logs and in 4/5 occurrences.

Indicate Goal Area:	Academic	x Functional	Transition	Illinois Learning Standard #
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Title(s) of Goal Implementer(s)

Classroom teacher, Support Staff, IAs, School Psychologist

Short-Term Objective/Benchmark for Measuring Progress on the Annual Goal

#1 - By June, 2017 and during a preferred activity, A**gentic** will socially engage a peer by engaging in at least social interaction using 2 communication exchanges in 2/5 opportunities.

Evaluation Criteria	Evaluation Procedures	Schedule for Determining	Dates Reviewed/ Extent of
% Accuracy 2 / 5 # of attempts Other (specify)	X Observation Log Data Charts Tests Other (specify)	Progress Daily Daily Weekly Quarterly Semester X Other (specify) Every other week	Progress 6/17

Short-Term Objective/Benchmark for Measuring Progress on the Annual Goal

#2 - By November 2017 and given a preferred activity A will socially engage a peer by demonstrating 2 communication exchanges in 3/5 opportunities.

<u>%</u> Accuracy <u>X</u> Observation Log	Progress Daily	Progress
3 / 5 # of attempts Other (specify) Tests Other (specify) Other (specify) X Even	Weekly Quarterly Semester Other (specify) ry other week	11/17

DATE OF MEETING: 04/05/2017

STUDENT NAME: A STORE STORE

DATE OF MEETING:

04/05/2017

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Short-Term Objective/Benchmark for Measuring Progress on the Annual Goal

#3 - By April 2018 and given a preferred activity A will socially engage a peer by demonstrating 3 communication exchanges in 4/5 opportunities

Evaluation Criteria	Evaluation Procedures	Schedule for Determining Progress	Dates Reviewed/ Extent of Progress
<pre> % Accuracy / 5 # of attempts Other (specify)</pre>	X Observation Log Data Charts Tests Other (specify)	Daily Daily Weekly Quarterly Semester X Other (specify) Every other week	4/2018

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STUDENT NAME: A		DATE OF ME	ETING: 04/05/2017
	GOALS AND OBJECTIV	ES/BENCHMARKS	
GOAL# 9 of 11			
Current Academic Achievement and Results of the initial or most recent ev education peers and standards.		sessments relevant to this goal; perform	ance in comparison to general
She can identify all letters 34/40 preprimer words an	in the alphabet and is reading pre- d 12/40 primer words	primer dolch words. She is currently	reading/identifying
Goal Statement:			
By April 2018, when prese 4 trials.	ented with primer dolch word flashc	ards, A nter 1 will read 36 primer dolo	h words, in 3 out of
Indicate Goal Area: X Ad	cademic 🗍 Functional 🔲 T	ransition Illinois Learning	Standard #
Title(s) of Goal Implementer(s) Classroom Teacher			
·	Measuring Progress on the Annual Gos presented with primer dolch word fl Evaluation Procedures	ashcards, Agent will read 20 prime	r dolch words, in 3 Dates Reviewed/ Extent o
<pre>% Accuracy 3 / 4 # of attempts Other (specify)</pre>	 Observation Log X Data Charts Tests Other (specify) 	Progress Daily Weekly Quarterly Semester Other (specify) 2X monthly	Progress June 2017
	Measuring Progress on the Annual Go when presented with primer dolch v	al vord flashcards, A nne will read 28	primer dolch words,
Evaluation Criteria	Evaluation Procedures	Schedule for Determining Progress	Dates Reviewed/ Extent o Progress
— % Accuracy 3 / 4 # of attempts Other (specify)	Observation Log X Data Charts Tests	Daily Weekly Quarterly	November 2017

X Other (specify)

2X monthly

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STUDENT NAME: A STUDENT SERVICE

DATE OF MEETING: 04/05/2017

	GOALS AND OBJECTIV	/ES/BENCHMARKS	
Short-Term Objective/Benchmark	for Measuring Progress on the Annual Go	bal	······
#3 - By April 2018, whe out of 4 trials.	en presented with primer dolch word f	lashcards, A ttern will read 36 prime	er dolch words, in 3
Evaluation Criteria % Accuracy 3 / 4 # of attempts Other (specify)	Evaluation Procedures Observation Log Data Charts Tests Other (specify)	Schedule for Determining Progress Daily Weekly Quarterly	Dates Reviewed/ Extent of Progress April 2018
		Semester Other (specify)	

2X monthly

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STUDENT NAME: A	Sam	DATE OF MEE	CTING: 04/05/2017
	GOALS AND OBJECTIVI	ES/BENCHMARKS	
Goal Statement: Within one year, A observational logs. Indicate Goal Area: Ac Title(s) of Goal Implementer(s) Classroom teacher, IAs, S Short-Term Objective/Benchmark for I	Iluation and results on district-wide assemultiple Individual prompts to follow Ill follow two step directions with a v ademic x Functional Tr upport Staff Measuring Progress on the Annual Goa	one step directions. isual cue 80% of the time as measu ansition Illinois Learning	ured by Standard #
•	Measuring Progress on the Annual Goa Weasuring Progress on the Annual Goa Weasure of the Annual Goa Measure of the Annual Goa	Semester Other (specify) 	ties. Dates Reviewed/ Extent of Progress 11/17 4/18

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STUDENT NAME: A State State

DATE OF MEETING:

