

**State of New Jersey**  
OFFICE OF ADMINISTRATIVE LAW

**DECISION**

OAL DKT. NO. EDS 01729-16

AGENCY DKT. NO. 2016 23884

**E.T. AND M.T. ON BEHALF OF V.T.,**

Petitioners,

v.

**MONROE TOWNSHIP BOARD OF  
EDUCATION,**

Respondent.

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**Craig David Becker**, Esq., for petitioners

**Patrick Madden**, Esq., for respondent (Madden and Madden, P.A., attorneys)

Record Closed: May 4, 2018

Decided: June 6, 2018

BEFORE **PATRICIA M. KERINS**, ALJ:

**STATEMENT OF THE CASE**

Petitioners E.T. and M.T. filed this Petition for Due Process on behalf of their minor child, V.T. They dispute the appropriateness of special education services provided to V.T. by respondent Monroe Township Board of Education (Monroe). They seek increased behavioral support services for their son, further mainstreaming opportunities, and an award of compensatory education.

**PROCEDURAL HISTORY**

Petitioners filed their due process request on January 7, 2016, with the Office of Special Education Programs (OSEP) of the New Jersey Department of Education (Department). The matter was transmitted to the Office of Administrative Law (OAL) for a hearing on February 3, 2016, and on February 18, 2016, a settlement conference and a prehearing conference were held. Testimony was taken on April 11, 2016, June 22, 2016, August 23, 2016 and October 18, 2016. The record remained open for post hearing submissions by the parties.

## **FACTUAL DISCUSSION**

### **General Background Facts**

V.T. was born in October 2005 and receives special education services from Monroe with a diagnosis of autism. For most of his elementary school years he has been placed in an in-district self-contained program. In first grade (2012-13 school year) V.T. was provided with mainstream components in his program but toward the end of the year Monroe moved to end those opportunities citing V.T.'s behavioral issues. After petitioners filed for due process, the issue was settled through mediation. As a result, V.T. was provided with a mainstream art class and Monroe completed new evaluations of V.T., including a Functional Behavioral Assessment (FBA), resulting in an update of V.T.'s Behavioral Intervention Plan (BIP) in the fall of 2013. By the time the parties met for V.T.'s Individual Education Program (IEP) meeting in April 2015, no changes had been made to his BIP, and his behaviors remained an issue.

Petitioners then retained the services of a behaviorist and educational consultant, Rebecca Zegas, who observed V.T. in Monroe's program. Zegas provided reports to Monroe in August 2015 and November 2015. Zegas recommended that Monroe provide behavioral consultations for at least an hour a week to monitor and deal with V.T.'s behavioral issues and that Monroe provide compensatory education. In response Monroe advised that behavioral services meeting V.T.'s needs were part of its overall program and that compensatory education was not needed. In addition, Monroe did not agree to increase V.T.'s mainstream opportunities, again citing his behavioral issues. Those issues included verbal disruptions, noncompliance, verbal stereopathy, scripting,

stimming (J-25) and darting. Monroe did update V.T.'s BIP, however, in early 2016 after petitioners filed for due process on the issues of behavioral services, mainstream opportunities and compensatory education.

### **Testimony and Documentary Evidence**

The parties placed in evidence Joint Exhibits 1 through 53. The documents included records relating to V.T. from 2010 through 2016, consisting of, among other things, IEPs, progress reports, assessments and evaluations.

In support of its case, Monroe presented the testimony of Stephanie Belsanti, a Monroe school psychologist, Kristina Wetzal, a Monroe special education teacher, Brian McConnell, a behavior consultant for DiNovi Associates, the contractor providing behavioral services to Monroe, and Monroe's Director of Special Education John Bersh. In addition it placed in evidence documents R-1 to R-35.

Stephanie Belsanti (Belsanti) is a school psychologist with Monroe and a case manager for its in-district autism program. She was qualified as an expert in the education of autistic students and as a behavior analyst. In September 2014, she became V.T.'s case manager. She described Monroe's program for V.T. as self-contained and highly structured, with five (5) students, one teacher, two paraprofessionals and a one to one aide for another student in his classroom. Based on evaluations done in 2013, she placed V.T. in the "mildly delayed" range of autism, with reading skills better than most. He is taught on the first grade level. She testified that he was not mainstreamed due to his behaviors and further, that his behaviors impede his academic performance and progress.

