



Center for
Children's
Advocacy

Complaint Against Connecticut Technical High School System (CTHSS)

Greater Hartford Legal Aid ("GHLA") and the Center for Children's Advocacy ("CCA") jointly file this complaint against the Connecticut Technical High School System ("CTHSS"). GHLA¹ and CCA² will be collectively referred to hereinafter as "Complainants."

GHLA and CCA allege that CTHSS applies its admissions policies in ways that discriminate against students with disabilities in violation of the Americans with Disabilities Act ("ADA") and Section 504 of the federal Rehabilitation Act of 1973, and the implementing regulations. GHLA and CCA jointly file this complaint as organizational complainants on behalf of all students with disabilities who have applied for, and been denied admission to, the incoming ninth grade class for 2016-2017 at the CTHSS as a result of the CTHSS discriminatory admissions policies and processes, in violation of Title II of the ADA of 1990, 42 U.S.C. §12131 *et. seq.* and its implementing regulations, 28 C.F.R. part 35,³ and Section 504 of the Rehabilitation Act of 1973, 29 U.S.C. § 794 and its implementing regulations, 34 C.F.R. part 104⁴ and Appendix B "Guidelines for Eliminating Discrimination and Denial of Services on the Basis of Race, Color, National Origin, Sex and Handicap in Vocational Education Programs" (*hereinafter*

¹ GHLA is a non-profit law firm whose attorneys advocate for equal justice for poor people, work with clients to promote social justice, and use the law to address the effects and root causes of poverty. GHLA represents students with disabilities to enforce their right to a free and appropriate education, special education services, due process in school discipline, and quality compensatory educational services if required to remediate failures of the school system.

² The Center for Children's Advocacy ("CCA") is a non-profit legal advocacy organization in Connecticut whose mission is to promote and protect the legal rights and interests of poor children who are dependent upon the judicial, child welfare, health and mental health, education, and juvenile justice systems for their care.

³ "No qualified individual with a disability shall, on the basis of disability, be excluded from participation in or be denied the benefits of the services, programs, or activities of a public entity, or be subjected to discrimination by any public entity." 28 C.F.R. § 35.130(a). "A public entity shall not impose or apply eligibility criteria that screen out or tend to screen out an individual with a disability or any class of individuals from fully and equally enjoying any service, programs, or activity, unless such criteria can be shown to be necessary for the provision of the service, program, or activity being offered." 28 C.F.R. § 35.130(b)(8).

⁴ "No qualified handicapped person shall, on the basis of handicap, be excluded from participation in, be denied the benefits of, or otherwise be subjected to discrimination under any program or activity which receives Federal financial assistance. (b) Discriminatory actions prohibited. (1) A recipient, in providing any aid, benefit, or service, may not, directly or through contractual, licensing, or other arrangements, on the basis of handicap: (i) Deny a qualified handicapped person the opportunity to participate in or benefit from the aid, benefit, or service..." 34 C.F.R. § 104.4.

"Guidelines"),⁵ and Conn. Gen Stat. § 46a-75.⁶ Due to this discrimination, students with disabilities are under-represented in the state's technical high school system, a system that should

⁵ Relevant portions of the Guidelines provide as follows: "Criteria controlling student eligibility for admission to vocational education schools, facilities and programs may not unlawfully discriminate on the basis of race, color, national origin, sex, or handicap. A recipient may not develop, impose, maintain, approve, or implement such discriminatory admissions criteria." Guidelines, § IV.A.

"Recipients may not judge candidates for admission to vocational education programs on the basis of criteria that have the effect of disproportionately excluding persons of a particular ... handicap. However, if a recipient can demonstrate that such criteria have been validated as essential to participation in a given program and that alternative equally valid criteria that do not have such a disproportionate adverse effect are unavailable, the criteria will be judged nondiscriminatory. Examples of admissions criteria that must meet this test are past academic performance, record of disciplinary infractions, counselors' approval, teachers' recommendations, interest inventories, high school diplomas and standardized tests, such as the Test of Adult Basic Education (TABE)." Guidelines, § IV.K.

"Recipients may not deny handicapped students access to vocational education programs or courses because of ... the need for related aids and services or auxiliary aids. If necessary, recipients must: (1) Modify instructional equipment; (2) modify or adapt the manner in which the courses are offered; ... and (4) provide auxiliary aids that effectively make lectures and necessary materials available to postsecondary handicapped students; (5) provide related aids or services that assure secondary students an appropriate education.

Academic requirements that the recipient can demonstrate are essential to a program of instruction or to any directly related licensing requirement will not be regarded as discriminatory. However, where possible, a recipient must adjust those requirements to the needs of individual handicapped students.

Access to vocational programs or courses may not be denied handicapped students on the ground that employment opportunities in any occupation or profession may be more limited for handicapped persons than for non-handicapped persons." Guidelines, § IV.N.

"Recipients must insure that their counseling materials and activities (including student program selection and career/employment selection), promotional, and recruitment efforts do not discriminate on the basis of ... handicap." Guidelines, § V.A.

"Recipients must conduct their student recruitment activities so as not to exclude or limit opportunities on the basis of ... handicap. Where recruitment activities involve the presentation or portrayal of vocational and career opportunities, the curricula and programs described should cover a broad range of occupational opportunities and not be limited on the ... handicap of the students or potential students to whom the presentation is made." Guidelines, § V.C.

⁶ "(a) All educational, counseling, and vocational guidance programs and all apprenticeship and on-the-job training programs of state agencies, or in which state agencies participate, shall be open to all qualified persons, without regard to race, color, religious creed, sex, gender identity or expression, marital status, age, national origin, ancestry, intellectual disability, mental disability, learning disability or physical disability, including, but not limited to, blindness.

(b) Such programs shall be conducted to encourage the fullest development of the interests, aptitudes, skills, and capacities of all students and trainees, with special attention to the problems of culturally deprived, educationally handicapped, learning disabled, economically disadvantaged, or physically disabled, including, but not limited to, blind persons.

(c) Expansion of training opportunities under these programs shall be encouraged so as to involve larger numbers of participants from those segments of the labor force where the need for upgrading levels of skill is greatest." Conn. Gen. Stat. § 46a-75.

provide all students with valuable career alternatives. According to the State of Connecticut Department of Education ("SDE") statistics, in 2013-14, only 8.2% of students in the CTHSS were students with disabilities, compared with 12.4% statewide. The CTHSS has continued to exclude students with disabilities in violation of the law despite the fact that the CTHSS entered into a Voluntary Resolution Agreement ("VRA") with OCR just over one year ago to resolve similar complaints of discrimination. *See attached VRA*, 115 LRP 50585, Complaint # 01-13-1169, 01-13-1232, dated May 27, 2015.

