Division of Elementary and Secondary Education - Office of Special Education
Advisory Council for the Education of Children with Disabilities
Dispute Resolution, July 2025

The following allegations were addressed in due process hearing decisions and complaint investigation reports completed in the previous quarter. An issue that has been substantiated by facts as determined by a due process hearing officer or complaint investigation team is followed by (S). An issue in which one or more allegations were substantiated while other allegations were not will be marked as partially substantiated (PS). An issue that was not substantiated is followed by (NS). Rendered decisions found to have no corrective action are followed by (No C/A).

DUE PROCESS HEARING ISSUES

H-25-15

1. Failure to comply with provisions set forth in Part B of the Individuals with Disabilities Education Act (IDEA). Specifically, by failing to provide a free appropriate public education (FAPE). (NS)

H-25-26

1. Failure to comply with provisions set forth in Part B of the Individuals with Disabilities Education Act (IDEA). Specifically, by failing to provide a free appropriate public education (FAPE). (S)

OPEN HEARINGS
(26)

Case#	School District	Status
2024		
H-24-04	LRSD	Pending Compliance
H-24-10	Magnet Cove SD	Pending Compliance
H-24-34	Scholarmade Achievement SD	Pending Compliance
H-24-40	Vilonia SD	Pending Compliance
H-24-42	Springdale SD	Pending Hearing
H-24-46	Benton SD	Pending Compliance
2025		
H-25-01	Hope SD	Pending Hearing
H-25-09	PCSSD	Pending Hearing
H-25-14	Gravette SD	Pending Hearing
H-25-18	Gravette SD	Pending Hearing

H-25-20	PCSSD	Pending Hearing
H-25-22	Fountian Lake SD	Pending Hearing
H-25-24	LRSD	Pending Hearing
H-25-26	Batesville SD	Pending Compliance
EH-25-29	Bentonville SD	Pending Hearing
H-25-32	Palestine-Wheatley SD	Pending Hearing
H-25-36	Gravette SD	Pending Hearing
H-25-38	Clarendon SD	Pending Hearing
H-25-39	Rogers SD	Pending Hearing
H-25-40	Jacksonville Pulaski North SD	Pending Hearing
H-25-41	PCSSD	Pending Hearing
H-25-42	PCSSD	Pending Hearing
H-25-43	Mountain View SD	Pending Hearing
H-25-44	LISA Academy	Pending Hearing
H-25-45	Fort Smith SD	Pending Hearing
H-25-46	Hazen SD	Pending Hearing
H-25-47	Greenbrier SD	Pending Hearing
H-25-48	Sheridan SD	Pending Hearing

CLOSED HEARINGS (26)

Case#	School District	Status
2024		
H-24-02	PCSSD	Met Compliance/Closed
H-24-03	Greenwood SD	Met Compliance/Closed
H-24-09	Vilonia SD	Met Compliance/Closed
H-24-11	Conway SD	Met Compliance/Closed
H-24-15	Cabot SD	Met Compliance/Closed
EH-24-17	Malvern SD	Met Compliance/Closed
H-24-21	Springdale SD	Met Compliance/Closed
H-24-23	Malvern SD	Met Compliance/Closed
H-24-27	PCSSD	Met Compliance/Closed
H-24-29	Quitman SD	Met Compliance/Closed
H-24-30	PCSSD	Met Compliance/Closed
H-24-31	Osceola SD	Met Compliance/Closed
EH-24-33	Fort Smith SD	Met Compliance/Closed
H-24-35	Vilonia SD	Met Compliance/Closed
H-24-48	PCSSD	Met Compliance/Closed
2025		
H-25-04	Lakeside SD	Dismissed
H-25-15	Jonesboro SD	Closed/No CA
H-25-19	Conway SD	Dismissed
H-25-21	Lonoke SD	Dismissed
EH-25-28	Pocahontas SD	Dismissed

EH-25-29	Bentonville SD	Dismissed
H-25-31	LRSD	Dismissed
EH-25-30	Fountain Lake SD	Dismissed
H-25-33	Pocahontas SD	Dismissed
EH-25-34	Bentonville SD	Dismissed
EH-25-35	McGehee SD	Dismissed
H-25-37	PCSSD	Dismissed
H-25-38	Clarendon SD	Dismissed

COMPLAINT INVESTIGATION ISSUES (23)

C-25-33
that the IEP did not address the academic needs of the Student, resulting in regression of skills (NS)

that the District failed to provide Positive Behavior Supports for Student (S)

that the District did not address the bullying of the Student that resulted in a denial of FAPE (NS)

that the District failed to meet their child find responsibility when considering the behavioral and feeding needs of the Student (NS).

C-25-34
that the District failed to provide the services in the IEP (S)

that the District failed to allow for meaningful parent involvement by failing to hold an IEP meeting to address parent concerns (NS).

C-25-35
that the District failed to provide services outlined in the IEP (NS)

that the District failed to provide Positive Behavior Supports for the student for disability based behaviors (NS)

that the District failed to provide comparable services in the IEP (NS)

that the District impeded the Parent's opportunity to participate in the decision-making process, specifically by not meeting to address Parent concerns (NS).