Belsanti described the behavioral supports in place for V.T. under the BIP prepared by Brian McConnell (McConnell) of DiNovi Associates. She stated she collaborated with McConnell, who was available to consult on V.T.'s plan and who is usually present in V.T.'s class once a week. She herself is present in his classroom for a period on Thursdays and is available to respond to his teacher's concerns. She stated that McConnell prepares graphs of V.T.'s behaviors based upon data provided by the

classroom staff, in particular the paraprofessional. While she assumed McConnell is in V.T.'s class at least once a week, his schedule is discretionary and subject to collaboration with classroom staff and Belsanti herself. She could not state how often McConnell worked directly with V.T. or worked on his BIP implementation. As for V.T.'s academic progress, she cited the results of the Diagnostic Learning Maps (DLMs), a new tool used in New Jersey schools in place of PAARC testing for cognitively impaired students. It is administered with an IPAD and with the assistance of a teacher. Progress reports for V.T. are prepared by teachers based upon their own data collection. Belsanti stated she had not reviewed the underlying data used to determine V.T.'s progress or lack thereof.

With regard to the implementation of V.T.'s behavioral plan, Belsanti said that while no changes had been made to the 2013 plan until 2015, "tweeks" were made to it by the classroom staff charged with implementing it. She disagreed with Zegas' recommendation regarding compensatory Applied Behavioral Analysis (ABA) therapy for V.T., describing ABA as a "medical model" for adults.

Belsanti's testimony was followed by that of Kristina Wetzel (Wetzel), V.T.'s special education teacher. She described V.T. as a pleasant and empathetic child whose behaviors nevertheless prevent him from being mainstreamed. His exposure to general education students is limited due to his self-contained classroom. Additionally, he even eats lunch with his own classmates. She uses her own behavior board in the classroom to track his behaviors and consults with McConnell on an as needed basis. With regard to V.T.'s behaviors she testified that she recently observed a lessening of his vocal disruptions and that he was more attentive, not needing as much redirection. She asserted that there also was less task refusal, darting and mouthing on V.T.'s part. She further testified that she saw academic progress by V.T., with his reading skills overall better than his math. He does require prompting during his academic lessons and assignments and she did not present objective data regarding his progress.

Brian McConnell then testified for Monroe. Employed by DiNovi Associates, Monroe's behavioral services contractor, he is a Board-Certified Behavior Analyst (BCBA). The parties stipulated to his qualifications as an expert in Behavior Analysis

(BA) and he described the parameters of Monroe's self-contained program and his role in it. For the 2015-16 school year he spent eighteen (18) hours a week at the various classes in the program, spread out over all of the classes. In prior years the hours varied. On a given day at Monroe he would make the rounds of the classes and consult with the staff regarding any issues they saw with a given child's behaviors.

His interaction with V.T. included the preparation of the 2013 Functional Behavior Analysis (FBA) referred to above. After collecting ABC (Antecedent Behavior Consequence) data on V.T., particularly after concerns arose over his vocal disruptions and darting behaviors, he worked with staff on implementing behavior interventions, including training. His work with V.T. varied over the years, depending upon the child's needs and whether classroom staff reached out to consult him. The interventions included the use of a token economy system for V.T. While he noted variability in his behaviors, overall he said he saw an improvement in his behaviors, particularly during the 2015-16 year. While behaviors are tracked for frequency, the data does not factor in either intensity or duration of the behaviors. As with Belsanti and Wetzal, he agreed that V.T.'s behaviors negatively affect his academic progress. He further stated that he had not been part of discussions concerning mainstreaming V.T.

When questioned concerning the "integrity checks" on the implementation of the BIP which he recommended in the FBA leading up to the BIP, McConnell admitted that he had no set schedule for such checks, and assumed that school staff would implement them.

The final witness presented by Monroe was its Director of Special Services, John Bersh (Bersh) who described Monroe's in-district program for autistic students. The program has seven classes at Holly Glen Elementary School with approximately six (6) students in a class. He described how the behavioral support services are "infused" into the program with individual services such as a one to one aide provided as necessary. He was familiar with V.T., whom he described as having a moderate level of autism. However, he testified that while V.T.'s behaviors stood in the way of mainstreaming, they did not require further behavioral services than those already provided by Monroe. In fact, he asserted that V.T.'s behaviors did not require much attention from his staff. He

further asserted that Monroe's program provides services beyond what the New Jersey Administrative Code requires and that support services beyond the school day were the responsibility of other agencies.