The Complainants contend that the CTHSS' admissions policy improperly excludes and has a discriminatory impact on students with disabilities in that it:

- 1- Imposes additional admissions criteria for students with disabilities,
- 2- Predetermines admission based solely on scores on norm-referenced tests⁷ for students with disabilities only, and in advance of any IEP team meeting (classified as a Planning and Placement Team Meeting in Connecticut, hereinafter a "PPT"), making the PPT process both futile and misleading,
- 3- Utilizes criteria that has not been demonstrated to be essential to participation in CTHSS, and
- 4- Bases decisions on the ability of a student with disabilities to access the general education curriculum without reasonable modifications and accommodations when failing to make reasonable modifications and accommodations is in itself discriminatory.

The Complainants offer the following background on the CTHSS admissions and academic program, as well as ten case studies to illustrate CTHSS' implementation of its admissions policy and its discriminatory policies and practices. All acts or omissions that resulted in violations of federal law occurred during the period of January 1, 2016 to the present.

The CTHSS Admissions Process and Program

All students:

The CTHSS is established by the Connecticut State Board of Education pursuant to Conn. Gen. Stat. § 10-95 and operates as a state agency. The CTHSS is a recipient of federal financial assistance. The CTHSS is comprised of twenty individual schools. *See* <https://www.cttech.org/schools>.

The CTHSS uses one uniform application across all of its high schools. Students may apply to a maximum of four technical schools on a single application, ranked by the student in order of preference. The application is then submitted to the student's first choice school. *See attached Application*.⁸

⁷ An example of a norm-referenced test is the Measure of Academic Progress (MAP) by the Northwest Evaluation Association (NWEA).

⁸ The application form had been available on-line at www.cttech.org. The website is being revised and the Application sections are still under construction.

Pursuant to the "CTHSS Application Process," the admissions criteria is based on the following formula which is applied to the incoming ninth grade class of 2016-2017:

Students are assigned points based on the information submitted in their application....points are awarded based on English and Math grades. Other application information is gathered for study purposes only. This can vary from year to year. The applicants' total score determines their placement on a ranked list... highest total score to the lowest total score. ... All CTHSS schools rank students in the same manner...Student applicants who do not meet the initial admissions criteria are placed on a wait list. If your child meets the first step of the application process and the Parental Return Statement form is received indicating intent to attend, we will notify your school of required additional information as identified in the student application.

See attached CTHSS Application Process.

The application directs sending schools to forward the seventh grade final report card, eighth grade completed marking period information (transcript), attendance, discipline record, and most recent norm-referenced screening data for numeracy and literacy including scaled scores as available, and Language Assessment Scale (LAS LINKS) for those students who are English Language learners.

Pursuant to the Application Process, the following criteria apply to students applying as ninth grade students for the 2016-2017 academic year:

- "English and math grades" refers to grades achieved in the applicant's English and math classes for seventh and eighth grade and are the only criteria awarded points on the scoring rubric to develop the ranked list,⁹
- CTHSS does not assess the math curricula of individual districts to determine if the eighth grade math curriculum adequately teaches pre-Algebra skills,
- CTHSS does not ask teachers/schools to attest that the applicant is ready to take Algebra in ninth grade,
- Scores for norm-referenced test scores are not awarded points for purposes of the ranked list,
- There is NO admission dependent, qualifying placement test,
- There are NO established, cut-off, norm-referenced English or math scores for admission,
- Norm-referenced test scores are collected for "study purposes only," and
- Points are not awarded for interest, attendance, or discipline records.¹⁰

⁹ See attached CTHSS Application Process ("For the freshman class of 2016-2017 points are awarded based on English and Math grades. Other application information is gathered for study purposes only") and Sample Rejection Letter ("Your child's final rank score, earned through points based on English and Math grades has placed him/her below the applicants currently selected to move forward.").

¹⁰ See attached CTHSS Application Process and Sample Rejection Letter.

All students, including those with disabilities, with top scores on the ranked list for each individual CTHSS, based on the points awarded for math and English grades, receive a letter of Initial Acceptance. *See attached Letter of Initial Acceptance.*

For all students, the application process is not complete until, and final acceptance is predicated upon, the CTHSS' receipt of the following documents no later than July 8, 2016:

- Parental Return Statement (intent to attend), and
- Complete school records that indicate:
 - No serious disciplinary infractions (further defined on the application as "dangerous criminal offense"),
 - Successful completion of 8th grade, and
 - Record of immunizations as required by state law

See attached Application.

Students with Disabilities:

Starting with applicants for academic year 2015-2016, additional steps in the application process were required for students with disabilities receiving special education or with a 504 Plan. *See attached Memorandum from Isabelina Rodriguez, Ed.D., Chief, Bureau of Special education, and Nivea Torres, Ph.D., Superintendent, CTHSS, to Directors of Special Education Pupil Personnel Services, dated April 14, 2015 (hereinafter "Revised Admissions Process").*

Pursuant to the Revised Admissions Process, if a student is a "top scoring student" based on the scoring/ranking rubric for all students, the student will receive a Letter of Initial Acceptance, and the parent must then complete and return the "Parental Return Statement" declaring intent to attend the CTHSS. The parents (and/or sending school) must send the student's "entire 504 and special education records within 10 school days after the student has accepted his/her seat." *See attached Revised Admissions Process, ¶ 2.d.*¹¹

Students are notified in the Letter of Initial Acceptance that: "A 504 or planning and placement team (PPT) will be convened for a student with special needs to determine what services are appropriate for the student in the CTHSS environment. In some instances, a team may determine that the CTHSS is not an appropriate placement for a student." *See attached Revised Admissions Process, ¶ 3 (emphasis in original).*

The CTHSS invites sending district personnel to the PPT (*hereinafter* "Admissions PPT") and "strongly encourage[s] [them] to participate in these meeting in order to determine appropriate educational programming." *See attached Revised Admissions Process, ¶ 5.*

¹¹ The policy later states that only three years of special education records, including the most recent triennial evaluation or previous three year of 504 records" are required. *See attached Revised Admissions Process, ¶ 4.*

The Revised Admissions Process asks that Directors of Special Education consider a chart comparing a traditional high school to the CTHSS in the areas of curriculum, intensity, class standards, scheduling flexibility and adjustments, transition among classes, and safety "to assist student, families, and district personnel when exploring whether or not the CTHSS is an appropriate setting in which a student can pursue is/her high school education." (*hereinafter* "Programming Considerations Chart"). See *attached* Revised Admissions Process and Programming Considerations Chart.

