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November 14, 2025

By U.S. Mail & Email: [shuayung@gmail.com](mailto:shuayung@gmail.com)

Yang Xiong  
9052 Ancestor Dr.  
Elk Grove, CA 95758

Re: Prior Written Notice – Response to October 27, 2025 Parent Concerns Regarding 1:1 Paraeducator Services  
(Kaleb Xiong; DOB 3/13/2020)

Dear Mr. Yang Xiong,

I write on behalf of the Elk Grove Unified School District (“District”) regarding the offer of free appropriate public education (“FAPE”) outlined in the individualized educational program (“IEP”) dated 4/01/2025 for your child, Kaleb Xiong. On October 27, 2025, the District received an email from you summarizing a phone call wherein you raised several concerns regarding your child’s 1:1 paraeducator services, including a list of follow-up items and concerns on which you requested clarification. As required by law, this letter serves as the District’s prior written notice regarding your concerns, pursuant to Title 34 Code of Federal Regulations section 300.503.

### Background

The District convened Kaleb’s IEP meeting on April 1, 2025. At that meeting, the IEP team reviewed Kaleb’s present levels of performance; progress on previous goals; proposed new annual goals; service recommendations; the Adaptation Plan; and the offer of FAPE. The team also reviewed parent concerns related to Kaleb’s safety at home, differences in behavior between home and school, communication skills, sensory needs, and the application of skills across environments. The District responded by discussing observed differences between settings, explaining data collection and eligibility timelines, updating present levels to include parent concerns, incorporating recommendations from the California School for the Blind report where appropriate, collaborating with service providers, and outlining continued supports including specialized academic instruction, related services, and adult support based on safety and learning needs. Parents participated throughout the meeting, asked questions, and requested time to review the IEP before providing consent.

To support Kaleb in achieving the IEP goals, the IEP team, with your participation, agreed that Kaleb required the following special education and related services:

The team determined that Kaleb requires Specialized Academic Instruction in a separate classroom, Specialized Vision Services, Orientation and Mobility services, Adapted Physical Education, Occupational Therapy, and Speech and Language Therapy, delivered through a combination of direct instruction, consultation, modeling, and collaboration with classroom personnel. Kaleb also requires a range of supplementary aids and services, including sensory-related tools and strategies directed by the occupational therapist and access to specialized equipment such as a braille writer, tactile manipulatives, braille materials, and a white cane or Adaptive Mobility Device for safe mobility. The IEP team agreed that Kaleb needs 1:1 adult support throughout the school day. Additionally, consultation supports are required between the Teacher of the Visually Impaired, Orientation & Mobility Specialist, Speech-Language Pathologist, and classroom staff to adapt materials, plan instruction, and ensure consistent implementation of strategies across environments.

Between October 13–24, 2025, several communications occurred between the District and the family regarding Kaleb's daily routines, independence, and paraeducator support. During this period, the family and District began exchanging emails to discuss implementation of Kaleb's IEP, including supports for his 1:1 paraeducator and strategies to foster his independence. The special education teacher also spoke with the family in person to share updates on Kaleb's progress with increased independence and cane use, including photos and a video showing him smiling, laughing, and walking independently. On October 17, 2025, there was a staffing change involving the assigned paraeducator; although notice was not required, the teacher informed the family as a courtesy. These discussions were collaborative in nature and focused on ensuring Kaleb's safety, access to instruction, independence, and continuity of services.

On October 27, 2025, you contacted the District via email in follow up to a phone call you had with Special Education Director, Anne Rigali, in which you intended to summarize and clarify your discussion regarding Kaleb's 1:1 paraeducator services. Specifically, you indicated that your primary concerns were related to "the interruption, modification, and inconsistent implementation of Kaleb's IEP-mandated one-on-one paraeducator services."