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GOALS AND OBJECTIVES/BENCHMARKS

Short-Term Objective/Benchmark for Measuring Progress on the Annual Goal

#3 - By April 2018, April will follow 2 step directions with a visual cue in 80% of opportunities

Evaluation Criteria	Evaluation Procedures	Schedule for Determining Progress	Dates Reviewed/ Extent of Progress
80 % Accuracy / # of attempts Other (specify)	X Observation Log Data Charts Tests Other (specify)	 Daily X Weekly Quarterly Semester Other (specify) 	4/2018

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GOALS AND OBJECTIVES/BENCHMARKS

GOAL# 11 of 11

Current Academic Achievement and Functional Performance:

Results of the initial or most recent evaluation and results on district-wide assessments relevant to this goal; performance in comparison to general education peers and standards.

Automits understanding of basic concepts has been assessed to be severely low. Upon administration of the Boehm Test of Basic Concepts-3, Form F, Automit was able to correctly identify the following 10 concepts out of 50 presented: center, always, right, corner, every, over, next, other, most, different.

She was unable to correctly identify the following 40 concepts :

Spatial:top, side, last, end, farthest, through, behind, below,
away, left, between, forward, backward, alike, skip
Quantitative:above, separated, row, bottom, front,
above, separated, row, bottom, front,
half, fewest, as many, third, pair, least,
equal
Temporal :Defore, never, beginning, starting

Miscellaneous: match

Goal Statement:

By April 2018, A terms will demonstrate comprehension of a total of 40 basic concept terms with 75% accuracy given one therapist cue as measured by data charts twice a month.

Indicate Goal Area:	x Academic	Functional	Transition	Illinois Learning Standard #
Title(s) of Goal Implement	nter(s)			

SLF

Short-Term Objective/Benchmark for Measuring Progress on the Annual Goal

#1 - By June of 2017, A will demonstrate comprehension of 13 of 40 basic concept terms with 75% accuracy, when given 1 therapist cue, as measured by data charts twice a month.

Evaluation Criteria	Evaluation Procedures	Schedule for Determining	Dates Reviewed/ Extent of Progress
75 % Accuracy / # of attempts Other (specify)	 Observation Log X Data Charts Tests Other (specify) 	Progress Daily Daily Weekly Quarterly Semester X Other (specify) twice a month	Progress June 2017

Short-Term Objective/Benchmark for Measuring Progress on the Annual Goal

#2 - By November of 2017, A total 40, with 75% accuracy, when given 1 therapist cue, as measured by data charts twice a month.

Evaluation Criteria 75 % Accuracy / # of attempts Other (specify)	Evaluation Procedures Observation Log X Data Charts Tests Other (specify)	Schedule for Determining Progress Daily Weekly Quarterly Semester X Other (specify) twice a month	Dates Reviewed/ Extent of Progress November 2017
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STUDENT NAME: A

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DATE OF MEETING: 04/05/2017

GOALS A	ND OBJECT	IVES/BEN	NCHMARKS

Short-Term Objective/Benchmark for Measuring Progress on the Annual Goal

#3 - By April 2018, A will demonstrate comprehension of 40 basic concept terms with 75% accuracy, when given 1 therapist cue, as measured by data charts twice a month.

Evaluation Criteria 75 % Accuracy	Evaluation Procedures	Schedule for Determining	Dates Reviewed/ Extent of
	Observation Log	Progress	Progress
/ # of attempts Other (specify)	X Data Charts Tests Other (specify)	Daily Weekly Quarterly Semester X Other (specify) twice a month	April 2018

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STUDENT	NAME:
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A

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DATE OF MEETING: 04/05/2017

EDUCATIONAL ACCOMMODATIONS AND SUPPORTS Complete for initial IEPs and annual reviews. (<i>Anyone responsible for implementing the educat</i> accommodations must be notified of her/his specific responsibilities).	tional
TRANSITION	
Yes No X NA Consideration of service needs, goals, and support/services is required (by age 14 ¹ / ₂ , the team service needs). If yes, complete the "Transition Services" section of the IEP.	must address transition
Yes No X NA Consideration of "Home-Based Support Services Program for Mentally Disabled Adults" for student is required. If yes, complete the "Home-Based Support Services Program" section	eighteen-year-old on of the IEP.
CONSIDERATION OF SPECIAL FACTORS	
Check the boxes to indicate if the student requires any supplementary aids and/or services due to the following factors. For a "yes," specify the special factors in the "Supplementary Aids, Accommodations and Modifications" section and/or the Cultural Accommodations section listed below.	iny box checked e Linguistic and
X Yes No assistive technology devices and services	
X Yes No communication needs including students who are deaf/hard of hearing. If yes, complete linguistic accommodations section below.	ic and cultural
Yes X No limited English proficiency - language needs	
Yes X No blind/visually impaired - provision of Braille instruction	
Yes X No behavior impedes student's learning or that of others. If yes, the team must consider strategies, in behavioral interventions and supports to address behavior. This may include a Functional Beh and/or a Behavioral Intervention Plan. If so, attach any completed forms.	ncluding positive avioral Assessment
LINGUISTIC AND CULTURAL ACCOMMODATIONS	
Yes X No The student requires accommodations for the IEP to meet her/his linguistic and cultural needs. The who are deaf/hard of hearing. If yes, specify any needed accommodations:	This includes students
Yes X No Special education and related services will be provided in a language or mode of communication addition to English. This includes services provided to students who are deaf/hard of hearing. If yes, specify any needed accommodations:	n other than or in
For students who are deaf/hard of hearing and others, as applicable:	_
Identify the language and communication need(s): Signed English Other (please describe)	enerated Device Tactile
• List the opportunities for direct communication/interaction with peers and professional personnel in the child's languag mode:	e and communication;