The CTHSS developed the Revised Admissions Process, dated April 14, 2015, subsequent to the filing of OCR complaints ## 01-13-1169 and 01-13-1232 and prior to the execution of the VRA on May 27, 2015. The VRA permits continued use of the Revised Admissions Process and contains CTHSS attestations to comply with federal law, including the Guidelines. See *attached* VRA.

The VRA sets forth numerous reporting obligations of CTHSS on its evaluation of its admissions criteria, including a review of accepted/rejected students with disabilities. VRA §§ A.2, B.5, C.7-9. It is Complainants' understanding that OCR is still monitoring CTHSS pursuant to the VRA. See *attached* Email from Patricia Cox, Civil Rights Investigator, U.S. Department of Education, Office of Civil Rights to Marisa Mascolo Halm, Esq., Center for Children's Advocacy, May 10, 2016.

Case Examples:

In each of the cases recounted below, the student and parent were not represented by legal counsel until noted. Each student was in the eighth grade for academic year 2015-2016 and applied to the CTHSS as an incoming ninth grader for academic year 2016-2017.

██████ is a fifteen-year-old Bridgeport Public Schools ("BPS") student who recently finished eighth grade at Waltersville School. ██████ receives special education services, due to a "Specific Learning Disability." A February 24, 2016 IEP details the amount of special education services recommended for ██████: one period/day of specialized instruction for language arts (in a separate setting) and one period/day of specialized instruction for math (in the form of a "push-in" by the special education teacher into her regular education class). See *attached* February 24, 2016 IEP. Notes in the IEP mention she is "pleasant to teach." Progress monitoring from the 2015-2016 school year contains almost all "S's" to denote "Satisfactory Progress." ██████ has no disciplinary history, including zero "write-ups" in PowerSchool (BPS' online database) and zero school exclusions. By the third quarter of the 2015-2016 school year (the report card provided to the CTHSS), ██████ had received all A's and one B on her report cards.

█████ and her mother attended an Admissions PPT at Platt Technical School on March 30, 2016. Accompanying them was █████'s guidance counselor from Waltersville School, Sherene Kennedy, and her special education teacher, Samantha Erlingheuser. Upon entering the room, the CTHSS immediately began to question █████ about why she wanted to go to Platt Tech, which made █████ feel uncomfortable. From the start of the meeting, █████, her mother, and the Waltersville staff members felt as if the outcome of the meeting was predetermined by the technical school team, in that they were going to reject her placement. For example, Ms. Kennedy pointed to █████'s grades as evidence of her solid academic abilities, and an individual from the technical school team responded, "They only gave her those grades because she's in a resource room." █████, her mother, Ms. Kennedy, and Ms. Erlingheuser felt the CTHSS was demeaning and dismissive of █████, both in tone and content.

After making their decision known, the CTHSS personnel asked █████'s mom repeatedly if she had any more questions. She answered, "You have already made up your mind, so nothing I say will make a difference." In addition, after witnessing █████ and her mother's reaction to the meeting's tone, the CTHSS staff members asked █████'s mother why they "put all of their eggs in one basket." Ms. Kennedy, █████'s guidance counselor, responded that a student is required to reject other schools after being accepted to one. █████ and her mother left, and █████ began sobbing almost immediately as they entered the hallway.

The resulting recommendation states: "Student's present educational need for 182 days of instruction in math and reading and modified grades based on IEP cannot be implemented without a fundamental alteration of our program. It was the determination of the team that CTHSS is not an appropriate setting for [█████] at this time." *See attached* March 30, 2016 IEP.

█████'s teachers wrote recommendations to support her acceptance into Platt Tech. Math teacher Dennis Boskello wrote, "I can attest that she requires no accommodations or modifications in work load or content. She is on grade level..." █████'s English/Language Arts teacher, Ms. Ramanauskas, attested, "She is a hardworking, dedicated student...[she] reads on-level eighth grade fiction and nonfiction text and successfully responds to short answer and extended response questions." Ms. Ramanauskas added that █████ has received "district-wide recognition for her beautiful poetry" and that the supports she provides to █████ are "generic" and "are available to every student [she] instruct[s]." She countered the assertion by CTHSS that █████'s grades had been modified: "The BLA grades that [█████] earned have not been modified or altered in any way." █████'s science, social studies, and special education teachers all wrote recommendations as well, including such descriptions of █████ as "a good student who is always eager to learn," "a pleasure to have in class...[and] always focused, determined, and prepared every day," "an asset to our school...[and a] dedicated student," and "a leader...[who] enjoys the learning process and wants to continue to build her knowledge....[and who] will be an excellent addition to the high school program..." *See attached* Teacher Recommendations, Waltersville School staff, April 2016.

█████ is a Hartford Public Schools ("HPS") student who attended the Burns School. █████ was identified as eligible for special education supports and services in first grade with a language-based learning disability. Her non-verbal IQ is in the average range. During 2015-2016, █████ was able to complete close to grade level work in mainstream classes, though her norm-referenced test scores are lower. Specifically, her Fall 2015 MAP for reading was 189, up to 194 in Spring 2016 (beginning third-grade level) and her Fall 2015 MAP for math was 200, up to 202 by Spring 2016 (beginning fourth-grade level).

For the upcoming ninth grade year, the May 4, 2016 HPS PPT recommended: "school social work services for 30 minutes/week, push-in math support 2 hours/week and push-in language arts support 2 hours/week." *See attached* May 4, 2016 IBP.