C-25-36
that the District failed to develop and implement and Individualized Education Program reasonably calculated to allow for meaningful progress (S)

that the District failed to provide services listed in the IEP (NS)

that the district failed to provide access to educational records prior ti an IEP meeting (NS).

C-25-38
that the District failed to provide social-emotional learning based on peer-reviewed research (NS)

that the District failed to amend the IEP due to lack of expected progress toward goals (NS)

that the District failed to evaluate using a variety of assessment tools to evaluate in all areas of suspected disability (NS).

C-25-39
that the District failed to educate the Student in the Least Restrictive Environment (NS).

C-25-41
that the District failed to develop and implement an Individual Education Program (IEP) IEP for the Student that is reasonably calculated to allow for meaningful educational benefit [8.01.1], specifically, that the District failed to develop and implement an IEP to meet the needs of the Student [8.01.1], and

that the District failed to educate the Student in the Least Restrictive Environment [17.02.1.1.A],

C-25-42
District failed to develop and implement an Individualized Education Program for the Students that is reasonably calculated to allow for meaningful benefit, specifically that the following services were not provide: speech therapy, occupational therapy and special education (S).

C-25-43
that the District failed to develop and implement an Individualized Education Program (IEP) for the Student that is reasonably calculated to allow for meaningful educational benefit, specifically, that the District failed to implement the IEP for the behavioral needs of the Student, resulting in an arrest (S).

C-25-44
that the District failed to conduct a Functional Behavior Assessment (FBA) to define the function of the behaviors. (NS)

that the District failed to develop or implement a Behavior Intervention Plan (BIP) to meet the needs of the Student (NS)

that the District used informal removals from the educational setting to address behavior (NS)

that the District failed to consider the supports and placement needs of the Student (NS)

that the District failed to address the academic needs of the Student (NS)

that the District failed to amend the IEP due to lack of expected progress toward goals (NS)

that the District failed to evaluate adhering to instrument protocols [6.04.2.4] (NS)

that the District failed to consider parental input regarding programming and evaluations (NS)

that the District failed to include rejected proposals of placement and accommodations on the Notice of Action (NOA) (S).

C-25-47
that the District failed to provide the services in the IEP, specifically, by failing to provide a substitute for resource services during teacher absences. (NS)

that the District failed to provide the services in the IEP, specifically, by failing to provide compensatory services for the missed services in the IEP (NS).

C-25-48
that the District failed to develop and implement an Individualized Education Program (IEP) for the Student that is reasonably calculated to allow for meaningful educational benefit [8.01.1], specifically: that the District failed to provide the services in the IEP, by failing to adhere to the dietary requirements listed in the IEP (NS).

C-25-49
that the District failed to provide the 1:1 paraprofessional support listed in the IEP (NS)

that the District failed to determine the need for 1:1 paraprofessional support in a timely manner (S)

that the District failed to allow for meaningful parent involvement by failing to note Parent concerns on the IEP (NS).

C-25-50
allegation that the District failed to develop and implement an Individualized Education Program (IEP) for the Student that is reasonably calculated to allow for meaningful benefit, specifically that the District failed to address the behavioral needs of the Student by removing the 1:1 paraprofessional (NS)

allegation that the District failed to allow for meaningful parent involvement by failing to notify the Parent of the conference (S).

C-25-52
that the District failed to develop and implement an Individualized Education Program (IEP) for the Student that is reasonably calculated to allow for meaningful educational benefit, specifically, that the District failed to provide the supports listed in the IEP (S)

that the District failed to allow for meaningful parental involvement by failing to meet to address lack of progress toward meeting the goals (NS).

C-25-53
that the District failed to develop and implement an Individualized Education Program (IEP) for the Student that is reasonably calculated to allow for meaningful educational benefit, specifically that the District failed to provide the behavioral supports listed in the IEP (S)

that the District used informal removals resulting in a change of placement for the Student (NS)

that the District failed to conduct a Manifestation Determination Review (MDR) within ten days of a decision to change placement (NS)

that the District failed to allow for meaningful parent involvement by failing to address Parent concerns (NS).

C-25-56
that the District failed to develop and implement behavioral supports in the IEP (S)

that the District utilized informal removals to address the Student's behavior (NS).

C-25-58
that the District denied a FAPE by not allowing access to typically developing peers in nonacademic and academic activities [5.06.1],

that the District failed to allow for meaningful parental participation by making decisions outside of the IEP process [9.02.3.1].

C-25-59
that the District failed to develop and implement an Individualized Education Program (IEP) for the Student that is reasonably calculated to allow for meaningful educational benefit, specifically that the District failed to provide the services in the IEP (NS)

that the District failed to educate the Student in the Least Restrictive Environment (LRE) by not allowing access to typically developing peers in nonacademic and academic activities (S)

that the District denied a FAPE by excluding the Student from field trips and school events (S).

C-25-60
that the District released protected personally identifiable information (PII) without consent (NS).

C-25-61
that the District failed to meet the child find obligation of identifying, locating and evaluating students with disabilities (NS)

that the District delayed the referral process to determine eligibility for special education services (NS)

that the District denied a FAPE by excluding the Student from field trips (NS).