In response petitioners presented the testimony of their expert witness, Rebecca Zegas, and petitioners M.T. and E.T. Additionally they placed in evidence exhibits P-1 through P-16. Zegas was qualified as an expert in Behavior Analysis and Special Education and is a BCBA. In her testimony she reviewed the reports (P-3 and P-4) she had written after her observations of V.T. and her review of his IEPs and BIPs. As with respondents' witnesses she opined that V.T.'s behaviors impede his learning. Noting that in autism behaviors are key, she said that controlling V.T.'s behaviors is crucial to his ability to learn. Simply put, dealing with his behaviors is actually part of his education.

Zegas testified to the reports and data she reviewed in preparing her reports as well as her observations of V.T. in the classroom and in outside testing settings. In her testimony she discussed his behavioral problems, social skills deficits and academic levels. In her opinion his behavioral issues impede both his academic progress as well as a move to a less restrictive educational setting. In reviewing his records she opined that Monroe's failure to modify his BIP, during the years at issue, to deal with his behaviors impeded the progress he could have made academically and socially.

Zegas opined that she observed a high level of prompting by staff and cited the lack of a targeted motivational system to deal with his behaviors. Stressing the need for generalization of skills, and citing it as a key element in his program she found his program to be deficient. Unlike Belsanti she saw the efficacy in using ABA therapy principles for dealing with V.T.'s behavioral issues.

Citing the behavior charts maintained by Monroe for V.T., she noted that his behavior was erratic and at a level high enough to significantly impede his learning. In particular she discussed his mouthing behaviors and how concerning they are and the manner in which they impede his ability to learn. She noted that it was imperative that his behavioral plan be reviewed and updated on a continual basis to make it effective. In

particular she opined that behavioral services should be provided on a scheduled, continual basis rather than on a reactive “as needed” basis.

In her testimony Zegas discussed the changes made to V.T.’s behavioral plan after the filing of the due process action in early March 2016. Some of his behaviors decreased but she attributed such changes to an increased proximity of staff to V. T. as well as a change by Monroe in the definitions used for his maladaptive behaviors. While such changes may have reduced some of his behaviors, they did not address the underlying maladaptations. A child might be less likely to dart away or refuse a task with a staff member by his side, however, he then must be taught appropriate behaviors in place of the maladaptive ones. She further noted that during the same period he continued to engage in high rates of other maladaptive behaviors such as mouthing, vocal disruption, and vocal stereotype or stinping.

Zegas also addressed the goals and objectives in V.T.’s IEPs. She found them to be vague and immeasurable, and not capable of generating the data necessary to adequately determine whether he was making progress. The goals lack baseline data and are based upon subjective criteria such as a teacher’s opinion. Further, a review of the data shows that in general V.T. is merely progressing gradually or satisfactorily, not that he has achieved an actual goal. Nor do his goals adequately address his maladaptive behaviors, a key component in his ability to learn and make progress.

In responding to Monroe’s ascertain that V.T. had made academic progress based on his performance on the DLMS, she discounted those tests as a barometer of his progress. She noted that the DLMS have only been used for a few years and as of yet there is no peer review research on their performance. In contrast she cited the test scores obtained independently by petitioners (P-5 and P-7) which show his academic achievement to remain low. She also noted that Monroe’s use of prompts with V.T. can impair a true assessment of his academic progress.

Zegas opined that by February 2014 V.T.’s BIP should have been updated to deal with his behaviors. In her opinion weekly behavior consults should have been implemented to address his behaviors and the manner in which staff was addressing

those behaviors. Such behavioral consultations would have provided a vehicle for the review of data and for the BCBA to interface directly with staff on a consistent basis regarding V.T. The failure to do so impeded V.T.'s progress denying him FAPE. In addition to such consultations, Zegas recommended more detailed goals and objectives and an award of compensatory education in the amount of eighty to one-hundred hours of behavioral services to be provided at the home of petitioners.

Petitioners, E.T. and M.T. also testified. M.T. is V.T.'s mother and she described him as an affectionate and loving child who was diagnosed with autism at three years of age. While he can be smart and fun and loving and imaginative, his behavioral difficulties include verbal stims, darting, and difficulty with socializing. She described working on academics with him at home, but she has difficulty getting him to focus. She finds he rarely uses language with his peers. Although he was mainstreamed in first grade, he was placed in a more restrictive environment by second grade. She described being happier with his third-grade teacher, rather than his first and second grade teacher, and expressing her thankfulness in an email to staff. However, she testified that the improvement in teaching still did not obviate her concerns over his progress and the need for consistent behavioral services to deal with his maladaptive behaviors. She testified that his behaviors at home also included infrequent banging of his head and placing pressure on his face by pulling at it.