█████'s Admissions PPT with the CTHSS at E.C. Goodwin Technical High School took place on May 31, 2016. The PPT was attended by the special education teacher, guidance counselor, and behavior specialist of the sending school, her counsel, and a representative of her Intensive In-home Child and Adolescent Psychological Services ("IICAPS") team.¹² In reviewing █████'s IBP, the CTHSS staff focused on █████'s math performance and concluded that her fourth-grade math level was not a pre-Algebra level. She was, therefore, not "Algebra-ready" for ninth grade. The CTHSS personnel further noted that █████'s low reading level would make her unable to access the tenth-grade Reading level of the trade books used in the curriculum. Referencing █████'s May 4, 2016 IBP, the CTHSS staff noted that "curricular materials are modified to provide access to the content in math and reading the general education classes, and those modifications will be continued in 9th grade." The CTHSS team concluded that "the student's special education instructional needs preclude her participation in the CTHSS curriculum." *See attached* May 31, 2016 IBP.

The CTHSS team stressed the May 4, 2016 IBP's description of the "impact of student's disability on involvement and progress in the general education curriculum" which stated as follows: "Due to █████'s assessed deficits in reading [and algebraic thinking], she is unable to meet the expectations of the grade level curriculum or access her full educational program without the need for accommodations, modifications, and/or specially designed instruction." The CTHSS staff then indicated that CTHSS does not make any modifications to grade level work or standards, pacing, or curriculum. Given her needs, the CTHSS team determined that █████ could not access the general education curriculum and that CTHSS could not accommodate █████.

█████ has attended HPS (Burns School) since moving to Hartford from Puerto Rico in 2011. Pursuant to his IBP, █████ is identified to receive special education supports and services under the disability category of "Other Health Impaired." He fully participated in mainstream classes,

¹² The CTHSS staff questioned █████'s need for intensive psychiatric services and pressed the school as to why it referred █████ to such a high level of care. █████'s mental health providers explained that the referral was not made by the school and the school noted that █████ never has behavioral issues within the classroom.

with daily English Language Learner ("ELL") supports. Though [REDACTED] had a difficult seventh grade year behaviorally, he showed considerable growth and maturity during his eighth grade year.¹³ [REDACTED] also made significant gains in reading comprehension and ELL skills. *See attached* November 18, 2015 and May 26, 2016 IEPs.

CTHSS convened an Admissions PPT (Vinal Technical High School) on May 16, 2016. The special education teacher, guidance counselor, and math teacher from HPS attended by phone, as did [REDACTED], his guardian, and undersigned counsel. The CTHSS team expressed concerns with [REDACTED]'s Reading and math levels, and his preparedness for Algebra I, given his math goals. The CTHSS team asked [REDACTED]'s math teacher whether [REDACTED] had pre-Algebra skills and whether he was "Algebra-ready." The CTHSS personnel questioned whether the math curriculum used by the Burns school covered pre-Algebra skills, and even asked for specificity about the last two topics covered. [REDACTED]'s Math teacher noted that [REDACTED] responds to multiple teaching techniques and that he has minimal accommodations in class, namely extra examples. [REDACTED] had not fallen behind the pace of his eighth grade math class, and in fact, was one of the top students in his class. The CTHSS team then inquired why the HPS sending school could not specify Math placement for ninth grade and asked that a second PPT be convened. Counsel explained that all ninth grade students in HPS are placed in Algebra I regardless of performance level or grades.

At the May 16, 2016 Admissions PPT, counsel asked the CTHSS team about assistive technology supports for reading to help [REDACTED] access texts in the general education curriculum. CTHSS staff who attended the Admissions PPT were not knowledgeable about available assistive technology supports and they could not directly answer the question. Rather, the CTHSS representatives sidestepped the question, replying that textbooks used at CTHSS are identical to those used in the trade schools. The CTHSS personnel added that CTHSS students take the same testing for trades as in trade school, some of which may allow for minimal accommodations. The CTHSS staff could not offer any specific accommodations or name those trades that might offer such accommodations.

Counsel also inquired about ELL supports at CTHSS at the May 16, 2016 Admissions PPT. Again, the CTHSS personnel had no information to share about the level of supports.

On May 31, 2016, CTHSS convened a second Admissions PPT at Vinal Technical High School. The CTHSS team again asked the HPS personnel about the math curriculum being used in Burns School, questioning whether it was a pre-Algebra curriculum, and whether [REDACTED] was "Algebra-ready." Counsel explained that HPS students are not tracked in their math programming; i.e., all students in eighth grade in the same school take the same math course. Similarly, in ninth grade, all HPS students are enrolled in Algebra I regardless of performance in eighth grade math or on any standardized or norm-referenced assessment.

At the conclusion of the second Admissions PPT, the CTHSS team "determined that due to [REDACTED]'s need for alternate worksheets, modified work, modified assessment criteria, and his

¹³ The CTHSS personnel also questioned the sending school team why a Behavior Intervention Plan (BIP) or Safety Plan was not developed and about [REDACTED]'s need for psychiatric evaluation. The sending school team reflected that [REDACTED]'s emotional growth was significant and that a BIP or Safety Plan was completely unnecessary.

need for 180 days of instruction to continue to make progress, an appropriate program cannot be implemented at Vinal Technical High School without a fundamental alteration of CTHSS programming." *See attached May 31, 2016 IEP.*

██████

██████ is an HPS (Kennelly School) student. Pursuant to his IEP, ██████ is identified as eligible to receive special education supports and services under the primary disability of Other Health Impaired/ADHD.

Based on ██████'s March 10, 2016 HPS IEP (annual review), ██████ receives only one and one-half hours/week "push-in" language arts support, one and one-half hours/week push-in math support, and one hour/week speech and language services. ██████ requires assistance with organization, can be inconsistent with homework, and is distracted, but not hyperactive. He requires a multisensory reading program. His norm-referenced MAP score for Fall 2015 in reading was 199 (approx. beginning fourth-grade level) and math was 202 (beginning fourth-grade level). Psychological testing from March 2015 demonstrates average cognitive ability, with high Visual Motor Integration scores (112). The "impact of the student's disability on involvement and progress in the general education curriculum" is described as "[his] disability affects his ability to access the general education curriculum without support." *See attached March 10, 2016 IEP.*

CTHSS convened an Admissions PPT with CTHSS at E.C. Goodwin Technical High School on June 2, 2016. ██████'s classroom teacher from HPS's Kennelly School, Shari Gill, attended the PPT with ██████ and his family. The CTHSS staff focused on ██████'s below grade level performance in math and reading and determined that ██████ was not "Algebra-ready," ostensibly basing its determination on Ms. Gill's statement that "student's ninth grade plan is Pre-Algebra." The CTHSS Admissions PPT then concluded that "students' needs preclude participation in CTHSS programming." *See attached June 2, 2016 IEP.*

