

## **From Our President**



A Letter to Myself (and Maybe to You, Too)

I struggled to find a topic for this month's newsletter. Transparently, I am stressed right now. I find myself easily frustrated, overwhelmed, and constantly feeling like there simply aren't enough hours in the day, the week, or even the weekends to get it all done. Truth be told, I don't like feeling this way, and I don't like my attitude. So, I decided to give myself what my mom would call "an attitude adjustment."

What follows is a letter to myself. Maybe you don't need one, but if you do. I hope it offers some encouragement as we push

through the final stretch of the school year.

Dear Brad,

Spring always feels like a sprint to the finish line—evaluations, IEP meetings, hiring, budgeting, planning for next year when this year isn't even over. You know how this goes. You've been here before. And yet, every year, it feels overwhelming.

Take a deep breath.

Remember when you read *Don't Sweat the Small Stuff... and It's All Small Stuff?* Richard Carlson reminds us that most of what feels urgent in the moment is just that—the moment. You have a choice in how you respond to stress. You can let it consume you, or you can step back, breathe, and remember why you do this work.

You do this for the students.

Every challenge is an opportunity to impact a child's life. Your attitude, your presence, your encouragement—it all matters more than you realize. The students and staff around you are watching how you handle the pressure. So, commit to being a positive light. Smile at a student. Encourage a colleague. Show up with the same passion and purpose that brought you into education in the first place.

The work will get done. It always does. But don't let the small stuff distract you from the big picture.

Finish strong.

Sincerely, Brad

## Notes from the Executive Director



As you know, G-CASE is one of the State Units under National CASE, which is the largest division of the Council of Exceptional

Children (CEC). If you are a member of CASE, you are a member of CEC, and if you are a member of CEC, you are a member of GaCEC! And GaCEC has a lot going on to support your teachers!

One of the best things you can do to support your teachers is to encourage them to join CEC. The networking with other teachers across Georgia and the nation is unparalleled. The specialized resources, tools, and professional learning geared exclusively to special education bring everything your teachers need together in one place so they can improve their practice to affect student outcomes.

One of G-CASE's special initiatives is to "enhance our partnership with GaCEC." During last year's Summer Retreat, the G-CASE Executive Board devoted a session to discussing ways to make this happen, and we will continue to focus on this need at this year's Retreat in June. We are working on ways to actively involve our special education teachers with other special education teachers within the same disability areas. We are also working on ways to bring our teachers together, possibly regionally, as some of our systems already do.

The best support you can give your teachers right now is to encourage them to attend the GaCEC Annual Conference (formerly the *IDEAS Conference*) at the University of West Georgia (June 6-7, 2025). I sit on the Planning Committee and am so impressed with the agenda, sponsors, speakers, table talks, and breakout presentations they have planned. Make this small conference investment this summer and gain stronger, more knowledgeable, happier teachers for the new school year! You all deserve it!



## **ANNUAL CONFERENCE**

\*formerly IDEAS



Hosted by the University of West Georgia





Register Today! https://bit.ly/GaCEC2025



G-CASE

Georgia Council of Administrators of Special Education 2022-2025 Strategic Plan

## VISION

A unified voice promoting excellence in leaders of programs for students with disabilities

MISSION

- > Promote professional learning
- > Promote engaged membership
- > Promote effective leadership

## PURPOSE

G-CASE advocates for improved services for students with disabilities

## STRATEGY

To promote equity, access, inclusion, and belonging to everyone. (Added by Executive Board: June, 2024)

## GOALS AND OBJECTIVES

## Impact legislation and policy

- To impact state legislation and policy by identifying and advocating for key issues/legislative priorities
- To impact national legislation and policy related to IDEA and other special education-focused regulations by identifying and advocating for key issues.

## Promote engaged membership

- To increase, honor, and celebrate membership in G-CASE (state organization) by ensuring member loyalty, retention, and engagement
- To increase membership in CEC/CASE (national organization) by offering efficient registration and an awareness of the benefits of belonging to a professional organization

## Provide performance-based professional learning

- To build the knowledge capacity of members in order to provide improved services for students with disabilities
- To develop and enhance the leadership skills of new members at all levels of administration by strengthening the pipeline from teacher to director
- To expand the leadership skills of all members
- To communicate timely, accurate information that will encourage improved services for students with disabilities
- To value the experience and expertise of Past-Presidents and G-CASE-awarded individuals in the design, implementation, and presentation of professional learning activities

## **Professional Learning**

Drive-In Conferences, Special Education Administrator Development Academy (ADA), Coordinator Skills Institute (CSI), Special Education Leadership Development Academy (SELDA), Georgia Dyslexia Collaborative, Winter GAEL, International CEC Convention, CASE Webinars, Spring Legal Conference...Our G-CASE members and partners have participated in numerous Professional Learning Opportunities since the calendar year 2025 began!

#### **Discipline Drive-In Conference**

In January, nationally recognized attorney Julie Weatherly visited South Georgia to lead a presentation to General and Special Education leaders on *Rules of Discipline for Students with Disabilities and Their Practical Implications* at First District RESA in Metter. The audience of directors, coordinators, lead teachers, behavior specialists, principals, and (a lot of) assistant principals learned about everything from disciplinary removals, manifestations, dangerous and disruptive students with disabilities, weapons, drugs, and serious bodily injury to in-school suspensions and expedited hearings. They also were able to download and keep Julie's 40-page handout, which provided easy-to-access processes and rules for disciplining IDEA students.