V.T.'s father, E.T. corroborated his wife's testimony. He too wishes more maintaining for his son but realizes his behaviors impact his learning experience. He noted that V.T. shows an aptitude in art and music, and feels he can read but not comprehend all that he is reading. He felt that the failure to set targets for his son's behaviors was detrimental to his ability to progress.

In reviewing the testimony and exhibits submitted in this matter it was the testimony of petitioners' expert, Zegas, which was the more credible in key areas. She was direct and articulate, and more comprehensively discussed the relationship between V.T.'s behaviors and his ability to learn and progress. In addressing the issue of whether he had made progress academically, her conclusion that he had made little or no progress was buttressed by the data in the record. His IEPs and test scores (P-5 and P-7) show



him below grade level, and his progress reports show him attaining few if any goals. While the DLM test results show some results placing him at grade level, those results are at odds with other data. Significantly, the efficacy of the DLM as a testing vehicle has not yet been validated by peer review. Her testimony regarding the lack of specificity and failure to establish baseline data and specific performance criteria and measurements in V.T.'s goals and objectives was corroborated by a review of those goals and objectives, as well as the teacher reports charting his progress.

Similarly, her conclusions regarding deficiencies in his BIP were buttressed by the data in the record regarding his maladaptive behaviors. Little progress has been made regarding his behaviors and the tracking data did not factor in intensity and duration of the behaviors. Further, the data shows neither regular integrity checks nor scheduled BCBA consultations.

The testimony of Belsanti and Wetzel, was descriptive of V.T.'s behaviors and their methods of tracking his progress and dealing with his behaviors. McConnel also was factual regarding his dealings with V.T. While he saw behavioral progress in certain areas in the 2015-16 school year, neither he nor Belsanti and Wetzel denied that V.T.'s behaviors remained an impediment to his progress and mainstreaming. As for Bersh, his testimony regarding Monroe's autism program with its imbedded behavioral supports placed V.T.'s program in context. None of respondent's witnesses however were as detailed or comprehensive in their discussion of how V.T.'s goals and objectives, as well as his BIP provisions, were rooted in specific criteria and the use of baseline data.

Based on the record before me therefore, I **FIND** that from January 2014 through the 2015-16 school year V.T. made minimal or no progress in attaining his goals and objectives in his IEPs. Further I **FIND** that those goals and objectives were not specific enough nor grounded in baseline data to enable him to achieve. With regard to the BIP in place during that same period I **FIND** that it was not sufficient to deal with his maladaptive behaviors.

### **LEGAL DISCUSSION AND CONCLUSION**

This matter was brought under the provisions of the Individuals with Disabilities Education Act (IDEA), 20 U.S.C. 1400 et seq. In New Jersey public school districts must provide a free and appropriate education (FAPE) under both state law and the IDEA to students classified for special education services. Such services are set forth in a student's Individualized Education Program (IEP). Under N.J.S.A. 18A:46-1.1, the school district has the burden of proof and production whenever a due process hearing is held under the law.

The United State Supreme Court had recently provided guidance on how to determine whether a child has been provided FAPE. In Endrew F. v. Douglas Cnty. Sch. Dist., 580 U.S. \_\_\_\_\_, 137 S.Ct. 988 (2017), the Court stated:

That the progress contemplated by the IEP must be appropriate in light of the child's circumstances should come as no surprise. A focus on the particular child is at the core of the IDEA. The instruction offered must be "specially designed" to meet a child's "unique needs" through an "individualized education program."

The petitioner in that matter was diagnosed with autism at age two and was described as a humorous child with a sweet disposition but who exhibited multiple behaviors that inhibited his ability to access learning in the classroom. The Court noted that his IEPs largely carried over the same basic goals and objectives from one year to the next, indicating that he was failing to make meaningful progress. After his parents challenged the IEP proposed for him, the matter proceeded through federal courts after they were denied relief in the administrative forum. In reviewing the case, the Supreme Court rejected the decision of the lower courts that his IEP was sufficient to show a pattern of at least minimal progress. Instead the Court emphasized that the IDEA requires a focus on the unique needs of a given child, providing him or her with "an educational program reasonably calculated to enable a child to make progress appropriate in light of the child's circumstances."