C-25-62
that the District failed to develop and implement an Individualized Education Program (IEP) for the Student that is reasonably calculated to allow for meaningful educational benefit [8.01.1], specifically, that the District failed to utilize an appropriately licensed teacher for general education classes (NS.

that the District failed to educate the Student in the Least Restrictive Environment by not allowing access to typically developing peers in nonacademic and academic activities (NS).

C-25-63
that the District failed to develop and implement an Individualized Education Program (IEP) for the Student that is reasonably calculated to allow for meaningful educational benefit, specifically, that the District failed to implement the IEPs as written (NS)

that the District failed to educate the Student in the Least Restrictive Environment by not providing the services in the special education classroom (NS).

OPEN COMPLAINTS
(37)

	Case#	School District	Status
2023			
	C-23-39	KIPP Delta SD	Pending Compliance
2024			
	C-24-17	LISA Academy	Pending Compliance
	C-24-39	PCSSD	Pending Compliance
	C-24-65	Blytheville SD	Pending Compliance

2025

C-25-05	KIPP Delta SD	Pending Compliance
C-25-10	Little Rock SD	Pending Compliance
C-25-22	KIPP Delta SD	Pending Compliance
C-25-23	Mountain View SD	Pending Compliance
C-25-26	Clarksville SD	Pending Compliance
C-25-28	Magnet Cove SD	Pending Compliance
C-25-30	Fort Smith SD	Pending Compliance
C-25-31	Fort Smith SD	Pending Compliance
C-25-33	Jonesboro SD	Pending Compliance
C-25-34	Academy of Math and Science	Pending Compliance
C-25-36	Booneville SD	Pending Compliance
C-25-42	Academy of Math and Science	Pending Compliance
C-25-43	West Memphis SD	Pending Compliance
C-25-49	PCSSD	Pending Compliance
C-25-50	Mountainburg SD	Pending Compliance
C-25-52	North Little Rock SD	Pending Compliance
C-25-53	Yellville-Summit SD	Pending Compliance
C-25-56	Lavaca SD	Pending Compliance
C-25-59	PCSSD	Pending Compliance
C-25-62	Bentonville SD	Pending Investigation
C-25-63	Yellville-Summit SD	Pending Investigation
C-25-64	Pangburn SD	Pending Investigation
C-25-65	Burgman SD	Pending Investigation
C-25-67	Cabot SD	Pending Investigation
C-25-68	Arkansas School for the Deaf	Pending Investigation
C-25-69	PCSSD	Pending Investigation
C-25-70	Hot Springs SD	Pending Investigation
C-25-71	Arkansas School for the Blind	Pending Investigation
C-25-73	Guy Perkins SD	Pending Investigation
C-25-74	Little Rock SD	Pending Investigation
C-25-76	Texarkana SD	Pending Investigation
C-25-77	Rogers SD	Pending Investigation
C-25-80	Little Rock SD	Pending Investigation

CLOSED COMPLAINTS
(34)

Case#	School District	Status
2024		
C-24-25	Scholarmade Achievement Charter	Met Compliance/Closed
C-24-34	West Memphis SD	Met Compliance/Closed
C-24-41	Searcy SD	Met Compliance/Closed
C-24-45	Westwind School for Performing Arts	Met Compliance/Closed
C-24-46	Strong-Huttig SD	Met Compliance/Closed

C-24-48	Clarksville SD	Met Compliance/Closed
C-24-49	Arkansas River Educational Co-Op	Met Compliance/Closed
C-24-50	Cossatot Rive SD	Met Compliance/Closed
C-24-52	Berryville SD	Met Compliance/Closed
C-24-58	PCSSD	Met Compliance/Closed
C-24-60	Bentonville SD	Met Compliance/Closed
C-24-63	Academics Plus Charter School	Met Compliance/Closed
C-24-64	Southwest AR Education Co-Op	Met Compliance/Closed
C-24-66	LRSD	Met Compliance/Closed

2025

C-25-17	Lakeside SD	Met Compliance/Closed
C-25-19	Pocahontas SD	Met Compliance/Closed
C-25-20	Watson Chapel SD	Met Compliance/Closed
C-25-35	LRSD	Closed/No CA
C-25-38	Bentonville SD	Closed/No CA
C-25-39	Harmony Grove SD	Closed/No CA
C-25-47	Yellville-Summit SD	Closed/No CA
C-25-48	Harmony Grove SD	Closed/No CA
C-25-54	McGehee SD	Denied
C-25-57	Springdale SD	Denied
C-25-58	Pea Ridge SD	Withdrawn
C-25-60	Fort Smith SD	Closed/No CA
C-25-61	PCSSD	Closed/No CA
C-25-62	Bentonville SD	Closed/No CA
C-25-63	Yellville Summit SD	Closed/No CA
C-25-66	Midland SD	Denied
C-25-72	Cabot SD	Denied
C-25-75	Cabot SD	Denied
C-25-78	Bentonville Sd	Denied
C-25-79	Bentonville SD	Denied