#### **Georgia Dyslexia Collaborative Drive-In Conference**

The G-CASE-sponsored Georgia Dyslexia Collaborative presented a **Dyslexia** Think Tank: Considering Criteria for Determining Characteristics of Dyslexia at the Sandra Dunaga Deal Center for Early Learning and Literacy at Georgia College and State University in January. Curriculum and Instruction Administrators, Special Education Directors, MTSS Coordinators, Principals, Principals, School Psychologists, and Speech/Language Assistant Pathologists focused on creating best practices for interpreting and communicating characteristics of dyslexia data from universal screeners in this day-long Drive-In Conference led by G-CASE member and nationally recognized consultant John O'Connor. The timing of this working conference was critical, as January 2025 marked the first time that systems were responsible for identifying students with characteristics of dyslexia. Mr. O'Connor advised the group to recognize that their current processes will become more refined over time and to exercise caution in this identification, as some schools have only been implementing Tier 1 instruction based on the Science of Reading for a relatively short period. He reminded the group that determining that a child has *characteristics* of dyslexia is different than determining a student has dyslexia.



#### **Coordinator Skills Institute (CSI)**

Thirty-seven Special Education Coordinators met in February in Perry to have all their hot topics addressed and questions answered by Julie Weatherly. The topics were specifically chosen by past coordinators and their directors so that the session would be timely and relevant to this special group of special educators.

Our coordinators learned about Making Defensible Manifestation Determinations; Options for Dealing with Dangerous Students with Disabilities; Developing Legally-Defensible IEPS; The Rules for Discipline for Students with Disabilities and Their Practical Implications; Child-Find Requirements, Referrals, Red Flags, and MTSS/RTI; and Prior Written Notice Requirements under IDEA.



#### 2025 Winter GAEL Conference:

Several G-CASE members participated in the 2025 Winter GAEL Conference at The Classic Center in Athens in late January: **Elevating Public Education: Attitude Determines Altitude!** They enjoyed hearing from a variety of educational and motivational speakers, including Kyle Maynard, Chris Clark, Anthony Mohammed, and Mark Wilson. They also attended, led, and facilitated breakout sessions and visited numerous sponsors and exhibitors. G-CASE member and Georgia Dyslexia Collaborative Co-Founder, as well as nationally recognized Educational Consultant John O'Connor, represented G-CASE as our breakout leader, presenting *15 Big Ideas to Increase the Learning and Achievement of Students with Disabilities* to a large audience of special and general education leaders.



G-CASE President Dr. Bard Bowling introduces State School Superintendent Richard Woods at Winter GAEL.



#### **International CEC Convention**

Several G-CASE members were joined by our Tony Molinaro Scholarship winners, Matthew Hall (Wilcox County) and Allison Clarke (Social Circle City), and thousands of other special educators from around the world at the International CEC Convention in Baltimore in March. They learned from acclaimed keynote speakers and from one another by choosing from hundreds of sessions across all special education fields. They visited the "World's Largest Expo Supporting Special Education" to learn about the latest products, programs, and services that benefit special education students and teachers and ended the conference with a Sunset Cruise on the Baltimore Harbor.



#### International CEC Convention, continued





CASE Night Cruise across Baltimore Harbor with the Weatherlys



Former G-CASE President and now current CASE Director of Professional Learning Dr. Zabrina Cannady presented in a Panel Discussion sharing advice for aspiring administrators.

> Read all about it at: CASE Panel Presentation

Page | 11

#### **PROFESSIONAL LEARNING WITH BENEFITS**

#### Two G-CASE Members Receive \$1000 Scholarships to Attend the International CEC Convention in Baltimore

**Matthew Hall**, Special Education Director for the Wilcox County Schools, and **Allison Clarke**, Special Education Director for the Social Circle City Schools, were selected from several applications to receive the *Tony Molinaro Scholarship* to attend the 2025 International CEC Convention in Baltimore last month. As part of their scholarship requirements, they are sharing their experiences with our members:

Good Morning Baltimore! Thanks to the Tony Molinaro Scholarship, I had the incredible opportunity to attend the Council for Exceptional Children (CEC) Convention held in The Charm City. This event was not just an educational gathering; it was a vibrant melting pot of creativity, collaboration, and camaraderie among educators from all corners of the United States.

Stepping into the bustling conference hall, you felt an immediate sense of belonging. The energy was intense, filled with like-minded individuals who share a common passion for advocating for our students with special needs. From seasoned veterans to enthusiastic newcomers, everyone came together with a shared goal: to enhance our knowledge and skills in the ever-evolving field of special education.

One of the highlights of the conference was the chance to network with other educators who are just as dedicated to making a difference. Conversations flowed effortlessly as we exchanged ideas, strategies, and best practices on how to support our students effectively. I met inspiring individuals who have implemented innovative programs and approaches in their schools, and I walked away with a treasure trove of resources that I can't wait to bring back to my local school system.

The sessions I attended were both informative and engaging—covering a wide range of topics from inclusive practices to the latest technological advancements in education. Learning from expert speakers at a national level provided insights that are often unavailable in our local settings. Each workshop offered practical tools that can be applied directly to our classrooms, empowering us to create even more supportive environments for our students.

Beyond the wealth of knowledge, what truly made this experience memorable was the friendships formed along the way. Whether it was through attending a session, exploring the exhibit hall, or even on a crowded boat, I found myself surrounded by passionate educators who understand the challenges we face daily, yet remain positive and hopeful. Together, we learned, laughed, and inspired one another, making lasting connections that extend beyond the conference itself.