Applying the above holding to the within matter, it is clear that Monroe failed to provide petitioner V.T. with an IEP during the years at issue which adequately addressed his unique needs. The failure to promptly address his escalating behavioral issues

impeded his ability to learn, restricting his potential to progress academically, as well as to achieve life skills and improve socialization. As with Andrew F., V.T. is autistic with behaviors which impaired his ability to learn. As a result, his IEP needed to be tailored to his unique needs. While Monroe's program is laudable in that it attempts to infuse behavioral supports within its program, it failed to adequately address V.T.'s needs for additional behavioral interventions and failed to provide him with FAPE. The Supreme Court in Andrew F. rejected a one size fits all approach to the provision of FAPE, emphasizing the special needs of each unique child. Here Monroe failed to reach inside the parameters of its program and provide V,T. with the additional behavioral supports he required. The IDEA requires devising a program to meet the needs of the child rather than requiring the child to fit within the confines of a given district program.

There is no dispute between the parties that V.T.'s behaviors are an impediment to his learning and to his opportunities for mainstreaming. The dispute is over how to devise a program for him that provides him the supports and services he needs to make progress, behaviorally, academically and socially. In this matter the remedies requested by petitioners are quite simple. They are requesting additional behavioral supports for their son by Monroe's BCBA consultant. They ask that he or she provide services specific to V.T. at least once a week. Additionally, they seek compensatory services for the period in which he was not provided FAPE in the amount of eighty to one hundred hours per year to be provided in a home program based on ABA therapy. Their requests are appropriate and supported by the record.

### **ORDER**

Based on the foregoing the following is **ORDERED**:

- Respondent shall provide V.T. with at least one hour per week direct behavioral consultations with a BCBA and shall revise his Behavioral Intervention Plan accordingly.
- Petitioners and respondent shall immediately hold an IEP meeting to amend V.T.'s Behavioral Intervention Plan consistent with the above Order.

- V.T.'s goals and objectives in his IEP shall be revised to set forth criteria specific to his unique needs consistent with this decision and
- Petitioners are awarded eighty hours of compensatory services yearly for the period January 2014 through January 2016. Those services shall consist of a home program for V.T. based on the principles of Applied Behavioral Analysis to deal with his behaviors.

This decision is final pursuant to 20 U.S.C. § 1415(i)(1)(A) and 34 C.F.R. § 300.514 (2017) and is appealable by filing a complaint and bringing a civil action either in the Law Division of the Superior Court of New Jersey or in a district court of the United States. 20 U.S.C. § 1415(i)(2); 34 C.F.R. § 300.516 (2017). If the parent or adult student feels that this decision is not being fully implemented with respect to program or services, this concern should be communicated in writing to the Director, Office of Special Education Programs.

June 6, 2018  
\_\_\_\_\_  
DATE

\_\_\_\_\_  
**PATRICIA M. KERINS, ALJ**

Date Received at Agency

June 6, 2018 (emailed)  
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Date Mailed to Parties:

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**APPENDIX**

**WITNESSES**

**For Petitioners:**

Rebecca Zegas

M.T.

E.T.

**For Respondent:**

Stephanie Belsanti

Kristina Wetzel

Brian McConnell

John Bersh

**EXHIBITS**

**Joint:**

- J-1 December 15, 2015 Program Evaluation Review by Child Study Team
- J-2 June 17, 2010 Child Development Evaluation by Dr. Kruger
- J-3 March 13, 2011 Psychological Evaluation by Child Study Team
- J-4 April 12, 2011 Preschool Pediatric Program Initial Evaluation
- J-6 June 8, 2011 Neuropsychiatric Evaluation by Dr. Oasin
- J-7 June 15, 2011 IEP
- J-8 May 16, 2012 IEP
- J-9 October 5, 2012 IEP
- J-10 March 23, 2013 Progress Report
- J-11 May 31, 2013 IEP
- J-12 July 25, 2013 IEP
- J-13 July 25, 2013 Reevaluation Plan
- J-14 August 1, 2013 IEP