██████

██████ attended the HPS (Burns School) for eighth grade. She attended school in Bloomfield for seventh grade. Bloomfield identified ██████ as eligible for special education as a student with "Multiple Disabilities" due to her diagnosis of ADHD and a Specific Learning Disability in math. During her seventh grade year, ██████ progressed "three grade levels on the AIMSweb math computation test." *See attached Carmen Arace Middle School, June 22, 2015 Progress Report.*

At her October 6, 2015, HPS changed her primary disability to "Specific Learning Disabilities" in math. ██████'s Present Levels of Performance indicate that ██████ is on grade level for reading, but in math "has difficulty retaining concepts taught, and applying strategies to independent work." *See attached October 6, 2015 IEP.*

The Present Levels of Performance from her March 1, 2016 annual review IEP indicate that "[REDACTED]'s inability to understand and solve grade level mathematical concepts as presented in the general education classroom impacts her progress in the general education curriculum." [REDACTED]'s IEP required two hours/week push-in math support, two hours/week resource math support, and thirty minutes/week individual social work supports. Norm-referenced MAP testing showed growth in math from 187 in Fall 2015 to a score of 205 in Spring 2016 (early-mid fourth-grade level) and a *de minimis* drop in reading from 217 to 216 (mid seventh-grade level). [REDACTED]'s LAS (ELL test scores) placed her at "level 4-5" in all areas. *See attached* March 1, 2016 IEP.

[REDACTED]'s Admissions PPT with CTHSS took place on May 31, 2016 at Vinal Technical High School. [REDACTED]'s special education teacher from her HPS sending school, Ms. Mayo, attended the meeting as well. The CTHSS team paid particular attention to [REDACTED]'s math scores and elicited from Ms. Mayo that "[REDACTED] is working on multiplication and that her math work needs to be modified in order for her to access the content." As a result, the CTHSS "determined that due to [REDACTED]'s need to have math content modified, her needs preclude participation in CTHSS programming." *See attached* May 31, 2016 IEP.

[REDACTED]

[REDACTED] is a student in the Bristol Public Schools. He is identified for special education under the category of "Emotional Disturbance." For the 2015-2016 school year, [REDACTED] attended the GOAL program at Greene-Hills School. The GOAL program is a self-contained program in which students earn mainstreaming opportunities. [REDACTED] was mainstreamed for all but five hours per week for the entire 2015-2016 school year. He performed well academically, but his behavior occasionally interfered with his learning. Bristol Public School's IEP for the 2016-2017 school year placed [REDACTED] in a self-contained program to assist him with transitioning to high school, but the PPT intended to meet again early in the school year (within approximately two weeks of school starting) to review his transition and scale back his self-contained hours and give him more mainstream time in regular education classes as appropriate, per Dr. Michael Dietler, Supervisor of Special Services, Bristol Public Schools.

For the 2016-2017 school year, [REDACTED] applied to the CTHSS (E.C. Goodwin Technical High School). He was initially accepted, with the understanding that the CTHSS would convene a PPT meeting to review whether the school was an appropriate placement for [REDACTED].

At the Admissions PPT meeting with the CTHSS on May 17, 2016 at E.C. Goodwin, the CTHSS staff indicated from the beginning of the meeting that the CTHSS would not be able to provide the services in [REDACTED]'s IEP. His GOAL teacher, Jessica Harris, stated during the PPT that [REDACTED] was probably the most successful student in the program, that he was a pleasure to work with, and he was respectful and responsive. Ms. Harris further stated that [REDACTED] used the GOAL program for behavioral support approximately once or twice per month.

Bristol convened an emergency PPT meeting on May 25, 2016. The Bristol team agreed that because [REDACTED] was doing so well, it was appropriate to reduce his time in a self-contained setting, and agreed that he would have two of his core classes in the mainstream from the beginning of

the year. His services hours were reduced to 5.6 hours every other day. While [REDACTED] would still be in the self-contained Learning Center for math and language arts, the Bristol PPT recommended meeting early in the 2016-2017 school year to discuss additional time in the mainstream setting. See attached May 25, 2016 IEP.

[REDACTED]'s parent and her counsel requested that the CTHSS reconvene a PPT to consider his revised IEP, but the CTHSS refused to do so. See attached Email from Christine Chinni, Esq., to Amy Corbett-Dion, Esq., GHLA, June 20, 2016.

[REDACTED]

[REDACTED] is a HPS student (McDonough School). She is identified as eligible to receive special education supports under the primary disability category of "Specific Learning Disability" (math). [REDACTED] is at or near grade level in reading, with a MAP score in Spring 2016 of 218, (mid seventh-grade level). Her math MAP score in Spring 2016 was 214 (mid fifth-grade level). She has some executive functioning deficits, and some difficulty with homework and classwork completion.

The CTHSS convened an Admissions PPT on June 24, 2016 at E.C. Goodwin Technical School. [REDACTED] attended the PPT with her mother and counsel. Given that summer vacation had started for HPS students, a representative from her sending HPS school did not attend the meeting, though it is unclear whether the CTHSS invited any sending school staff to the Admissions PPT. The CTHSS team questioned [REDACTED] about her eighth grade math class, whether she was "Algebra-ready," and what the HPS sending school was recommending for ninth grade math placement. Counsel again explained (*see infra* for C.R.) that HPS does not track eighth or ninth grade math classes based on ability or past performance, i.e. all ninth grade Hartford students are enrolled in Algebra I. The CTHSS representatives then attributed Hartford's practice of "modifying grades according to the IEP" to its lack of tracking classes based on performance level. The CTHSS team continued by stressing repeatedly that curriculum, pacing, amount of work, and grades could not be modified at the CTHSS.

The CTHSS Admissions PPT offered [REDACTED] a 45-day diagnostic placement at CTHSS (E.C. Goodwin Technical High School) per Regs., Conn. Agen. § 10-76d-14(b). In light of [REDACTED]'s express desire to pursue a career in auto mechanics, [REDACTED] accepted the diagnostic placement. The questions or criteria by which to evaluate [REDACTED]'s diagnostic placement were not determined at the Admissions PPT.