• List the identified mode of communication accessible in academic instruction, school services, and extracurricular activities that the student will receive:

SUPPLEMENTARY AIDS, ACCOMMODATIONS, AND MODIFICATIONS

Specify what aids, accommodations, and modifications are needed for the child to make progress toward annual goals, to progress in the general education curriculum, participate in extracurricular and other non-academic activities, and to be educated and participate with other children with disabilities and/or nondisabled children (e.g., accommodations for daily work, environmental accommodations, moving from class to class, etc.). Supplementary aids, accommodations, and modifications must be based upon peer-review research to the extent practicable.

Supplementary Aids

Desk Corral for desk work, small class size, individual instructional assistant for safety due to seizure activity, chair with arms for safety due to seizures, visual supports, access to manipulatives, access to keyboarding practice, use of tools to assist with handwriting baseline, use of social thinking curriculum supports, access to sensory tools as needed.

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STUDENT NAME:

DATE OF MEETING: 04/05/2017

SUPPLEMENTARY AIDS, ACCOMMODATIONS, AND MODIFICATIONS

Accommodations

Access to assistive technology, preferential seating, regular breaks,

See

A

Modifications

Limit supplies/tasks to only what she needs for that particular activity. Modified curriculum, slowed pacing of instruction, repeated directions, regular breaks

SUPPORTS FOR SCHOOL PERSONNEL

Program trainings and/or supports for school personnel are needed for the student to advance appropriately toward attaining the annual goals, participate in the general curriculum, and be educated and participate with other students in educational activities. If yes, specify what trainings and/or supports are needed, including when appropriate, the information that clarifies when the trainings and/or supports will be provided, by whom, in what location, etc.



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STUDENT NAME: A

04/05/2017 DATE OF MEETING:

ACCECCMENT

	ASSESSMENT
na an a	CLASSROOM-BASED ASSESSMENTS
	Student will participate in classroom assessments with no accommodation(s).
X	Student will participate in classroom assessments with accommodation(s). (Complete Assessment Accommodations section on the IEP.)
	DISTRICT-WIDE ASSESSMENTS
	District does not administer district-wide assessments
Student wi	District does not administer district-wide assessments at this grade level:
	Participate in the entire district-wide assessment without accommodation(s).
	Participate in the entire district-wide assessment with accommodation(s). (Complete Assessment Accommodations section on the IEP.)
	Participate in part(s) of the district-wide assessment (specify which part(s) and what, if any, accommodations are required). (Complete Assessment Accommodations section on the IEP.)
	Participate in the district-wide alternate assessment without accommodation(s).
×	Participate in the district-wide alternate assessment with accommodation(s). (Complete Assessment Accommodations section on the IEP.)
	STATE ACADEMIC ASSESSMENTS
Indicate below needed.	which state academic assessment(s) this student will take and, if applicable, if accessibility feature(s) and/or accommodation(s) are
1. <u>Partnership</u> PARCC is pro currently enro the English L	academic assessments are not administered at this grade level: <u>or Assessment of Readiness for College and Careers (PARCC) (grades 3-8. and high school)</u> wided for English Language Arts/Literacy and Mathematics at grades 3-8 and high school. For high school administration, a student lied in Integrated Math 3 or Algebra 2 will take the mathematics assessment and a student currently enrolled in English 3 will take anguage Arts assessment. ARCC assessment is not appropriate. (Go to #2)
Partic	ipate in PARCC with no accessibility features turned on in advance and no accommodation(s).
Acces	ipate in PARCC assessment with accessibility features turned on in advance and/or accommodation(s). (Complete the PARCC sibility Features and Accommodations form and attach).
	rning Maps (DLM) (Alternate assessment for grades 3-8, and 11)
	DLM Participation Guidelines were met. (Complete the DLM Participation Guidelines and attach.)
If met, the st	ipate in DLM with no accessibility features/accommodation(s).
X Partic	ripate in DLM with accessibility features/accommodation(s). (Complete the DLM Accessibility Features and Accommodations form ttach)
3. Illinois Scien	<u>ce Assessment</u>
x Not a	dministered at student's current grade level.
Partie	ipate in science assessment with no accommodation(s).
	sipate in science assessment with accommodation(s). (Complete Assessment Accommodations section of the IEP)
	nal by district). If applicable, list assessment to be given (e.g. KIDS)
x Parti	sipate in Brockport Fitness
Partie	sipate with no accommodation(s).
X Parti	cipate with accommodation(s). (Complete Assessment Accommodations section on the IEP)
	STATE ASSESSMENT OF LANGUAGE PROFICIENCY
The State areas	sment of language proficiency Assessing Comprehension and Communication in English State to State (ACCESS) and the Alternate

The State assessment of language proficiency Assessing C for English Access Learners (EL) in grades K-12 include: mmunication in English State to State (ACCESS) and the Alternate a. 1.18-cv-00181 Docum ont #. 1_1 Eiled: 01/10/18 Dage 37 of 12 Dage #./18

