

# EXHIBIT AP — PWN COMPLIANCE MATRIX

## Prior Written Notice dated November 14, 2025

**Delivery clarification incorporated:**

PWN dated **November 14, 2025**; emailed **November 17, 2025**; **not received by mail**; provided **less than 24 hours** before the District’s proposed **November 18, 2025 IEP meeting**.

IDEA Requirement (34 C.F.R. §300.503)	Legal Requirement	Observed Deficiency	PWN Page / Section
§300.503(a) Timing of notice	Notice must be provided a reasonable time <i>before</i> the proposal or refusal	Delivered less than 24 hours before proposed IEP; insufficient time for review; mailing stated but not received	Header / delivery timing
§300.503(b)(1) Description of action proposed or refused	Clear identification of each action	Refusals embedded in narrative; no discrete identification of actions refused (e.g., staffing/proximity changes)	Page 2
§300.503(b)(2) Explanation of <i>why</i>	Fact-specific rationale	States legal conclusions (no FAPE interruption; staffing discretion) without explaining <i>why</i> service intensity was unchanged	Page 3
§300.503(b)(3) Information relied upon	Specific evaluations, records, or data	Lists only general categories (IEP, school records, staff observations)	Page 4
§300.503(b)(4) Options considered and rejected	Meaningful alternatives with reasons	Lists “not responding” as an option; no meaningful alternatives considered	Page 4
§300.503(b)(5) Other relevant factors	Disability-specific factors	Omits blindness-related safety risks, consistency needs, and parent concerns	Omitted
§300.503(b)(6) Procedural safeguards	Explain applicability	Safeguards attached but not applied to the specific refusals	Page 4
§300.503(b)(7) Sources for assistance	Identify help resources	Generally included	✓ Partial
§300.503(c) Understandable language	Clear, accessible notice	Legalistic and defensive; functions as post-hoc justification	Overall

**Summary (Exhibit AP):**

The November 14, 2025 PWN is **noncompliant as to both timing and content**. Its internal statement regarding mailing/emailing is inconsistent with actual delivery, and multiple required components under §300.503(b) are missing or insufficient.