

# EXHIBIT AQ — PWN COMPLIANCE MATRIX

## Prior Written Notice dated December 4, 2025

IDEA Requirement (34 C.F.R. §300.503)	Legal Requirement	Observed Deficiency	PWN Page / Section
§300.503(a) Timing of notice	Notice must precede proposal or refusal	Document functions as a post-hoc defense of prior actions and refusal to issue earlier PWN	Pages 3–4
§300.503(b)(1) Description of action proposed or refused	Clear identification of actions	Multiple refusals (IEP meeting, home services, implementation issues) embedded in narrative	Pages 2–5
§300.503(b)(2) Explanation of <i>why</i>	Fact-specific rationale	Asserts conclusions (“continuous supervision,” “flexibility”) without explaining <i>why</i> changes do not alter intensity or immediacy	Pages 2–3
§300.503(b)(3) Information relied upon	Specific records or data	Lists generalized categories; no specific logs, data, or reports identified	Page 5
§300.503(b)(4) Options considered and rejected	Meaningful alternatives with reasons	Lists abstract considerations (training, agenda development) rather than alternatives to disputed actions	Page 5
§300.503(b)(5) Other relevant factors	Disability-specific factors	Conclusory statement (“considered obligations”) without analysis of blindness-related safety risks	Page 6
§300.503(b)(6) Procedural safeguards	Explain applicability	Safeguards attached but not applied to the specific refusals	Page 6
§300.503(b)(7) Sources for assistance	Identify help resources	Generally included	✓ Partial
§300.503(c) Understandable language	Clear, accessible notice	Lengthy, legalistic, defensive	Overall

**Summary (Exhibit AQ):**

The December 4, 2025 PWN independently fails multiple **content requirements** under §300.503 and reinforces a **post-hoc notice practice**, rather than curing the deficiencies of the earlier PWN.