- J-15 September 19, 2013 Physical Therapy Evaluation by Child Study Team
- J-16 October 4, 2013 Psychologist Evaluation by Child Study Team
- J-17 October 8, 2013 Educational Evaluation by Child Study Team
- J-18 October 8, 2013 Social History Evaluation by Child Study Team
- J-19 October 9, 2013 Speech and Language Evaluation by Child Study Team
- J-20 October 10, 2013 Functional Behavioral Assessment by DiNovi
- J-21 October 11, 2013 Occupational Therapy Evaluation by Child Study Team
- J-22 October 30, 2013 IEP

**For Petitioner:**

- P-1 August 19, 2015 Program Evaluation by Rebecca Zegas, MA, BCBA
- P-2 CV of Rebecca Zegas, MA, BCBA
- P-3 November 11, 2015 Program Evaluation by Rebecca Zegas
- P-4 December 29, 2015 Program Evaluation Addendum by Zegas
- P-5 February 15, 2016 Assessment Report by Victoria Schwartz
- P-6 CV of Victoria Schwartz
- P-7 February 15, 2016 Education Assessment by Allyn McLaughlin, M.Ed.,  
NCED
- P-8 CV of Allyn McLaughlin
- P-9 February 17, 2016 Educational Testing Report by Rebecca Zegas
- P-10 July 16, 2012 Psychodevelopmental Evaluation by Sarah Woldoff
- P-11 Correspondence to District's Counsel
- P-12 March 30, 2015 Emails regarding DiNovi Seminars
- P-13 Definitions from BCBA Ethical Guidelines
- P-14 March 15, 2016 Program Evaluation Addendum by Rebecca Zegas
- P-15 Recordings of IEP Meetings – May be played if Necessary to Clarify  
Transcripts of Meetings
- P-16 Finalized IEP for V.T.

**For Respondent:**

- R-1 Email from M.T. to Special Education Teacher dated June 18, 2015
- R-2 Progress Report dated March 30, 2016

- R-3 Dynamic Learning Maps V.T. Individual Student Year-End Report – Mathematics (November 11, 2015)
- R-4 Dynamic Learning Maps V.T. Individual Student Year-End Report – English Language Arts (November 11, 2015)
- R-5 Dynamic Learning Maps End of Year School Results 2014-15 dated September 16, 2015 Identifying Results of V.T. and Similarly Situated Classmates
- R-6 Dynamic Learning Maps Accessibility Manual 2014-15
- R-7 New Jersey DLM Test Security Agreement Signed by Alison Mancini
- R-8 DLM Teacher Guide
- R-9 DLM Parent Guide
- R-10 Binder of Student Work Examples (Produced by Kristina Wetzel)
- R-11 Reading Workbook B (Produced by Kristina Wetzel)
- R-12 Reading Workbook C (Produced by Kristina Wetzel)
- R-13 V.T. Classroom Journal (Produced by Kristina Wetzel)
- R-14 V.T. Student Detail Report – Math (Produced by Kristina Wetzel)
- R-15 Stephanie Belsanti Curriculum Vitae
- R-16 Kristina Wetzel Curriculum Vitae
- R-17 Brain McConnell Curriculum Vitae
- R-18 Brett DiNovi Curriculum Vitae
- R-19 John Bersh Curriculum Vitae
- R-20 Brett DiNovi Report
- R-21 Stephanie Belsanti Evaluation/Report Review of Rebecca Zegas September 29, 2015 Report (December 3, 2015)
- R-22 Evaluation/Report Review of Stephanie Belsanti Reviewing the December 29, 2015 Report Rebecca Zegas (January 8, 2016)
- R-23 September 14, 2015 Evaluation/Report Review of Rebecca Zegas Report of June 4, 2015
- R-24 September 14, 2012 Report – Review of Sara Woldoff Evaluation of July 16, 2012
- R-25 Zegas-T. Emails
- R-26 Zegas Seminar Materials from Camden County Bar Association Seminar
- R-27 2015-16 Behavior Graphs from the District’s Records (as of April 7, 2016)

- R-28 2015-16 Compilation of Behavior Data from the District's Records (as of April 7, 2016)
- R-29 Behavior Graphs and Data Maintained by the District for 2015-16 (as of the end of the school year)
- R-31 Autism Class Consultation Log (for V.T.'s Classroom)
- R-32 Limitless Behavioral Services and Consulting, L.L.C Facebook Review Page
- R-33 Rebecca Zegas Facebook Review of Limitless Behavioral Services and Consulting, L.L.C.
- R-34 Rebecca Zegas Facebook post of February 10, 2015
- R-35 Rebecca Zegas Email Exchange with John Bersh, August 2015