Subsequent to the PPT, [REDACTED] attempted the summer math homework. Per the CTHSS team's stance at the Admissions PPT, the CTHSS did not modify the math homework in any way for [REDACTED]. Finding the summer math work difficult, and fearing the minimal level of supports and the CTHSS' refusal to offer any modifications in math, [REDACTED] withdrew her application from the CTHSS in early July 2016. [REDACTED] intends to enroll in a HPS district school that affords reasonable modifications and accommodations for her needs.

█████ is a fourteen-year-old BPS student who recently completed eighth grade at High Horizons Magnet School ("High Horizons"). █████ is classified as a student with "Autism" on his IEP, and has been mainstreamed for all academic subjects and specials. BPS originally made recommendations for █████ at his March 15, 2016 PPT, which included placement in a "highly structured" environment, though █████ was to be "mainstream[ed] into academic classrooms for all specials and academic subjects." See attached March 15, 2016 IEP, p. 2. He also was to receive four hours/month of speech and language services, and one hour/week of social work services. His "Special Education Annual Report," which was reviewed at the March 15, 2016 PPT, notes that he was "on grade level" for math, science, and social studies, and that the school staff used grade seven materials for his work in reading and writing, for which he received special education support. See attached Special Education Annual Report, March 15, 2016, p.1. █████ received all A's and B's and had no discipline issues at High Horizons.

His teachers added that he "has continued to make great strides" in school, "participates actively," and "has a great sense of humor". They also commented that █████ "has made a lot of progress this year," as he has "become more open and articulates his thoughts very clearly." Of particular note is █████'s "A+" grade in math, due to his ability to "grasp math concepts easily and eagerly," such that he no longer needed math goals on his IEP. See attached Special Education Annual Report March 15, 2016. E.A.'s social worker added that he "has shown maturity in his ability to understand and handle stressful situations," and that "he is able to communicate his needs in an appropriate matter" while becoming "more outgoing and confident in social settings." See attached Social Work Summary March 15, 2016.

Immediately after the PPT at High Horizons on March 15, 2016, Joan Collins, █████'s special education teacher, accompanied █████'s mother to an Admissions PPT at Bullard Havens Technical School. █████'s mother and Ms. Collins noted that the CTHSS staff continued to review older documents when discussing █████'s needs, and would not consider his newest reports and the significant progress he had made over the 2015-2016 school year. Ms. Collins pointedly told the CTHSS team members that the work he produced was not individually modified for him in any way. Both Ms. Collins and █████'s mother felt that the group "had made up their mind before it even started." The CTHSS team ultimately denied █████ due to his placement in a "highly structured predictable environment with a low student to teacher ratio." The recommendation continued, "As a result [of this placement], the CTHSS cannot provide an appropriate program for the student's needs." See attached March 15, 2016 IEP.

At a June 13, 2016 PPT, BPS changed █████'s placement recommendation removing the recommendation for a "highly structured...environment," and maintaining the mainstreaming recommendations, with the inclusion of one period/day of resource room support. See attached June 13, 2016 IEP.

Undersigned counsel made the CTHSS counsel aware of the change in recommendations that occurred at the June 13, 2016 PPT. The CTHSS counsel informed the undersigned that "we do not believe that the revised IEP can be implemented at Bullard Havens without a fundamental alteration of the program. While Bridgeport now 'feels' that the Student can be successful at

Bullard, there is no evidence cited in support of this claim. Accordingly, there is no need to convene an additional meeting in this matter." *See attached* Email from Christine Chinni, Esq., to Kathryn Meyer, Esq., Center for Children's Advocacy, June 15, 2016.

██████

██████ is a thirteen-year-old BPS student who recently completed his 8th grade year at the Waltersville School. He is classified on his IEP as a student who is "Other Health Impaired" due to his diagnosis of Attention Deficit Hyperactivity Disorder ("ADHD"). His most recent IEP with program details describes a recommendation of one period/day of language arts special education support, to take place as a push-in service in his regular education classroom. Additionally, he received only thirty minutes of social work service "on a consultative basis" per month. *See attached* March 23, 2016 IEP. N.R.'s progress report from February 11, 2016, which aligned with his IEP goals, had all "Satisfactory" marks. *See attached* Progress Report for IEP Goals and Objectives, February 11, 2016. N.R.'s IEP only includes goals for Language Arts; he has no goals pertaining to any other academic subject or social/behavioral issues.

Additionally, ██████ has made marked progress in his ability to cope with his ADHD, as evidenced by reports in the record. His March 23, 2016 IEP notes, "He has shown significant improvements in his ability to control his impulses, which has led to improved social skills." Also mentioned is that ██████ is "polite and easily engaged... [and] has demonstrated improvements in school behavior." The IEP progress notes and teacher reports shared at the March 23, 2016 PPT, which was attended by CTHSS representative Martin DeFilippo, indicate that ██████ made major improvements during his eighth grade year. BPS staff even mentioned reducing his special education instructional hours and other supports because they were no longer needed.

On April 4, 2016, ██████'s mother received a call from Bullard Havens, saying that the school was conducting an Admissions PPT "now" and that the school intended to conduct the PPT "with or without [her]." ██████'s mother was very confused, as she had been told that the March PPT would suffice as an Admissions PPT. Despite this, ██████'s mother agreed to participate in the April 4, 2016 PPT by phone. During that PPT, the CTHSS staff characterized ██████ as "aggressive," which was shocking to ██████'s mother, and wholly unsupported by his school record. The CTHSS team at Bullard Havens concluded: "Student's need precludes participation in CTHSS program" due to the recommendation of "full-time programming with modifications, alternative tests, modified grades, worksheets, and tests for the 2016-2017 school year due to academic and behavioral difficulties (impulse control)."

██████

██████ is a Glastonbury Public Schools student, identified with "Specific Learning Disabilities." He is diagnosed with Dyslexia. W.D. took an Algebra I class for the first half of eighth grade. He

transferred into an alternative math class, an Algebra class at a slower pace, in January 2016. [REDACTED] receives daily academic supports and some paraprofessional support in Science.

The CTHSS convened an Admissions PPT at Cheney Technical High School on March 31, 2016. [REDACTED]'s mother felt that the admissions decision was predetermined before the PPT began. At the conclusion of the PPT, the CTHSS team determined that [REDACTED]'s needs precluded attendance because the CTHSS could not modify tests or grading and could not accommodate [REDACTED]'s needs for daily academic support. *See attached March 31, 2016 IEP.*

The Revised Admissions Policy in Practice:

The VRA implies that CTHSS will participate in a PPT convened by the student's sending school district team to offer guidance and information prior to the end of the student's eighth-grade school year. VRA §§ C.2-3 ("CTHSS will continue its practice of participating in IEP or Section 504 meetings for initially accepted applicants... CTHSS agrees that the main purpose of its participation in these meetings is to allow CTHSS to share its knowledge and expertise about CTHSS programming so that the team, as a whole, can assess what special education, and/or related aids and services must be provided to ensure the student will receive a free appropriate public education (FAPE) in the CTHSS school the following year.").