Outside of the enriching professional experience, the trip to Baltimore was a delightful adventure. From exploring the city's historical landmarks to enjoying its renowned local food, every moment was a reminder of the importance of balance and joy in our profession. Exploring the vibrant culture of Baltimore added to the excitement and made this trip both educational and enjoyable...just don't forget your walking shoes and make time for a crab cake and Natty Boh with friends!

As I returned home, my heart is full, and my mind is buzzing with new ideas. Baltimore is truly, "A Great Place to Grow". The skills and insights I've gained will undoubtedly impact my practice and benefit my students. I encourage all educators to seek out professional development opportunities like this one—an investment not only in your career but in your students' futures. Let's keep pushing the boundaries of what we can achieve for our students!

-Matthew Hall



CEC Representative to G-CASE Dr. Ashly Hunter and Tony Molinaro Scholarship Winner Matthew Hall take on Baltimore!

#### **Reflections from the CEC Conference**



Thanks to a generous donation provided by the *Tony Molinaro Scholarship*, I recently had the incredible opportunity to attend the CEC 2025 Special Education Convention and Expo. This wonderful experience, held in Baltimore, Maryland, was my first chance to participate in a conference on a national level. Surrounded by passionate educators, policy makers, and advocates from across the country, I left feeling more inspired, informed, and determined than

ever to enhance the services and support we provide to our students.

Upon arriving in Baltimore, what first struck me (aside from the great waterfront and delicious crab cakes) was how easy it was to connect with other educators, both at the conference and around town. No matter where we were coming from, it was easy to see that we all "speak the same language." I quickly discovered that challenges that I thought were unique to Georgia are actually seen nationwide. I was able to meet teachers, administrators, and others from all across the country and had so many helpful and interesting discussions about services, students, challenges, interventions, and so many other topics. There were a plethora of sessions to choose from during the conference with topics that touched every aspect of my job as a special education director. My only problem was narrowing down my choices!

I enjoyed hearing from passionate keynote speakers and CEC officers about their determination to advocate for our students and the services that they require during this time of change and uncertainty at the Department of Education. I also had the opportunity to meet local special educators at the school and collegiate levels at the Georgia/Florida social so that we could share ideas and resources, as well as discuss the need to build our Student CEC groups at the college level for rising special education teachers.

As I return to Georgia, I am eager to implement new ideas, strengthen partnerships, and continue pushing for improvements that truly make a difference in our students' lives. To my fellow educators: let's keep the conversation going, share what works, and advocate for what's needed. We have more in common than you think.

Together, we can drive meaningful change in special education!

-Allison Clarke



### PROFESSIONAL LEARNING GOES NATIONAL

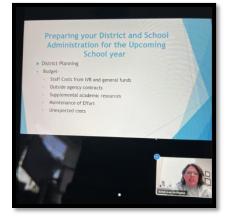
G-CASE Leaders Lead National CASE Webinars

G-CASE Vice-President/CASE Treasurer Dr. Damita James (Middle GA GLRS Director) and G-CASE Treasurer Dr. Kristi-Lee Arrington (Director of Student Services, Houston County Schools) each presented at a National CASE webinar in March.



Dr. James headlined the well-received March 19<sup>th</sup> **CASE Wellness Wednesday Lunch and Learn Series,** a free benefit for CASE members designed especially for special education leaders. As stated on the CASE website: "Dr. James is a huge advocate for the self-care of educators and believes that we must use our experiences as opportunities for growth in our personal and professional lives. Her motto, *Just Breathe*, serves as a reminder that we can get through anything one breath-at-a-time."

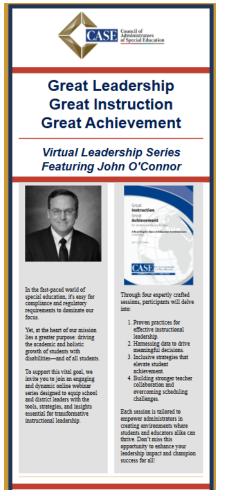
Dr. Kristi-Lee Arrington presented to new Directors of Special Education from across the nation as part of the free-to-members **CASE New Directors' Network** on March 18<sup>th</sup>. Her topic was Planning for Next Year...But This Year Isn't Even Over Yet! Dr. Arrington provided effective tips and advice to new directors (including encouraging them to prepare early for the new school year!)



There are significant benefits to being a member of CASE! Enjoy more FREE Wellness Wednesday and New Directors Webinars!

#### **PROFESSIONAL LEARNING GOES NATIONAL**

G-CASE Leaders Lead National CASE Webinars, continued



G-CASE member and nationally recognized author and consultant John O'Connor shared his expertise on "great instruction, great achievement" at the CASE Special Education Leadership Institute in January and will present virtually as part of the **John O'Connor Leadership Series** on May 19, September 8, and December 2.

Register Here for the CASE John O'Connor Leadership Series.



Become a member of **National CASE** today! There are so many benefits you, as a special education leader, will receive: Professional Learning (many FREE opportunities!), Networking with over 5000 other leaders from across the nation, Resources (publications, information on endorsed products, administrator standards (that the G-CASE *Special Education Administrator Development Academy* uses), Policy and Advocacy at the national level (Action Center, Special Education Legislative Summit in Washington (G-CASE sends our Legislative Committee Co-Chairs every year)...

#### Join CASE Here

Page | 16

#### Special Education Administrator Development Academy (ADA) Closes Out a Year of Learning to Lead

Thirty-five carefully selected participants in the **2024-2025 Special Education Administrator Development Academy** ended their year-long learning journey with "graduation" at the G-CASE Spring Legal Conference in Athens in March. They have learned, and they are ready to lead!