	Case.	1.18-00-0	10181 Document #. 1-	·1 Filed. 01/10/18 Pa	ge 37 01 43 Pagell	J #.48
STUDEN	T NAME:	A			DATE OF MEETING:	04/05/2017
	🗌 Yes	x No	ENGLISH LEARNER (EL)	. If "NO", skip to next section		
If yes, tl	he student v	will:				
	Participate i	n the ACCESS	S with no accommodations			
	Participate i	n the ACCESS	S with accommodations (Comple	ete Assessment Accommodation	ns section of the IEP.)	
	Participate i	n the alternate	ACCESS with no accommodati	on(s).		
	Participate i	n the alternate	ACCESS with accommodation	s). (Complete Assessment Acco	ommodations section of the	IEP).
		a, tes, d	ASSESSMEN	ACCOMMODATIONS		
the conten		the section be	essments with accommodations low.	, other than PARCC and DLM	, document any needed acc	ommodations fo
			man read aloud, teacher enter reaks and movement, 1:1 test		e supports, visual support	s, scribe,
District-Ba	ased Assess	ments				
			man read aloud, teacher enter reaks and movement, alterna			
Science A	ssessment					
Other Ass	essment (e.g	g., KIDS)				
	t Fitness-	lividual instru	ctional assistant for safety du	e to seizure activity, visual si	inports repeated direction	ns/tasks_slow

due to seizure activity, visual supports, repeated directions/tasks, slowed small class size, individual instructional assistant for pace of instruction.

ACCESS/Alternate ACCESS

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STUDENT NAME:

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DATE OF MEETING: 04/05/2017

The IEP must address all content areas, classes, and specif	fy if the student will parti	cipate in general physical edu	cation.
General Education with No Supplementary Aids (Specify content areas, classes, whether or not the child will participate in general physical education, and extracurricular and other nonacademic activities.)	Initiation Date	Duration Date	Minutes in Setting (Optional)
General Education with Supplementary Aids (as specified in the Supplementary Aids section) Specify content areas, classes, whether or not the child will participate in general physical education, and extracurricular and other nonacademic activities with supports, if applicable.)	Initiation Date	Duration Date	Minutes in Setting (Optional)
Adapted PE	04/06/2017	04/05/2018	week
Special Education and Related Services within the General Education Classroom (Specify content areas and classes in which the child will participate with the provision of special education and related services. List each special education and related service that will be provided during each class.)	Initiation Date	Duration Date	Minutes in Setting

PARTICIPATION IN SPECIAL EDUCATION CLASSES/SERVICES						
The IEP must address all special education and related services.						
Special Education Services - Outside General Education	Initiation Date	Duration Date	Minutes in Setting			
Special Education Services	04/06/2017	04/05/2018	1435.0 per week			
Related Services - Outside General Education	Initiation Date	Duration Date	Minutes in Setting			
Occupational Therapy	04/06/2017	04/05/2018	40.0 per week			
Physical Therapy	04/06/2017	04/05/2018	40.0 per week			
Transportation	04/06/2017	04/05/2018	150.0 per week			
Psychological Services	04/06/2017	04/05/2018	45.0 per week			
Speech/Language Services	04/06/2017	04/05/2018	110.0 per week			

Educational Environment (EE) Calculation (Ages 3-5)	Educational Environment (EE) Calculation (Ages 6-21)			
1. Minutes spent in regular early childhood program	1895 1. Total Bell to Bell Minutes			
2. Minutes spent receiving special education and related services outside regular early childhood (A+B)	1895 2. Total Number of Minutes Outside of the General Education Setting (A+B)			
	0 3. Total Number of Minutes inside the General Education Setting (line #1 minus line #2)			
	0 4. Percentage of time inside the General Education Environment (line #3 divided by line #1)			

EDUCATIONAL SERVICES AND PLACEMENT

EDUCATIONAL ENVIRONMENT CONSIDERATIONS

To the maximum extent appropriate, all students shall be educated and participate with students who are non-disabled. Provide an explanation of the extent, if any, to which the student will not participate in general education classes and activities.

X Yes 🗌 No

Special education classes, separate schooling, or removal from the regular education environment is required because the nature or severity of the student's disability is such that education in general classes with the use of supplementary aids and services cannot be achieved satisfactorily.

Explain:

Due to the level of A to the level of A to the state of t

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STUDENT NAME: /			DATE OF MEETING:	04/05/2017
X Yes	🗌 No	Will participate in nonacademic activities with nondisabled pee extracurricular activities as nondisabled peers?	ers and have the same opportunity t	o participate in
		If no, explain:		
🗌 Yes	X No	Will attend the school he or she would attend if nondisabled? If no, explain:		
		A state of the second does not have a program that would needs at this time.	Id adequately meet her academ	c or behavioral
		PLACEMENT CONSIDERATION	NS (

When determining the placement, consider any <u>potentially harmful effect</u> either on the student or the quality of services that he/she needs. After determining the student's placement, complete the "<u>Placement</u>" section on this cover sheet.

Yes 🗍

NA x For a child who is deaf, hard of hearing, blind or visually impaired, parents have been informed of existence of the Illinois School for the Deaf or the Illinois School for the Visually Impaired, and other local schools that provide similar services.