Per your email, you indicated that Kaleb's teacher, Mrs. King, began modifying how Kaleb's paraeducator services were being provided. Specifically, you stated that in multiple communications, Mrs. King stated:

As part of promoting Kaleb's growth, we are encouraging him to engage more directly with teacher-led instruction. The paraeducator's role is to support instruction, not replace it. This means that at times I will work with Kaleb 1:1 while Ms. Motoko supports the class, and at other times she will provide his direct support...I want to reassure you that Kaleb's 1:1 paraeducator support, as outlined in his IEP, continues to be fully provided. We are also supporting his ongoing progress toward independence, which is embedded in all of his IEP goals. At times, this means making small adjustments to daily routines—such as encouraging him to stand next to his peers in line or waiting a few moments before his steps in - so he can practice self-regulation and confidence with familiar transitions. These brief moments are always monitored closely to ensure his comfort and safety.

You responded that you respectfully disagreed with Mrs. King's position and believe that the adjustments described in her communications altered the scope and immediacy of Kaleb's IEP-mandated services without parental consent in violation of 34 C.F.R. § 300.323(c)(2).

You further alleged in your email that Kaleb's previous paraeducator, Ms. Motoko, was removed as Kaleb's paraeducator without any IEP team discussion, prior notice, or immediate replacement, resulting in several days where Kaleb did not have a consistent 1:1 aide. You further alleged that even after the new paraeducator reassignment, communication from school staff remained inconsistent leading to uncertainty for you about who was providing Kaleb's 1:1 support, leading to a direct impact on Kaleb's IEP implementation and emotional stability including emotional distress and regression.

You concluded your email by outlining several issues which you requested the District prioritize before and during the upcoming IEP meeting, currently scheduled for November 18, 2025. Specifically, you requested clarification and administrative follow-up on the following issues:

1. Clarification regarding the October 17 removal of Ms. Motoko Welsh.
2. Current staffing and qualifications.
3. Consistency of 1:1 coverage.
4. Verification of IEP implementation from October 17-24, 2025.
5. Procedural safeguards against unilateral changes.

The District hereby responds to each of your requested issues below, which can be discussed further at the November 18, 2025 IEP team meeting.

Description of the Action Proposed or Refused by the District and Explanation of Why the District is Proposing/Refusing the Action

*1. Clarification Regarding the October 17, 2025 Removal of Ms. Motoko Welsh.*

Parent Concern: You requested clarification as to who authorized this change, the rationale for the decision, and to provide any related documentation.

District Response: Under the Individuals with Disabilities Education Act (“IDEA”), the District is responsible for ensuring that all supports and services outlined in a student’s IEP are properly implemented by qualified personnel. The District has the discretion to make staffing assignments and adjustments as needed, so long as the services described in the IEP continue to be implemented as written and provided by appropriately trained and qualified staff. (34 C.F.R. § 300.156(b).) The law does not require that the District receive parental consent to select or approve specific staff members who provide these services as a new staff assignment does not constitute a change in a student’s IEP.

The District understands that consistency is important and has made every effort to ensure a smooth transition and continued support for Kaleb.

*2. Clarification Regarding Current Staffing and Qualifications.*

Parent Concern: You requested, for record-keeping purposes, the name, start date, and daily schedule of the staff currently assigned to provide Kaleb’s 1:1 paraeducator support, and specifically who ensures consistent coverage. You also requested confirmation that the individual meets the training qualification requirements specified in Kaleb’s IEP and Adaptation Plan, including experience supporting students who are totally blind and have additional disabilities such as autism and global developmental delay.

District Response: As outlined above, the District is committed to ensuring that all supports and services outlined in a student’s IEP are implemented by qualified personnel at all times. However, the law does not require or authorize disclosure of individual staff members’ employment or personnel information to parents. While the law does not require disclosure of personnel information, we understand your interest in knowing who is working with your child, and as a courtesy, we can share that Kayla Johnson is currently assigned to work 1:1 with Kaleb. However, please note that we are unable to provide additional personnel details such as their start date or employment history, as that information is considered confidential employee information.

The District has continuously fulfilled its obligations by ensuring that all staff assigned to support its students, including Kaleb, meet all of the training qualification requirements necessary to support students with disabilities. Supervision and consistent coverage are managed by District administration in order to maintain fidelity of service delivery throughout the school day. While the District is unable to provide you with the individual personnel details you have requested, please be assured that the District has continued to remain fully compliant with providing Kaleb’s services in accordance with his IEP and for ensuring staff competency.