March 4<sup>th</sup> was recognized as *ADA Day* in their honor. Each ADA member presented their cumulative projects to the 400 spring conference attendees during the ADA Showcase and then received a certificate, a specially designed pin, and a GAEL micro-credential badge on stage as each one, along with their director, was recognized.



G-CASE audience members enjoyed meeting each ADA participant and learning about their cumulative projects during the science-fair-type Showcase in which they illustrated their understanding of one of the curriculum standards they learned about through the Academy. Each ADA member created a project that was representative of the components related to their selected standard that could be used to advance the outcome of students with disabilities in their own school systems.

Projects ranged from working with families, self-regulation, co-teaching, LEA Resources, SDI, burnout and stress, parent involvement.....The QR Code to each project continues to be active, so feel free to bring up a project to share or replicate in your system.



#### 2024-2025 Special Education Administrator Development Academy (ADA)

#### **Culminating Projects**

The curriculum of the Special Education Administrator Development Academy (Special Education ADA) is based upon the seven Administrator of Special Education Advanced Leadership Standards set forth by the Council of Administrators of Special Education (CASE) and the Council for Exceptional Children (CEC). As part of the Special Education ADA, participants completed a culminating project in which they illustrated their understanding of a chosen advanced standard by creating a product that is representative of the components related to the selected standard that can be used to advance the outcome of students with disabilities in their own school systems. (Many of the projects can be replicated across all systems!) Click on the QR Code above to visit the projects by the accompanying topic number.

Participant/System	Торіс
Shannon Ammons Glynn County School District	1. Coastal Classroom Collective: New Teacher Program
Liz Barber and	2. Connecting Families with Purpose
Mitzi Norton	
Troup County School System	
Abigail Carrillo	3. Self-Regulation Corner
Morgan County Charter Schools	
Gene Collins	4. Teacher/Staff Contact Resource for The State Schools District
State Schools	
Ashley Compton	5. Support Services Resource Hub
Hart County Charter System	
Katie Cullens	6. Increasing Parent Involvement in Special Education
Glascock County Consolidated	
Caladie Duncan	7. Breath and Motion: Changing Lives in Three Minutes
Pickens County School District	
Melanie Duncan	8. Alternate Access Resource Library
Houston County Schools	
Dr. Deanna M. Gardner	9. What Would You Do?
Newton County School System	
Mary Gebel	10. Thomasville City Schools Elementary /Middle IEP Manager
Thomasville City Schools	
Carly Gilchrist	11. Enhancing Student Outcomes Through Effective Co-Teaching
Richmond County Schools	Strategies

-continued

Leighann Grant	12. Specially Designed Instruction: Helping Educators Meet the Needs
Lowndes County Schools	of ALL Students
Kim Grizzle	13. Co-Teaching
Houston County Schools	15. Co reaching
Holly Hardie	14. Eagles Nest Literacy Launch-a Proposed Literacy Program for
Putnam County Charter Schools	Expectant Mothers through 4 years-old
Rebecca Hendrix and	15. CBI Trips: Planning with a Purpose
Jennifer Phillips	15. Obi Trips. Flaining Weit a Faipose
Douglas County Schools	
Rachel Hortman	16. Behaviors on the Go
Jackson County Schools	
Lashasta Johnson	17. Progress Monitoring Resources
Monroe County Schools	
Kara Klayman	18. Building Bright Futures : Foundational Skills for Lifelong Success
Paulding County School District	
Hope Mealor	19. Informing Parents/Guardians of Post-Secondary Decisions
Habersham County Schools	
Shanona Merrell-Settles	20. Centralized Communication Log
Baldwin County School District	201 00000000000000000000000000000000000
Julee Beth Moore	21. Agenda to Action: Efficiently Running IEP Meetings
Madison County School District	21. Algentaa to Aterion. Entorentaly realming the Ateriotics
Mathew Price	22. Co-Teaching: Sharing the Load of Tier I Instruction
Fannin County School District	22. Co reacting one hour of the reaction
Stephanie Purl	23. Case Management Organizer
Griffin-Spalding County Schools	
Shalanda Quimbley White	24. Child Find Policies and Procedures
Mitchell County Schools	
April Reyes	25. Inclusive Calm Corner
Ben Hill County Schools	
Ashley Starley	26. Progress Monitoring: An Electronic Tool for Monitoring and
Wilkinson County Schools	Analyzing Academic and Behavioral Progress
Aaron Talley	27. LEA Resource Binder
Marietta City Schools	
Sarah Trotter	28. SDI and Accommodations Spreadsheet
Coweta County Schools	
Bonita C. Wade	29. Empowering Special Education Teachers: Addressing Burnout and
Rockdale County Schools	Stress with Leadership Support
Triste Walker	30. Parent Resource Center
Laurens County Schools	
Jessica Waseman	31. ECS New Teacher Academy Professional Learning Framework
Fayette County Public Schools	(2024-2025)
Jessica S. Weaver	32. Special Education Uncovered: Clearing Misconceptions &
Fayette County Public Schools	Strengthening Practices for Educators and Administrators
Casey Whitley	33. IEP Bootcamp
Gilmer County School System	



## ADA Day at G-CASE Spring Conference









#### 2025 G-CASE Spring Legal Conference

This year's Spring Legal Conference accomplished every Professional Learning objective set by G-CASE President Dr. Brad Bowling. Eleven of some of the best Georgia and nationally recognized attorneys presented on the topics our surveyed members said they most wanted to hear (one even co-presented with a special education director!), our GAEL lobbyists provided up-to-the-minute information about what was happening under the Gold Dome, ADA Day celebrated our newest graduates, we welcomed our new State Director with a Social, dined with conference sponsors, recognized our newest award winners, and honored our Past-Presidents as they shared their special G-CASE memories.