In practice, following the receipt of the Parent Return Statement and special education records, CTHSS invites parents/guardians to a PPT at the CTHSS. Upon information and belief, CTHSS inconsistently invites sending schools to Admissions PPTs. Admissions PPTs are also not regularly scheduled at times when sending school staff is available. For example, undersigned counsel attended a PPT in June 2015 for an applicant for the 2015-2016 ninth grade class. CTHSS had not invited the sending school. Counsel had the contact information for the sending school and ensured the participation by phone of staff with present knowledge of the student. Additionally, the Admissions PPT for [REDACTED] was scheduled during summer vacation. As a result, [REDACTED]'s sending school did not participate in her Admissions PPT.

As a result, the Admissions PPT sometimes proceeds without the participation of any regular education or special education staff members who have worked with, and have knowledge of, the applicant. In other instances, the Admissions PPT proceeds with CTHSS staff representatives who are unable to speak with knowledge of BLL supports, Assistive Technology supports, or specific trade requirements. As a result, the Admission PPT cannot answer sending school or parent questions about how CTHSS can meet a specific student's needs. In either circumstance, the Admissions PPT convenes without mandatory participants in violation of IDEA, 34 C.F.R. § 300.321, and is structurally deficient. *See, e.g., R.B. v. NAPA Valley Unif. Sch. Dist.*, 496 F.3d 932 (9th Cir. 2007), 48 IDELR 60. Thus, admissions decisions are made by individuals who have little to no familiarity with the applicant, or are made by staff who have limited knowledge of available supports.

The starting point of all discussions at the Admissions PPT is the Programming Considerations Chart, providing a side-by-side comparison of traditional high schools and the CTHSS. *See attached Programming Considerations Chart.*

In the course of reviewing the Programming Considerations Chart at the Admissions PPTs, the CTHSS representatives routinely stress that the CTHSS will NOT:

- modify curriculum or curricular materials,
- modify pace of instruction,
- modify programming or schedules, on a daily, semester, or yearly basis,
- modify instructional levels or sites for instruction,¹⁴
- modify testing or grading,
- offer Extended School Year (ESY) services.

A blanket refusal to consider these modifications violates the IDEA, Section 504, and the ADA. Moreover, the provision of such modifications should not automatically "preclude such student's participation in the vocational education program," which is the legal standard set by Conn. Gen. Stat. §§10-76q¹⁵ for the rejection of a special education student by the CTHSS and his/her referral back to his sending district for educational programming.

¹⁴ For example, all students are taught in mainstream classes by default. Pull-out instruction or resource room time is not offered as a part of a continuum of placements. *See attached CTHSS Supplemental Programs.* ("[CTHSS]' philosophy is to include all students within the general education setting. The PPT process determines the required services for identified students. The Special Education Department works to provide needed accommodations and services within the general education settings and technology areas through the use of collaborative and co-teaching models in line with educating students in the least restrictive environment.") At the Admissions PPT, if students require pull-out instruction or support in a resource room, the CTHSS generally determines that the student's needs "preclude such student's participation" in CTHSS. Conn. Gen. Stat. §10-76q(c).

¹⁵ "(a) The State Board of Education, in accordance with regulations adopted by said board, shall: (1) Provide the professional services necessary to identify, in accordance with section 10-76a, children requiring special education who are enrolled at state technical high schools, in accordance with section 10-95; (2) identify each such child; (3) determine the appropriateness of the state technical high school for the educational needs of each such child; (4) provide an appropriate educational program for each such child; (5) maintain a record thereof; and (6) annually evaluate the progress and accomplishments of special education programs at the state technical high schools.

(b) Where it is deemed appropriate that a child enrolled in a state technical high school receive special education, the parents or guardian of such child shall have a right to the hearing and appeal process as provided for in section 10-76h.

(c) If a planning and placement team determines that a student requires special education services which preclude such student's participation in the vocational education program offered by a technical high school, the student shall be referred to the board of education in the town in which the student resides for the development of an individualized educational program and such board of education shall be responsible for the implementation and financing of such program." Conn. Gen. Stat. § 10-76q.

In addition, at the Admissions PPT, the CTHSS representatives emphasize that the CTHSS academic/technical cycles provide only very limited opportunities for support, intervention, and re-teaching.

At the Admissions PPT, the CTHSS representatives underscore that students must enter CTHSS "Algebra-ready" for math instruction although there is no such requirement stated on the general application used by all students including those without disabilities. At the Admissions PPT, the CTHSS representatives also question sending school staff about the scope and content of their eighth grade math curriculum though there are no similar questions posed to all regular education teachers on the general application. Questions about performance level and the scope of content of curriculum only for students with disabilities thus constitute impermissible additional admissions criteria for students with disabilities.

The CTHSS representatives further stress at the Admissions PPT that pacing and curriculum modifications to Algebra math instruction will not be made for any student, even those with IEPs. *See, e.g., J.L.V. 5/10/16 IEP* ("[PPT] agreed it is not appropriate to place [REDACTED] in Algebra I curriculum *where standards can not be modified*... The team determined that an appropriate program can't be planned for [REDACTED] at Cheney Technical High School at this time.") (Emphasis added.) For example, at the Admissions PPTs, the CTHSS representatives underscore that the sole manner to demonstrate mastery of ninth grade Algebra at CTHSS is through successful completion of ALEKS, the on-line Algebra program utilized by the CTHSS, which must be completed by approximately November of their tenth grade year.¹⁶

At the Admission PPT, the CTHSS representatives work from an underlying assumption that accepted students are required to graduate in four years, in emphasizing deadlines to complete Algebra I, pacing of instruction, and the lack of modifications to pacing.¹⁷ Such a requirement is contrary to federal and state law. *See* 34 C.F.R. § 300.101(a), Conn. Gen. Stat. §§10-76d, 10-220. *See also* 34 C.F.R. §104.44 (for postsecondary vocational students, extended time to earn a degree is an example of reasonable modifications).¹⁸

