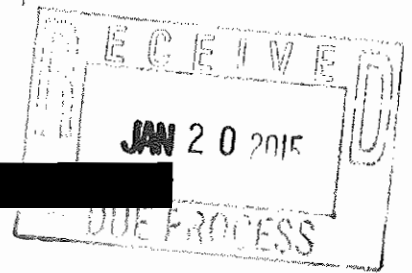


January 16, 2015

(Complainants: [REDACTED] ( Student ) and [REDACTED]  
[REDACTED] (Parents)



Address: [REDACTED] Phone: 860-[REDACTED]  
[REDACTED]

Child's Name: [REDACTED] Date of Birth: [REDACTED]

Education Agency: Region 10 School District

Name of School Child Attended: Hartford Magnet Trinity College  
Academy

Disability Category: [REDACTED]

Child's Address: [REDACTED]  
[REDACTED]

This Complaint is filed by the Complainants asserting that Hartford Trinity Magnet Trinity College Academy and Region 10 School District have violated the Individuals with Disabilities Education Improvement Act (IDEA), 20 U.S.C. Section 1400 et.seq., Connecticut General Statutes Section 10-76a-1, et.seq. and corresponding regulations at CFR Part 300 and Regulations of Connecticut State Agencies (RCSA) Section 10-76 as follows:

**ISSUE I:**

By failing to make certain that the assistive technology devices that were found to be necessary for the student, in this case, the I Pad, were made available to the student as required by 34 CFR Section 300.105 (a) and RCSA 10-76-1(2)(3) , more specifically:

- The request for an Assistive Technology (AT) Evaluation was made on February 17, 2013 (See correspondence from Linda Carabis (Region 10 Director of Student Support Services).

- The evaluation was actually performed by Ms. Natale on April 26, 2013, but the Report was not sent until June 30, 2013 (See AT Assessment Report).
- The meeting to implement the AT Report was not held until September 11, 2013 (See IEP dated 9/11/13).
- According to the Summary in the 9/11/13 IEP, student had the iPad at some point prior to this meeting, but training did not take place until 11/21/13.
- Although a wireless keypad had been recommended by Ms. Natale following the training in 11/13, it had not been provided to the student as of the 2/04/14 IEP (Summary of that IEP).
- The actual training regarding implementation was not done until November 21, 2013 (See email from Mr. Marker to [REDACTED] of that date and Summary in 2/04/14 IEP).
- Further, the Report recommended that the training include all members of the Team and in the Summary in the 9/11/13 IEP, Linda Carabis (Region 10) agreed that the parents should participate in the training with the school staff. Although [REDACTED] Marker indicates in the Summary of the 2/04/14 IEP, that “when Mrs. Natale came to the school in November, she worked with [REDACTED] and his teachers”, to the contrary, in his email to [REDACTED] dated 11/21/13, he indicates, that “he was not able to schedule it for all of the teachers and that only he was present for the training”. The parents were not given the opportunity to participate in the training.
- The physical access of the iPad to the student alone does NOT satisfy the requirement of making it “available”. On the “Program Accommodations and Modifications” Page of the 9/11/13 IEP, it’s use is indicated as “required in all classes for the duration of the IEP” Further, in the that same IEP it is not only included in “Materials, Books and Equipment”, but it is also included in “Instructional Strategies”, again “required during all classes for the duration of the IEP”, with other items that the teachers are required to use with this student. By admission in the Summary of the 2/04/14 IEP, that did not take place.

## ISSUE II:


By failing to implement the 9/11/13, 2/04,14 and 4/09/14 IEPs as written as required by 34 CFR Section300.323(a) and RCSA 10-76d-1 (a)(3), more specifically as follows:

- In the Summary in the 9/11/13 PPT, Linda Carabis (Region 10) agreed that the parents should participate in the training with the school staff. Although Mr. Marker indicates in that Summary that the student's "teachers" were trained, to the contrary, in his email of 11/21/13 to [REDACTED] he indicates, that "he was not able to schedule it for all of the teachers and that only he was present for the training". The parents were not given the opportunity to participate in the training.
- On the "Program Accommodations and Modifications" Page of the 9/11/13 IEP, the access to the iPad is indicated as "required in all classes for the duration of the IEP" Further, in that same IEP it is not only included in "Materials, Books and Equipment", but it is also included in "Instructional Strategies" and again is "required during all classes for the duration of the IEP", with other items that the teachers are required to use with this student, as an "instructional strategy", as opposed to solely for typing. By admission in the Summary in the 2/04/14 IEP, that did not take place.

In summary, even though the PPT Team agreed that an AT evaluation be done and was in fact done in the 2<sup>nd</sup> half of the 2012-2013 school year, the results of that evaluation were never fully implemented at any point in the 2013-2014 school year. The student finished the 2013-2104 school year at Hartford Trinity Magnet School, without ever having the violations as set forth in this Complaint corrected. He is currently enrolled and attending Forman School in Litchfield, CT, a college preparatory secondary school for students with learning disabilities, where he and his teachers receive among many other educational benefits, proper access and instructional strategy training on AT equipment.

Complainants request that Region 10 School District and Hartford Magnet Trinity College Academy be required to provide compensatory relief to the student/Complainants for the detriment suffered as a result of these violations.

Respectfully submitted,

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Karen B. Randall, Attorney  
On behalf of Complainants