New State Director at the GaDOE, Dr. Charity Roberts, met G-CASE members during the G-CASE Social sponsored by Allied Instructional Services.

Page | 21

#### 2025 G-CASE Spring Legal Conference Past-Presidents Share Our Legacy

G-CASE honored our past presidents with a dinner on Sunday, March 2nd, before the Spring Conference and then welcomed them to the conference to reminisce about their G-CASE years as the 50th-year celebration of IDEA kicks off.

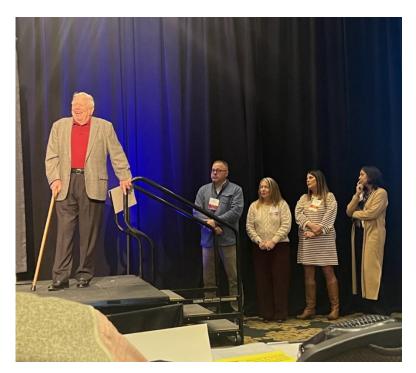




#### 2025 G-CASE Spring Legal Conference Past-Presidents Share Our Legacy, continued



Current G-CASE President Dr. Brad Bowling joins Past-Presidents JoAnn Brittingham, Dr. Luann Purcell, Jennifer Donnelly, Traci White, and Charlette Green



First G-CASE President (1973) Hal Smith with Past-Presidents Greg McElwee, Dr. Zabrina Cannady, Dr. Tris Gilland, and Michele Sayles Harris

#### Lynn Freeman Honored by G-CASE with the Outstanding New Director Award

Somehow, a large contingency of family, friends, and colleagues kept secret that Lynn Freeman, Director of Student Services for the Pulaski County Schools, had won the 2025 *G-CASE Outstanding New Director Award*, even hiding in the very back of the auditorium to surprise and honor her once her name was announced!

Lynn's colleagues stated that she "is a highly-visible presence in the schools, always actively engaged in supporting staff and students, and is a familiar face in the community. Her dedication to fostering relationships and supporting both students and families make her an integral part of this community." She enhances her own educational journey by participating in the Special Education Administrator Development Academy, the Coordinator Skills Institute, SELDA, the Georgia Dyslexia Collaborative, the G-CASE Advisory Board, the Parent Mentor Partnership, and GAEL Summer and Winter Conferences. Lynn has recently agreed to co-chair the G-CASE Legislative Committee and will be representing us in Washington, D.C. in July at the CEC Special Education Legislative Summit.









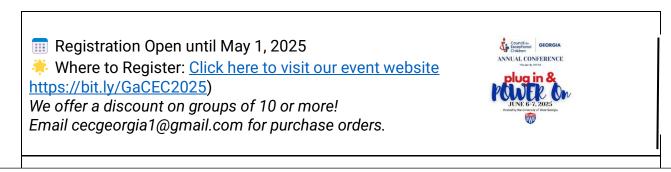




Greetings GCASE Members!

Spring is making its way to Georgia and the GaCEC planning committee has been hard at work planning our GaCEC Annual Conference for June!

As you may have heard, the **GaCEC Annual Conference** (formerly IDEAS) will be hosted at the University of West Georgia College of Education (Carrollton Campus)June 6-7, 2025! This year's theme is **PLUG IN AND POWER ON**. Our keynote speakers include CEC Past President Dr. Angie Jasper, Georgia Teacher of the Year Ms. Holly Witcher, and GaDOE's own Dr. Stephanie Johnson. Tickets are selling fast, so don't delay!



Help us make this conference unforgettable--spread the word to your districts, teachers, and networks! Be SURE to include your CTAE Education Candidates and pre-service students.

In addition, we will be celebrating **Exceptional Children's Week** April 13-19, 2025 and this year's theme is **BUILDING FUTURES.** Please share with us by tagging@CECGeorgia1 or @ga\_unit\_cec in your social media posts.

As always, we love to engage with you on Instagram, X, Facebook, and the Georgia CECommunity. Follow us to connect with fellow members and stay engaged!

Warmest regards,

Verorica Williams President, Georgia Unit Council for Exceptional Children



georgia.exceptionalchildren.org

 $(\mathbf{0})$ 

cecgeorgia1@gmail.com

ື

Page | 25



#### Extracurricular Activities under the IDEA and Section 504 By Beth Morris, Parker Poe

Ensuring that students with disabilities can fully participate in sports, extracurriculars, and field trips is not just an opportunity to foster inclusion and promote equal opportunities for all students but may be a legal obligation for school districts. While these extracurriculars are not explicitly required under either the Individuals with Disabilities Education Act (IDEA) or Section 504 of the Rehabilitation Act; however, there are several important distinctions between the two. Both require that districts provide students with disabilities equal opportunities to participate in these activities and the students' IEPs must include any supplementary aids and services the student requires to participate in those activities, if the student requires it for FAPE. Of course, neither IDEA nor Section 504 *require* school districts to offer extracurricular activities in general, but it does require them to take the necessary steps to afford students with disabilities an equal opportunity for participation in these activities, if offered. Essentially, if the school chooses to offer these activities to students, then it must do so without discrimination. This article explores those legal frameworks, key considerations for compliance, and best practices for facilitating participation in these experiences.