PLACEMENT OPTIONS CONSIDERED	POTENTIALLY HARMFUL EFFECT/REASONS REJECTED	TEAM ACCEPTS PLACEMENT			
Resource	Ashley would not be able to get enough support in a resource setting. She requires a drastically modified curriculum.	Yes X No			
Consultation	Ashley would receive too little support in a consultative setting. She requires individualized instruction at her level.	Yes X No			
Instructional (ID)	Ashley would have limited interaction with typically developing peers. This will be addressed through integration opportunities as appropriate.	X Yes 🗌 No			

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STUDENT NAME:		A DATE OF MEETING: 04/05/2017						
		TRANSPORTATION						
Check all the	at apply							
Yes 🛛	No 🗌	Special transportation is required to and from schools and/or between schools.						
Yes 🗌	No 🗴	Special transportation is required in and around school buildings.						
Yes 🗌	No 🗴	Specialized equipment (such as special or adapted buses, lifts, and ramps) is required.						

Please explain and/or detail transportation plan:

	at Qu	EXTENDED SCHOOL YEAR SERVICES
Yes X	No 🗌	Extended school year services are needed. The IEP team must document the consideration of the need for extended school year services and the basis for the determination.
		As would benefit from ESY services to limit recoupment time in the fall and decrease skill loss over the summer.

If yes, the IEP must indicate the type, amount and duration of services to be provided.

SPECIAL EDUCATION LO	LOCATION	AMOUNT/FREQUENCY OF SERVICES	INITIATION OF SERVICES	DURATION OF SERVICES	GOAL(S) ADDRESSED
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STUDENT NAME:

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DATE OF MEETING: 04/05/2017

ADDITIONAL NOTES/INFORMATION

This is Attended annual review and three year eligibility meeting. Dr. Getz, Rocco - behavioral therapist, and another clinician, who works with Dr. Getz attended the meeting. Both of Attended s parents are present.

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Ms. Masters presented regarding A behavior during LMC time. She notes difficulty facing the group and being engaged by the activity. Frequent redirection is required as noted per observations. Mr. and Mrs. Here noted that using a bell sound to mark transitions seems to work well for her.

Ms. Konicki presented results of her teacher version of the Vineland. Several relative strengths were noted within each area. Her use of expressive language, coping skills, and Interpersonal relationships were areas of relative strengths within each sub domain.

Ms. Joyce presented results of the OT evaluation. A state is noted to have difficulty with visual tracking and focusing her eyes on a target. Parents inquired about vision therapy being available within the school environment. Ms. Gordon, director of special education, noted that developmental optometry therapy is not available in the district as part of A s plan while noting that students who meet the visual impairment criteria do receive vision services as part of their plan. Ms. Joyce discussed American performance on writing letters of her name. Ms. Borgetti pointed out that if Ame is asked to repeat the direction given she is more likely to follow the direction. Ms. noted hand over hand trials in the beginning makes her more successful on independent trials. Inattention and her vision working together with motor planning seems to be a challenge for her. Ms. Joyce noted that reading/looking from left to right is a challenge for her. She tends to start in the middle of the line and move right. Overall visual-motor integration skill fell at the mid to ending 2 year old level currently. Both parents noted that progress is rs visual motor skill at home and school. Dr. Getz described how the VMI is a good measure to being seen in A demonstrate growth over the years via the raw score and age-equivalents. Mr. part of OT's domain or more a part of academic domains. Ms. Joyce notes that she does work on sequencing activities. Ms. Borgetti noted she has written a goal for this as well. She noted Again is easily distracted by sights and sounds in the environment. She is also sensitive to having her hand touched. Improvement in this area has inquired if we use touch screen or mouse controlled technology. Ms. Borgetti been noted by the OT. Ms. noted that both are used. Difficulty with bilateral coordination was noted. Ms. Joyce noted that she will continue to work on these skills but the formal goal will continue to work on her writing her first name correctly. Ms. noted that repetition of her first name in a variety of ways is essential for America Repetition of this will be worked in throughout the day.

Ms. Set noted observed improvement in A shifty to open things and use scissors.

Ms. Bellefontaine, physical therapist, presented the results of her PT evaluation. Motor coordination is an area seen as a concern which impact her walking safely. A has an adult walking with her at all times. Ms. Bellefontaine presented evaluation results while noting some of these tests are standardized comparing her to a 10 year old while others were more skill based assessments. It was noted that the need for 1:1 assistance for safety reasons lowered her score a touch but the functional skills are there. It is suspected that signals are not crossing in her brain correctly to coordinate motor movements. The more verbal commands given to her the harder it is to follow directions per Ms. Bellefontaine's report.

Dr. Getz inquired with parent regarding a vision therapy eval. that was reported to be completed privately. She suggests that if there was a report given it would be helpful for the school to have a copy. Ms. Gordon clarified the difference between the two places Ms. State brought A

Ms. S would like it boldly noted that she is invested in the school providing assistance with A bold is visual coordination and visual-motor coordination. The school noted that they will work on these skills throughout her educational program.

Mr. Set inquired about the observed regression in her motor skills compared to four years ago. Her seizure activity is believed to have some impact on her functioning given the observation that as seizures increase her skills have decreased. Direct causal relationships are a question at this time.