*3. Consistency of 1:1 Coverage*

Parent Concern: You requested that consistent 1:1 support coverage is maintained each day so that Kaleb’s safety and access to instruction remain fully supported. You noted observations that the paraeducator newly assigned to Kaleb has not been present with Mrs. King and her team during morning arrival, unlike Ms. Motoko, who was always present to greet Kaleb and the class, and has often arrived a few minutes late or only as the class is preparing to leave for their classroom. For example, on the morning of October 27, 2025, you believe she was late during the initial gathering period, and that her absence highlights an ongoing concern about the need for dependable, consistent, one-on-one coverage during the start of the school day.

District Response: The District can confirm that consistent with 34 C.F.R. § 300.323, subdivision (c)(2), all special education and related services have been made available to Kaleb in accordance with his IEP as soon as possible. While

occasional staff absences or transitions may occur, the District's obligation is to ensure that services are provided without material interruption, and that obligation continues to be met.

At no time has Kaleb's 1:1 support been discontinued and during the October 21, 2025 field trip Kaleb's teacher and paraeducators were present in order to provide support throughout the event. Again, while there is always a possibility that there may be short gaps in the provision of certain special education or related services due to transitions and staff changes, the District shall continue to provide Kaleb's services in conformity with his IEP in order to ensure that he continues to receive a FAPE.

#### *4. Verification of IEP Implementation from October 17-24, 2025.*

**Parent Concern:** You requested documentation confirming that Kaleb's IEP was fully implemented on each date during this period, including notes of any interim measures if service gaps occurred.

**District Response:** The District can confirm that all IEP services have been provided in accordance with Kaleb's IEP, consistent with the requirements of 34 C.F.R. § 300.323(c)(2), and any short-term absences or staffing transitions were addressed to maintain continuity of services.

#### *5. Request for Procedural Safeguards Against Unilateral Changes.*

**Parent Concern:** You requested an outline of the procedures the District follows to ensure that future staffing or services adjustments are reviewed by the IEP team prior to implementation and that the parents are properly notified.

**District Response:** As detailed above, the District may adjust staffing assignments as needed, as long as Kaleb's IEP services continue to be provided as written and by staff who are properly trained and qualified. (34 C.F.R. § 300.156(b).) Parental consent and notification are not required for specific staff assignments since changes in personnel do not alter the IEP itself.

Although notice and consent are not required for staff changes or immaterial interruptions in services, the District values collaboration and open communication and will continue to make every effort to keep you informed about Kaleb's progress and to communicate with you regularly regarding any questions or concerns you may have.

### **Description of Information Relied Upon in the District's Decision**

The District considered all available information in arriving at the decisions and recommendations above, including:

- Kaleb's school records and recent assessments;
- The 4/1/25 IEP documents;
- Your October 27, 2025 email outlining your concerns;
- Input from you and other members of the IEP team; and
- Professional observations, judgment, and input by credentialed District staff members.

### **Description of Other Options Considered by the District**

In making the above-detailed decisions, the District also considered other options, such as not responding to the administrative questions and concerns outlined in your October 27, 2025 email. However, the District believes it is important that your concerns are heard and that we are able to work collaboratively towards the development of an appropriate educational plan for Kaleb. Therefore, the District provides the above response to your requests and will address any additional questions or concerns you may have at the November 18, 2025 IEP meeting.

### **Description of Other Factors and Information Relevant to the District's Decision**

The District considered all of its obligations under state and federal law.

**Notice of Procedural Safeguards and Resources for Understanding those Rights**

As the Parents of a student who has a disability, you have the right to certain procedural safeguards, including the right to make informed decisions regarding your child's educational programming. We have included with this letter a copy of your rights and procedural safeguards under the IDEA. Please contact my office if you would like to schedule a time to meet to discuss any questions or concerns you have regarding this letter or your rights.

You may also contact the following agencies to obtain assistance in understanding your rights:

California Department of Education  
1430 N Street, Suite 2401  
Sacramento, CA 95814-5901

If you have any questions or concerns about anything contained in this letter, please do not hesitate to contact me.

Sincerely,



Michelle Wallner  
Coordinator  
Elk Grove Unified School District

Enclosures: Procedural Safeguards

4/1/25 IEP  
11/18/25 Meeting Agenda