I. IDEA

The IDEA requires schools to provide a "free appropriate public education" in the "least restrictive environment." 34 C.F.R. § 300.101; 34 C.F.R. § 300.114. In addition to academic services, this requires public schools take steps to provide non-academic and extracurricular services and activities in the manner necessary to afford children with disabilities an equal opportunity for participation in those services and activities, which may include athletics, transportation, recreational activities, and special interest groups or clubs sponsored by the school. 34 C.F.R. § 300.107. The school must ensure that each child with a disability participates with nondisabled children in those activities to the maximum extent appropriate to the needs of that child. 34 C.F.R. § 300.117. Finally, the school must ensure these children have the supplementary aids and services determined by their IEP to be appropriate and necessary for the child to participate in non-academic

settings. In other words, if the IEP Team determines that a student believes a student requires the participation in non-academic settings for the provision of FAPE, the Team must also consider what, if any, supplementary aids and services, and/or special education supports the student may need in order to participate in that non-academic setting.

While the IDEA does not specifically mention field trips, the U.S. Department of Education has advised that the list of extracurricular activities and services in the IDEA is not exhaustive, but rather only provides a few example of services that may afford children with disabilities an equal opportunity for participation in activities offered to other children. 71 Fed. Reg. 46,583 (2006). What services a student requires will depend on each individual IEP, but generally a school should ensure equal opportunity for students with disabilities to attend field trips.

Some case law has elaborated on what these requirements look like for school districts. In 2010, parents of a student with autism and Tourette's Syndrome requested that her IEP team consider supplementary aids and services to allow her student to participate in volleyball and other afterschool clubs.<sup>1</sup> After the Court of Appeals held that the IDEA regulations limit extracurricular activities to be included in an IEP to those required for educational purposes, the Supreme Court reversed that holding. Instead, if the IEP team concludes an extracurricular activity is appropriate, the IEP must include a statement of program modifications or services so as to allow the student to participate to the maximum extent appropriate, regardless of the activity's relationship to an educational objective.

While a school must provide equal opportunity for participation in extracurricular activities and must inform the students of these opportunities, there is a limit to what a school must do. For example, the parent of a student with a learning disability requested her child's IEP to require the school to individually email her of all extracurricular opportunities.<sup>2</sup> The state's educational agency ruled that the school complied with the IDEA by notifying the school community at large, which included that particular student and his parents, of available activities through texts, its website, in class announcements, and parent-teacher conferences.

#### I. Section 504

Section 504 of the Rehabilitation Act requires that schools receiving federal financial assistance to provide non-academic and extracurricular services and activities

<sup>&</sup>lt;sup>1</sup> Independent Sch. Dist. No. 12, Centennial v. Minnesota Dep't of Educ., 55 IDELR 140 (Minn. 2010), cert. denied, 111 LRP 12933, 131 S. Ct. 1556 (2011).

<sup>&</sup>lt;sup>2</sup> Santa Fe R-X Sch. Dist., 62 IDELR 99 (SEA MO 2013).

in such manner as is necessary to afford students with disabilities an equal opportunity for participation in such services and activities. 34 CFR 104.37. This may include counseling services, physical recreational athletics, transportation, health services, recreational activities, and special interest groups or clubs sponsored by the recipient. Id. The Office of Civil Rights (OCR), which enforces Section 504, has stated that when deciding whether a reasonable accommodation is required, the school district must first engage in an individualized inquiry to determine whether the accommodation is necessary. If it is, the district must allow it unless doing so would result in a fundamental alteration of the nature of the extracurricular or athletic activity.<sup>3</sup>

Some examples of when the OCR has found a district violated Section 504 include when a school district failed to include a student with down syndrome and behavioral issues in extracurricular activities, such as music and recess, with his nondisabled peers<sup>4</sup> by excluding the student based on disability related reasons and when a school failed to convene a 504 team meeting for a student who wanted to try out for football, after receiving conflicting information from his doctor regarding the student's physical limitations related to asthma (resolved voluntarily).<sup>5</sup> While a school district is not required to enable a student to play on a team, they are required to provide access to the activity and tryouts and to determine whether there are reasonable accommodations needed to enable a student to access that activity. However, not every situation demands a meeting. The OCR stated in an advisory letter that "[i]n some circumstances, the inquiry could amount to something as straightforward as a coach or athletic staff member consulting with the student and student's parents to determine what reasonable modifications could be provided to give the student an equal opportunity to participate in the activity."6

Regarding field trips, the OCR investigated a school district in 2023 when it prohibited a student with an undisclosed disability from a field trip that all other students were scheduled to attend.<sup>7</sup> OCR warned the district may have discriminated against the student but entered into a voluntary resolution agreement with the district, advising the school's staff to review students' IEPs to ensure any reason to prohibit them from attending a field trip wasn't related to or caused by their disability.

#### I. Conclusion

Ultimately, while IDEA and Section 504 use different language, a school district can comply with both of them by providing students with an equal opportunity to participate

<sup>&</sup>lt;sup>3</sup> Fairless (OH) Local Schools, 122 LRP 48530 (2022).

<sup>&</sup>lt;sup>4</sup> Fairborn (OH) City Schs., 54 IDELR 174 (OCR 2009).

<sup>&</sup>lt;sup>5</sup> Duval County (FL) Schs., 66 IDELR 230 (OCR 2015).