Ms. Barnas, school nurse, presented the updated Health evaluation. Dr. Getz inquired as to the bathroom related issues being a trigger of seizures and whether or not a vasovagal response has been investigated. Ms. Barnas noted she has questioned this herself. Ms. Stated that she has asked this of professionals but this possibility has not been addressed by those people. Ms. Stated the possibility of inserting a magnet to help control seizure activity (VNS).

Ms. Smith, speech and language therapist, began to present her evaluation but needed to stop mid-way to allow the teacher to go first so that she could return to her classroom for lunch. Ms. Gordon covered Ms. Borgetti's classroom in the interim.

Ms. Borgetti, classroom teacher, presented present levels. Ms. Borgetti noted that tracking words from left to right

STUDENT NAME:

A

DATE OF MEETING: 04/05/2017

is a challenge. Ms. Surin inquired regarding utilizing motor movements into her literacy activities is being utilized. Ms. Borgetti stated that she does do this within the activity to assist her. Ms. Borgetti noted that she seems to have regressed in her sequencing skill from the beginning of the year. Ms. Surgetti stated using a visual sequencing picture cue to help lead her through steps for daily activities. Ms. Borgetti stated she too will integrate these visual sequence picture cues into Attracts day. Ms. Borgetti noted that the FABP is being discontinued due to the significant improvement in Attracts behavior within the school setting.

Ms. Borgetti covered her goals. Dr. Getz inquired if TEACCH tasks have been utilized. Ms. Gordon noted that these type of work tasks are used within the autism program and suggested Ms. Borgetti work with April Levy to work these strategies into the classroom. Dr. Getz would like to see some work-task goals integrated into the IEP. Ms. Gordon stated that she will have April Levy consult with Ms. Borgetti to establish baselines and target areas that April can work on. Goals will be added to the IEP after consultation between Rocco, the consultant and the teacher.

Suggestions were made by Rocco which include:

Use of structured tasks (using TEACCH).

- Work left to right

- items/activities would be put on one side (up to 3 or 4)

S

- She would grab from left, complete the task, and put it in the "All done" bin/section on the right side.

For dot to dot (e.g. drawing a line from dot to dot):

- Use sticky tack where she needs to end and as a border where she needs to stay in.
- Start with sticky tack, then, as she does better slowly fade/remove sticky tack.

For general activities:

- Use star chart to show how many tasks she has to do (speech, OT, work, PT)
- Vary between 1 and 10 stars/tasks.
- When she completes task have her take off the star (maybe use shopkins/Elsa stars)
- When she completes work she gets a reward (e.g. praise & break/food/etc.)

Dr. Getz would like the Dolce word lists sent home and a Dolce word increase goal added to the IEP starting with a baseline and a target dolce word goal. Dr. Getz suggested pairing decoding with encoding in phonics instruction. Ms. Borgetti is encouraged to consult with the private reading tutor to exchange information, compare data, and target the same skills in the same way.

Ms. Smith continued with her evaluation results. She too noted Applies significant difficulties with attention. Suggestions were made as to how to improve attention and length of response. Ms. Smith noted difficulty transitioning from one topic or activity to another because she tends to perseverate on the previous task or activity. Ms. Smith noted some of the silly behaviors she exhibits and how these behaviors distract her and others from the task at hand.

Dr. Getz recommends that an expressive language goal be addressed. Ms. Smith noted that expressive language is being addressed in the written goal in the plan. Dr. Getz noted that the goal written doesn't seem "measurable" to her. Rocco suggested using either a time sampling of on-topic statements. For example, A will use two on-topic communication exchanges within 2 minutes with one or no cues. For the basic concepts objective - she will master 50 out of 50 concepts by the end of the year. She currently has 10. Progress will be determined by number of concepts mastered at each trimester. For the 2nd objective of goal six - it will read three or less therapist cues and four cues will be considered a non-response while also tracking the number of cues needed. Dr. Getz would like a specific expressive language goal added and suggests using an Expanded Expressive Language tool that shows an increased sentence length and complexity using a targeted vocabulary. Dr. Getz also recommends an increase in SPL minutes from 90 to 120 based on the matrix.

Ms. Sum stressed the importance of having a visual schedule for all of her daily activities to decrease her anxiety. Ms. Sum noted that less is more in terms of verbal conversations with A stress.

Dr. Getz presented the question of whether or not A meets the autism criteria and if this needs to be added to his IEP as a disability area. The question was posed if in the future would this change programming/services in any way. The Hanover school psychologist noted that she sees why autism would be questioned given A meets presentation. Outside evaluations have noted she presents with AUTISM FEATURES and ADHD. It was noted that she seems to have features but may not fit formal autism criteria. The Hanover school psychologist agreed that she may not fit full autism criteria but does show autism features. The presence of autism will be further considered in the future. The Hanover school psychologist noted that the disability does not drive services or programs in this district. The student's needs are addressed within the IEP plan for all students. If the student is presenting with autism features these needs will be addressed regardless of the disability identified.

STUDENT NAME: A: DATE OF MEETING: 04/05/2017

Center for Disease Prevention and Reversal Toni Bark, M.D. 1220 Michigan Avenue Evanston, IL 60202 847-869-7740 Fax: 847-869-7190 disease-reversal.com

January 8, 2018

RE: Surin, Ashley DOB: 03/29/2006

To Whom it May Concern:

Ashley Surin suffers from multiple seizure disorders which are only controlled by the use of medical cannabis. The medical cannabis must be given multiple times throughout the day in order to effectively manage her seizure disorders as we are weaning her off the medicines which were interfering with her learning abilities.