In addition, the CTHSS representatives also express concern for an applicant's ability to tolerate the number of transitions in the CTHSS schedule, including the transition from academic cycle (2 weeks) to trade cycle (2 weeks), and then within the exploratory trade cycle. With each transition, students must adhere to rules and expectations set by different teachers, each with a

¹⁶ *See attached CTHSS Graduation Requirements.*

¹⁷ Per policy, a student may attend summer school "where available" or repeat a grade only "space permitting, after administrative review." Based on information and belief, more common in practice is that students who are not making expected progress, "exit and enroll in their local district." *See attached CTHSS Graduation Requirements.*

¹⁸ As to postsecondary students, federal regulations provide: "A recipient to which this subpart applies shall make such modifications to its academic requirements as are necessary to ensure that such requirements do not discriminate or have the effect of discriminating, on the basis of handicap, against a qualified handicapped applicant or student. Academic requirements that the recipient can demonstrate are essential to the instruction being pursued by such student or to any directly related licensing requirement will not be regarded as discriminatory within the meaning of this section. Modifications may include changes in the length of time permitted for the completion of degree requirements, substitution of specific courses required for the completion of degree requirements, and adaptation of the manner in which specific courses are conducted." 34 C.F.R. §104.44.

new set of classroom rules and expectations for a student to learn. The CTHSS representatives particularly question those students who are coming from a full or partial day self-contained program. There are no such questions on the general application to elicit information about how a regular education middle school student can handle the extent of transitions at the CTHSS, which exceed those of a regular education middle school student. The questioning of a student with disabilities about his or her ability to handle transitions is thus an impermissible additional admissions criterion that only applies to students with disabilities.

Following the review of the Programming Considerations Chart, the Admissions PPT delves into the student's Individual Education Plan ("IEP"), including the Present Levels of Performance ("PLOP") in math and reading, goals and objectives, modifications and accommodations, and hours of services. Given the line of questioning and tone at the Admissions PPT, it is apparent that CTHSS representatives have already made their decision on the application based on their prior review of the special education records.¹⁹ Below grade-level performance (despite English or Math grades) in reading or math, daily academic supports, or time in self-contained classrooms are all indicators that the student will be denied admission.

Summary and Conclusion

Based on these case examples, Complainants allege that the CTHSS applies its admissions policies in ways that discriminate against students with disabilities in violation of the ADA and Section 504 and the implementing regulations, and Conn. Gen. Stat. § 46a-75.

The Complainants contend that the CTHSS' admissions policy improperly excludes and has a discriminatory impact on students with disabilities in that it:

- 1- Imposes additional admissions criteria for students with disabilities in violation of the ADA and Section 504, and the implementing regulations; Guidelines IV.A and K; and VRA C.3.
- 2- Predetermines admission based solely on scores on norm-referenced tests for students with disabilities only, and in advance of any PPT meeting, making the PPT process both futile and misleading, in violation of 34 C.F.R. § 300.327 and § 300.501(e)(1).
- 3- Utilizes criteria that have not been demonstrated to be essential to participation in CTHSS, in violation of the ADA and Section 504, and the implementing regulations; Guidelines IV.K; and VRA B.3 and B.6.
- 4- Bases decisions on the ability of a student with disabilities to access the general education curriculum without reasonable modifications and accommodations, when failing to make reasonable modifications and accommodations is in itself discriminatory, and in violation of the ADA and Section 504, and their implementing regulations; and Guidelines IV.N.

¹⁹ See, e.g., attached State of Connecticut Department of Education Complaint No. 16-0452, filed *pro se* by [REDACTED] and Letter of Inquiry dated April 22, 2016 (noting that the parent "claims the ... PPT predetermined the outcome of a [PPT]").

The CTHSS discriminated against the following students specifically, in violation of the ADA and Section 504, in that it:

- Declined admission to [REDACTED], and [REDACTED] by applying an additional admissions criteria, i.e., being "Algebra-ready," which was a criteria not applied to regular education students applying to CTHSS,
- Refused to make modifications to pacing, curriculum, materials, classwork, homework, or tests in any way, and thus rejected applications for admission to [REDACTED], [REDACTED], and [REDACTED]
- Refused to take into consideration revised IEP recommendations for [REDACTED] and [REDACTED] and thus denied admission to these students based on outdated information, and
- Denied admission to [REDACTED] due to previous behavior that was a manifestation of [REDACTED]'s disability, ADHD, despite several teacher remarks of the improvement made during his eighth grade year.

Relief Requested:

Complainants request that OCR:

- 1- Investigate the CTHSS to determine whether the CTHSS' Revised Admissions Process is having a discriminatory impact on students with disabilities by denying or limiting admission to the CTHSS system to students by:
 - A. conducting a comprehensive review of all cases of students with disabilities who were denied admission for the 2016-2017 school year,
 - B. reviewing and providing undersigned counsel with the following: any written instructions to the CTHSS admissions staff or PPT/504 members concerning criteria for admissions of students with disabilities,
 - C. reviewing any complaints made against the CTHSS concerning discrimination or problems in the admissions process for students with disabilities, and
 - D. reviewing all reports and data already submitted to OCR pursuant to the May 2015 VRA.
- 2- Appoint an independent monitor to develop and oversee the creation and implementation of a new admissions policy and procedure for the CTHSS that will comply with the ADA and Section 504 of the Rehabilitation Act and will not have a discriminatory impact on students with identified disabilities.
- 3- Secure compliance from the CTHSS with the ADA and Section 504 of the Rehabilitation Act by requiring the CTHSS personnel to attend training sessions conducted by an agency/entity with expertise in educating students with disabilities in the technical high school system as identified by OCR.
- 4- Closely monitor any resulting agreements with the CTHSS to ensure compliance with the ADA and Section 504 of the Rehabilitation Act by conducting quarterly reviews of all students who are rejected from the CTHSS system through the PPT process.

- 5- Take any additional steps to remedy any unlawful conduct by the CTHSS as identified by OCR'S investigation or otherwise deemed appropriate by OCR.
- 6- Require the CTHSS to offer students [REDACTED], and [REDACTED] admission to the respective technical schools to which they applied. This admission offer shall follow a PPT meeting facilitated by each student's sending school district, during which time appropriate supports and modifications will be recommended to ensure student's success in the CTHSS environment.

Respectfully Submitted,



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