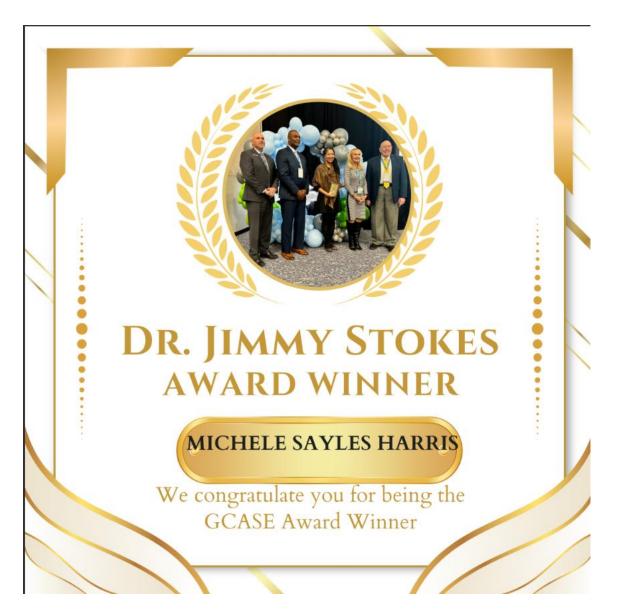
<sup>&</sup>lt;sup>6</sup> Elmore County (AL) Sch. Dist., 70 IDELR 162 (OCR 2017).

<sup>&</sup>lt;sup>7</sup> Butte (MTEletion Results) Sch. Dist. No. 1, 123 LRP 17117 (OCR 2023).

in extracurricular activities, whether it be sports, after-school clubs, or field trips. What this entails depends on the context and a student's individual needs to ensure compliance with the law.



Michele Sayles Harris Receives the 2025 Dr. Jimmy Stokes Distinguished Service Award



Congratulations to G-CASE Immediate Past-President **Michele Sayles Harris**, Chief of Student Services, Marietta City Schools, who was awarded **the G-CASE 2025 Dr. Jimmy Stokes Distinguished Service Award** at Winter GAEL. Michele's commitment and service to G-CASE, CASE, CEC, and GAEL makes her an outstanding leader and role model for Georgia's special educators.

Page | 30

#### **2025 G-CASE Election Results**

G-CASE officer election results for the new year were announced during the Business Meeting on March 4<sup>th</sup> at the G-CASE Spring Legal Conference.



**Sean Cooper** will assume the role of G-CASE Vice-President, to succeed to the position of President in 2027. Sean is starting his tenth year as the Director for WestGA GLRS, where he serves seventeen school districts and two GNETS locations. Before joining WestGA GLRS, he worked for Thomas County BOE, Colquitt County BOE, and Houston County BOE in multiple areas, including as a GNETS Teacher, Instructional Technologist, CTAE Instructor, Special Education Teacher, Behavior Specialist, PBIS Coordinator,

and Special Edu-cation Administrator. He has been an active CEC, G-CASE, and GAEL member for 15 years. He serves on the G-CASE Executive Board as the Legislative Co-Chair, represents G-CASE on the GAEL Priorities Committee, and serves as the Georgia Lead for the CASE Special Education Legislative Summit held in Washington, DC. He also serves on the Georgia Department of Education State Advisory Panel.



Larissa Beecher is the new G-CASE Secretary. With over 19 years of experience, she has served and supported students diagnosed with severe emotional disorders, intellectual disabilities, and autism. Her previous roles included a special education teacher, department chair, and district-level instructional coach. Currently, Larissa serves as the Middle Georgia GLRS Coordinator and RESA School Improvement Specialist. She leads the Middle Georgia GLRS Transition, Autism, Behavior, and Access Consortium,

collaborating with districts, RESAs, and the Georgia Department of Education to deliver professional development, training, and webinars. Larissa is a founding member of the Middle Georgia Council for Exceptional Children (CEC), where she serves as Chapter President. She also holds the position of Membership and Communications Chair for the Georgia Division on Career Development and Transition (DCDT). She is an active member of G-CASE and is currently the Lead Ambassador for the Fall and Spring conferences. In recognition of her outstanding contributions, Larissa was named the recipient of the 2024 *Dr. Jimmy Stokes Distinguished Service Award* by G-CASE.

Page | 31

#### 2025 G-CASE Election Results, continued



**Dr. Cindy Felkins** is a dedicated leader and advocate in the field of special education with 27 years of experience working with students with disabilities across diverse educational settings. She was chosen as the **G-CASE Representative to CEC**. Currently, she serves as the Director of Student Support Services and Federal Programs for the Bleckley County School System. Her commitment to professional excellence is evident through her active involvement in various civic organizations and

professional associations, including CASE, G-CASE, and CEC. She serves on the G-CASE Executive Board as the chair of the Strategic Planning Committee and has represented East Central GLRS on the G-CASE Advisory Board. Dr. Felkins is widely recognized for her contributions to special education. She is a past recipient of the G-CASE Outstanding New Special Education Director Award and the Dr. Jim-My Stokes Distinguished Service Award through GAEL. A passionate mentor, she takes pride in guiding new special education teachers and directors and fostering the next generation of leaders in her field.



#### 2024-2025 G-CASE Executive Board

#### **PBS NewsHour Interviews G-CASE**

PBS NewsHour producer Layla Quran interviewed G-CASE leadership in preparation for a series of national documentaries to be presented this year. She discussed the special education teacher shortage in Georgia with members of the G-CASE Executive Board, highlighting the various efforts underway to address it, including collaboration between different systems to alleviate the issue, attract new teachers, and more. She also asked IDEA funding and resources to systems in Georgia. G-CASE leaders participated digitally by sharing their needs and best practices.



# PBS NEWSHOUR

#### 2025 PAGE Day on Capitol Hill

G-CASE Legislative Co-Chair Sean Cooper joined hundreds of attendees for the 2025 PAGE Day on Capitol Hill on February 18<sup>th</sup>. PAGE partnered with GAEL and GACTE (Georgia Association of Colleges for Teacher Education) to share information about bills affecting education and the budget for the new fiscal year. Eight legislators spoke about current education bills and State School Superintendent Richard Woods outlined the Georgia Department of Education's Legislative Priorities.

