

SUMMARY INFORMATION

SPECIAL EDUCATION STATE COMPLAINT

Department of Education

MAR 25 2013

SUMMARY INFORMATION

Office of Special Education
Program Accountability

Date: March 25, 2013

This Complaint alleges East Grand Rapids Public Schools has violated 42 requirements of the federal regulations regarding Part B of the Individuals with Disabilities Act ("the Act") and the *Michigan Criteria for Determining the Existence of a Specific Learning Disability* (Michigan Criteria), which represents the criteria adopted by the State of Michigan's pursuant to § 300.307(a) of the Act and with which East Grand Rapids Public Schools must comply pursuant to § 300.307(b).

Although many alleged violations of the Michigan Criteria substantial mirror respective alleged violations of the federal regulations, such alleged violations of the Michigan Criteria are also included because (1) they are indeed separate violations, and (2) because they illustrate EGRPS would have been (and was) sufficiently aware of numerous, substantial, and egregious violations merely by consulting the Michigan Criteria. As noted in alleged violation 42, these alleged violations represent willful and wanton conduct, demonstrate repeated intentional disregard for the federal regulations and Michigan Criteria, and include EGRPS' false certification of its SLD Policy.

The alleged violations herein regard East Grand Rapids Public Schools' *Procedures for Determining a Specific Learning Disability* (EGRPS SLD Policy), which was instituted on or before September 1, 2010 and continues in effect to present day. Accordingly, these are present and ongoing violations occurring within one year of the date of this Complaint.

Complainant requests the Michigan Department of Education independently investigate these alleged violations and not delegate such investigation to Kent ISD for the reasons noted Request for State Investigation section of this Complaint.

Name of Schools: All East Grand Rapids Public Schools
St. Stephen Catholic School (740 Gladstone SE, East Grand Rapids)

School District: East Grand Rapids Public Schools

Students Affected: All

Complainant:

Complainant Signature: