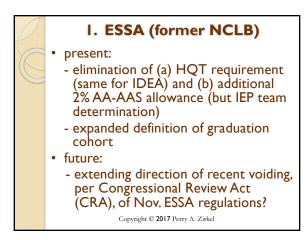
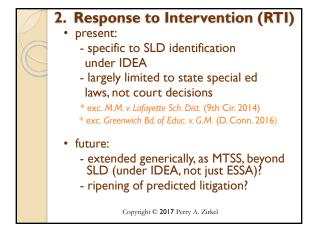
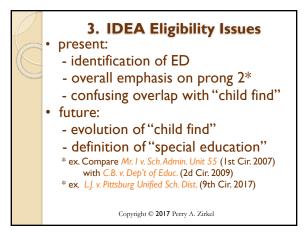
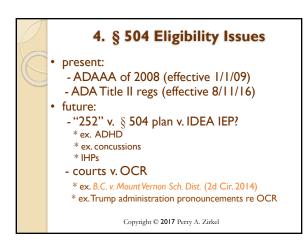
Key Issues in Special Education Law: Present and Future

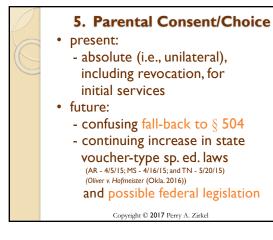
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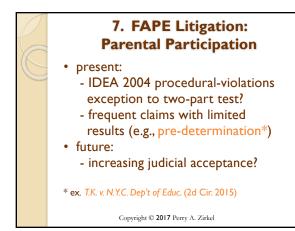






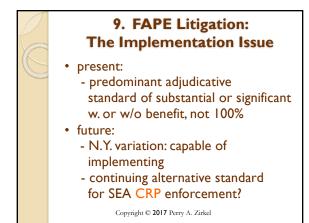


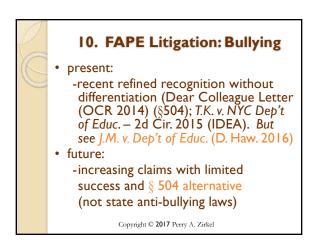




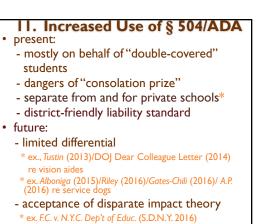
8. FAPE Litigation: Substantive Standard

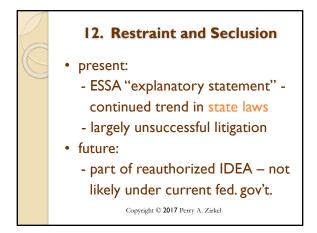
- present:
 - relaxed approach to peer-reviewed research (PRR) provision
 - Endrew F. v. Douglas Cty. Sch. Dist. Re-1 (2017) – progress in the child's individual circumstances
- future:
 - more fact-based analysis under higher but still moderated and flexible standard
 - Second Circuit methodology decision in A.M. v. N.Y.C. Dep't of Educ. Copyright © 2017 Perry A. Zarkel

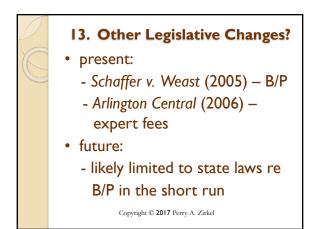




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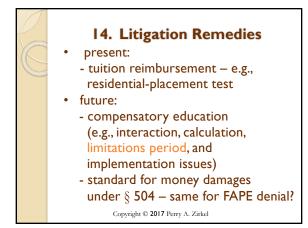


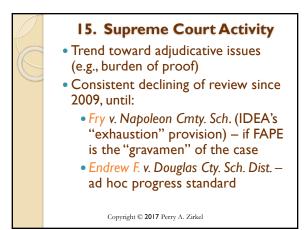




- dyslexia

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16. Effect of Endrew F.

- During first few weeks: 6 of 8 cases being no outcome change, with the other two being remands for reconsideration, especially M.C. v. Antelope Valley Union High Sch. Dist. (2017) ("commensurate opportunity" translation)
- Longer range effect: "it depends" multifactor variation, including child's potential for substantive FAPE and uncertain for 2nd step of procedural FAPE Copyright © 2017 Perry A. Zirkel