GAEL was able to present its own list of *Legislative Priorities* to legislators, as well. G-CASE is proud that Sean Cooper, who represents G-CASE on the GAEL Educational Priorities Committee, helped lead the way to the addition of an \$871,982 increase in QBE funds to fully fund the school psychologists ratio at 1:2,40!

Advocacy works!



Members of the G-CASE Legislative Team attended PAGE Day at the Capitol.

#### 2025 Summer GAEL



The 2025 GAEL Summer Conference will be held at the Jekyll Island Convention Center July 13-16. This conference is always a highlight for all educational leaders as the summer winds down and administrators gear up with timely information and skill-building opportunities for the new school year. Conference keynote speakers include Sandy Zimmerman (Educator, Author, and Champion Athlete), Dr. Tracie Swilley (2025 National Principal of the Year, Transformational Leader educator, and Mentor), Joe Jones (Superintendent, Educational Leader, and Author), and TJ Vari (Education Strategist, Leadership Coach, and Author). G-CASE leaders will present a Breakout Session for General and Special Educators on the importance of including and involving special education administrators in school, district, and instructional planning meetings during decision-making processes.

Less than 200 spots are available! Register here for the Summer GAEL Conference.

#### 2025 Theodore Smith \$1000 Scholarship

Theodore Smith devoted his life to education as a teacher and administrator with more than fifty years of service. This award enables special education teachers or special education paraprofessionals to further their pursuit of excellence with two scholarships of \$ 1,000 each. In addition to the \$1000 for higher education, paraprofessionals who are not CEC members will receive a one-year free CEC membership.

#### **Qualifications:**

- Teachers must be current members of CEC. Paraprofessionals are exempt from this requirement
- Must be pursuing a higher degree in special education, a bachelor's degree in special education (paraprofessionals), or added certification to meet the standards for highly qualified in special education
- Must be currently employed in a special education teaching position or as a special education paraprofessional with one or more years of experience and have a desire to remain in the profession of education of students with special needs

#### To Apply:

- Complete the Google Application Form at this link: <u>2025 Theodore Smith</u> <u>Scholarship</u>
- Include one letter of recommendation from a teacher or administrator that can address the applicant's team spirit and teaching skills. Have the reference email the letter to <u>sburbach@gael.org</u>
- The letter of recommendation must include an endorsement by a current G-CASE member
- Documentation of acceptance into a current degree program within the state of Georgia Email to <u>sburbach@gael.org</u>
- Copy of most recent transcript and grade report Email to <u>sburbach@gael.org</u>
- Completed application must be postmarked by May 16, 2025.
- Awards will be made in early June



#### **G-CASE Gets a New Website**

*Friend of G-CASE* Award winner Missy Sullivan has created a beautiful new website for G-CASE! This new website makes it easier than ever to access information about important dates, conferences, award winners, G-CASE business, conference presentations and handouts, and lot of pictures!

Bookmark the website today for all your G-CASE news at g-case.org.





## 2024-2025 G-CASE Special Initiatives:

Special Education Administrator Development Academy (ADA)

Coordinator Skills Institute (CSI)

SELDA Mentoring Program

Georgia Dyslexia Collaborative

Diversifying Special Education Leadership

Enhancing Partnership with GaCEC

**G-CASE** Promotes Professional Learning

#### Thank You for Supporting Our

#### 2025 G-CASE Spring Legal Conference Sponsors

#### **Allied Instructional Services**

Allied Instructional Services is an education management company whose mission is to partner with schools and government agencies by providing the professional staff and support needed to build brighter futures for individuals with disabilities. <u>https://www.alliedinstructional.com/</u>

#### **Amergis Educational Staffing**

Our integrated workforce technology solutions enhance your staffing capabilities by streamlining processes, improving efficiency, and providing valuable data insights. <u>https://www.amergis.com/</u> <u>G-CASE Spring Legal Conference Link</u>

#### eLuma

eLuma partners with K-12 school districts to provide online special education services on a secure platform, including speech therapy, occupational therapy, counseling, and psychoeducational evaluations.

https://eluma.com/ G-CASE Spring Conference Presentation Link

#### Goalbook

#### \*CASE-Endorsed Product: Toolkit

Goalbook Toolkit improves special education student outcomes by building teacher capacity to develop higher-quality IEPs and implement them with more effective specially designed instruction. It is an online solution for teachers that guides them to confidently identify student present levels, save time in developing meaningful standards-aligned goals, and successfully implement IEPs with instant access to research-based instructional strategies, classroom-ready resources, and tools to progress monitor. http://www.goalbookapp.com Link to G-CASE Spring Conference Presentation

#### Robokind

#### \*CASE-Endorsed Product: Robots4Autism

We are an education technology company that combines assistive technology with meaningful curriculum that accelerates measurable outcomes for marginalized students. <u>www.Robokind.com</u>

#### **Stages Learning**

Provides a complete curriculum for learners with autism, cognitive and developmental delays and school readiness needs. <u>www.stageslearning.com</u>

#### **University Instructors**

University Instructors provides impactful research-based instructional services to our K-12 school partners – to enhance the achievement of ALL students and build local talent pipelines.

https://universityinstructors.com/

#### Wilson Language Training

Structured literacy with an evidence-based, multi-tiered reading system empowers students to become fluent, independent readers.

www.wilsonlanguage.com G-CASE Spring Conference Link



## **SAVE THE DATES:**

G-CASE Fall Conference: November 12-14, 2025 (Savannah)

G-CASE Spring Legal Conference: March 2-4, 2026 (Athens)