Should you have any questions or concerns regarding this matter, please do not hesitate to contact the office.

and mid

Toni Bark, M.D.

Steve Glink

From: Sent: To: Subject: Maureen <JSMOLIVE@sbcglobal.net> Thursday, December 28, 2017 1:35 PM linda@educationrights.com Fwd: Follow-up

Correspondence with superintendents office I think I have one more email too Sent from my iPhone

Begin forwarded message:

From: toni bark <<u>tonibark@me.com</u>> Date: December 31, 2016 at 6:02:51 PM CST To: Maureen <<u>JSMOLIVE@sbcglobal.net</u>> Subject: Re: Follow-up

they will not agree you can try hiring a lawyer and filing with ACLU but short of legal attempts, they won't budge Toni Bark MD MHEM LEED AP

On Dec 20, 2017, at 4:03 PM, Maureen <<u>JSMOLIVE@sbcglobal.net</u>> wrote:

Worth fighting for still right?

Sent from my iPhone

On Dec 20, 2017, at 3:02 PM, toni bark <tonibark@me.com> wrote:

What I thought

Sent from my iPhone

On Dec 20, 2017, at 2:35 PM, Maureen <<u>JSMOLIVE@sbcglobal.net</u>> wrote:

Sent from my iPhone

Begin forwarded message:

From: "Myers, Nicholas" <<u>NicholasMyers@sd54.k12.il.us</u>> Date: December 20, 2017 at 2:13:10 PM CST To: "JSMOLIVE@sbcglobal.net" <JSMOLIVE@sbcglobal.net> Subject: Follow-up

Dear Ms. Surin,

Case: 1:18-cv-00181 Document #: 1-3 Filed: 01/10/18 Page 2 of 3 PageID #:57

Thank you for taking time to speak with me earlier today about your request that the District allow the use or administration of medical cannabis for your daughter, Ashley, on school property. You also provided me with a letter dated December 18, 2017, from Toni Bark, M.D.

As a written follow-up to our conversation, District 54 is not able to accommodate your request. Both the Illinois State Board of Education and the Board of Education's legal counsel have advised that while Illinois does allow some legal use of marijuana under the Compassionate Use of Medical Cannabis Pilot Program Act, 410 ILCS 130/1 et seq., the law specifically prohibits the possession and use of cannabis on the grounds of any primary or secondary school or on a school bus. I did research your question regarding marijuana oil/products that do not contain THC and any derivative of marijuana is prohibited as well. Neither District employees nor students can possess, use, administer, or facilitate the use of cannabis on school property. There is a special 'caregiving card' that an individual must possess in order to administer cannabis to a minor child. The law also prohibits the use of cannabis in a public place where an individual could reasonably be expected to be observed by others. Public place is defined to include all buildings owned or leased by a unit of local government, which would include a School District. Finally, the law prohibits the use of cannabis knowingly in close physical proximity to anyone under the age of 18 years old.

The ISBE contact person whom we spoke with about your request is Jessica Gerdes. She can be reached at 312-814-5560 or<u>jgerdes@isbe.net</u> if you have any follow up questions or concerns that she can help address. Jessica provided us with the following links to the legal statute related to this issue and supporting information – you may wish to review these links with your advocate.

http://www.ilga.gov/legislation/ilcs/ilcs3.asp?ActID=35 03&ChapterID=35

https://www.isbe.net/Pages/School-Health-Issues.aspx

If you have any questions – please feel free to give me a call at your convenience.

Best-

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Nick Myers

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Nicholas J. Myers, Ed.D. Associate Superintendent Schaumburg School District 54 847.357.5092 STATE OF ILLINOIS)) COUNTY OF COOK)

VERIFICATION

We, J.S. and M.S., having been duly sworn on oath, and subject to the penalties of perjury provided by law, do solemnly swear or affirm that we have read the Verified Complaint and Emergency Motion for a Temporary Restraining Order prepared by our attorney and based upon my personal knowledge, state that the contents of these documents are true and correct to the best of our knowledge.

Marrien Surin ames t

J.S. and M.S., parents of A.S.

Signed and sworn before me this 10th day of January, 2018



ILND 44 (Rev. 07/10/17) Case: 1:18-cv-00181 Do CIVENT #COVERCEPT18 Page 1 of 1 PageID #:60

The ILND 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. *(See instructions on next page of this form.)*

I. (a) PLAINTIFFS				DEFENDANTS							
JS and MS as parents of AS				Board of Education for Schaumburg School District # 54 and The Sta of Illinois							
(b) County of Residence of First Listed Plaintiff Cook (Except in U.S. plaintiff cases)					County of Residence of First Listed Defendant Cook (In U.S. plaintiff cases only)						
					Note: In land condemnation cases, use the location of the tract of land involved.						
(c) Attorneys (firm name, ad	ldress, and telephone number)				Attomeys (if known)						
Law Offices of Steven G 60062 847-480-7749	link, 3338 Commercial	Avenue Northbi	rook, Il		Darcy Kriha of Fran 312-986-0300 & Illii						
II. BASIS OF JURISDI	CTION (Check one box, or	ıly.)			ZENSHIP OF PRIN			Diversity Cases Or	nly.)		
U.S. Government Plaintiff	3 Federal Question (U.S. Government not of	a party)			k <u>on</u> e box, only for plaintiff an PTI n of This State	F DEF		ncipal Place 🛛 🗌	PTF] 4	DEF 4	
2 U.S. Government Defendant	4 Diversity (Indicate citizenship of	parties in Item III.)		Citizen of Another State 2 2 Incorporated and Print of Business in Another] 5	□5		
					n or Subject of a 🛛 🗍 eign Country	3	3 Foreign Nation	C]6	6	
IV. NATURE OF SUIT								·			
CONTRACT	PERSONAL INJURY	RTS PERSONAL INJUR	et di	_	RISONER PETITIONS	710 5-1	LABOR r Labor Standards Act	OTHER S		ES	
I 110 Insurance I 120 Marine	310 Airplane	365 Personal Injury -		Ha	ibeas Corpus:	🗖 720 Lai	oor/Management Relations	🔲 376 Qui Tam (1	31 USC 3		
130 Miller Act 140 Negotiable Instrument	315 Airplane Product Liability	Product Liability 367 Health Care/		_	0 General 5 Death Penalty	_	ilway Labor Act nily and Medical	400 State Reap	portionme	ent	
150 Recovery of Overpayment	320 Assault, Libel & Slander	Pharmaceutical			0 Mandamus & Other	—	ave Act	430 Banks and	Banking		
& Enforcement of Judgment	330 Federal Employers'	Personal Injury			0 Civil Rights	_	her Labor Litigation	450 Commerce			
151 Medicare Act	Liability	Product Liability		-	5 Prison Condition 0 Civil Detainee - Conditions	791 Employee Retirement		460 Deportatio			
152 Recovery of Defaulted Student Loans (Excludes Veterans)	 340 Marine 345 Marine Product Liability 	368 Asbestos Persona Product Liability			of Confinement	Inc	ome Security Act	470 Racketeer			
☐ 153 Recovery of Veteran's Benefits	345 Marine Product Elability	riodaet Elability	,					Corrupt Organizations 480 Consumer Credit			
160 Stockholders' Suits	355 Motor Vehicle	PERSONAL PROP	ERTY			PRO	PERTYRIGHTS	490 Cable/Sat	тv		
190 Other Contract	Product Liability	370 Other Fraud				820 Copyrights		850 Securities/	Commodi	ties/	
195 Contract Product Liability	360 Other Personal Injury	371 Truth in Lending				830 Pat		Exchange 890 Other State	ntom Arti		
☐ 196 Franchise ☐ 362 Personal Injury - ☐ 380 Other Personal Medical Malpractice Property Damage ☐ 385 Property Damage Product Liability		380 Other Personal Property Damage				835 Patent – Abbreviated New Drug Application		□ 891 Agricultur	-	0115	
		•			840 Trademark		893 Environme 895 Freedom o				
	CHUR DIOURS	DANKORDO	11.7	1. 700	REFERENCIARY		HALL SECURITY	896 Arbitration		adura	
210 Land Condemnation	440 Other Civil Rights	BANKRUPTC 422 Appeal 28 USC			Drug Related Seizure	□ 861 HL		Act/Review			
220 Foreclosure	441 Voting	423 Withdrawal 28 U			of Property 21 USC 881	🗖 862 Bla	ck Lung (923)	Agency De			
230 Rent Lease & Ejectment	442 Employment			690	Other		WC/DIWW (405(g))	950 Constitutio	-		
240 Torts to Land	443 Housing/					□ 864 SS □ 865 RS	ID Title XVI	State State	utes		
245 Tort Product Liability 290 All Other Real Property	Accommodations 445 Amer. w/Disabilities -	462 Naturalization A				L 805 KS	i (405(g))				
	Employment	463 Habeas Corpus -									
	446 Amer. w/Disabilities -	Alien Detainee (Prisoner Petition)		•		REDERAL TAXES					
	Other	465 Other Immigrant					xes (U.S. Plaintiff				
	448 Education	Actions				or Defendant) 871 IRS—Third Party					
						20	5 USC 7609				
V. ORIGIN (Check one box, or	nly.)										
I Original 2 Ren Proceeding Stat		anded from E Ellate Court] 4	Reins Reop		sferred fro her Distri		Liti	ltidistrict gation ect File	t	
VI. CAUSE OF ACTION write a brief statement of cause.)	(Enter U.S. Civil Statute under	which you are filing an	ju	dge foi	Previous Bankruptcy N r any associated bankruptcy m	Aatters		nd 423, enter the c	ase num		
20 USC 1400 et al- State	Medical Cannabis law	unconstitutional	att	achme	ent if necessary.)				=		
VIII. REQUESTED IN COMPLAINT: injuntion		is is a class action u .P.	nder Ru	le	DEMAND \$ 0		Check Yes only if d JURY DEMAND:			t.	
IX. RELATED CASE(S) IF ANY	(See instructions) Judge				Ca	se Numb	er				
X. Is this a previously dismi	_	Yes 🔳 No If yes	, Case #	ŧ	Nai	me of Ju	lge	<u>.</u>			
Date		of attorney of record									
1/10/18	s/ Stev	en Glink									