

Designing Teacher Training and Inclusive Curriculum Support Systems for Educators Serving Students with Autism, Hearing Impairments, and Intellectual Disabilities

**A White Paper by Dr. Raymond V. Alfonso
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Introduction

U.S. public schools are educating a large and growing population of students with disabilities, but the legal mandate to provide access has outpaced the day-to-day instructional capacity of many schools. In the 2022–23 school year, 7.5 million students ages 3–21 received special education and related services under the Individuals with Disabilities Education Act, representing 15 percent of all public-school students. At the same time, CDC surveillance continues to show high and rising identified prevalence of autism, with about 1 in 31 eight-year-old children identified with autism spectrum disorder in 2022. These figures matter because they are not abstract compliance numbers; they describe the actual teaching load now carried by general educators, special educators, paraprofessionals, and related service teams across the country.

Federal law has never contemplated that inclusion would be accomplished by seat assignment alone. Congress stated in IDEA that educational results improve when students with disabilities have access to the general education curriculum in the regular classroom to the maximum extent possible, when appropriate supports and services are provided in that classroom, when school systems invest in high-quality professional development, when positive behavioral interventions and supports are used, and when technology and assistive technology are developed and deployed to maximize accessibility.¹ Congress also stated that special education should become “a service ... rather than a place where such children are sent,” a phrase that remains foundational for any serious inclusive-education model.²

This white paper argues that the current challenge in inclusive special education is not merely a matter of legal interpretation but of system design. Districts often possess isolated expertise: a strong autism teacher in one school, a signing aide in another, a behavior specialist at the district office, but lack a coherent mechanism for turning that expertise into a repeatable training and curriculum-support system for all educators. That gap is particularly consequential for students with autism, hearing impairments, intellectual disabilities, and complex communication needs,

because these learners often require coordinated supports across instruction, communication, behavior, social participation, and environmental design. IDEA's structure, the ADA's communication-access requirements, Section 504's equal-access standard, CAST's UDL framework, and the field's High-Leverage Practices all point to the same conclusion: inclusion becomes meaningful only when educator capacity is built as an operational system, not treated as an individual talent.³

The proposed response in this paper is the **Alfonso Teacher-Capacity Framework™**: a layered professional development and curriculum support model that equips general educators, special educators, teacher assistants, and paraprofessionals to deliver more consistent instruction and access to communication across settings. The model is designed for practical use in U.S. public schools, especially districts that must improve inclusion without waiting for ideal staffing conditions or high-cost program redesign. Its central premise is simple: specialized expertise should not remain trapped inside a single classroom, a single teacher, or a single disability category. It should be translated into training routines, lesson-adaptation tools, coaching cycles, and schoolwide practices that can be scaled.

Why Inclusion Requires More Than Placement?

IDEA's least restrictive environment rule is often discussed as though it were mainly a placement doctrine. In fact, the law is more demanding than that. Section 1412(a)(5)(A) requires that children with disabilities be educated with nondisabled peers to the maximum extent appropriate, and that removal from the regular environment occur only when education in regular classes with the use of supplementary aids and services cannot be achieved satisfactorily.⁴ That text makes the order of operations unmistakable: schools must first consider what supports, services, and instructional adjustments can make participation workable before treating separation as the answer.

That same structure appears in the IEP provisions. IDEA requires each IEP to include the child's present levels of performance, an explanation of how the disability affects involvement and progress in the general education curriculum, the special education and related services to be provided, the supplementary aids and services to be provided, and the program modifications or support for school personnel necessary to help the child advance appropriately and participate in the curriculum and school setting.⁵ A legally sufficient IEP, therefore, is not just a destination document; it is a delivery document. It requires schools to specify how instruction, support, and adult practice will change.

The Supreme Court's decision in *Endrew F. v. Douglas County School District RE-1* underscores why physical inclusion without genuine instructional design is inadequate. The Court held that an IEP must be "reasonably calculated to enable a child to make progress appropriate in light of the child's circumstances," and rejected the lower court's "merely more

than de minimis” standard. The Court further emphasized that every child’s program must aim at academic and functional advancement, and that for students who are not able to achieve on grade level, the program must still be “appropriately ambitious” and give the child the chance to meet challenging objectives.⁶ In other words, the law does not permit symbolic access. It requires planned, ambitious, individualized supports that are actually capable of moving learning forward.

Section 504 of the Rehabilitation Act reinforces that point from the civil rights perspective. Its education regulation defines an appropriate education as the provision of regular or special education and related aids and services designed to meet the student’s individual educational needs as adequately as the needs of nondisabled students are met.⁷ That standard does not mean identical programming; it means comparable access to the benefits of schooling. A student who is physically present in a class but cannot access communication, follow instruction, regulate behavior, demonstrate understanding, or participate socially has not been given meaningful access simply because the roster says “included.”

Communication-access law reaches the same conclusion. Under the ADA, covered public entities must provide auxiliary aids and services when needed for effective communication, and the appropriate aid depends on the nature, length, complexity, and context of the communication as well as the person’s normal method of communication. For deaf and hard-of-hearing individuals, those aids and services may include qualified interpreters, real-time captioning, written materials, assistive listening systems, and other communication technologies. The guidance also makes clear that video remote interpreting is not effective in every situation and that staff training is part of making communication access work⁸. This matters in K–12 schooling because much of classroom learning is fast, multi-speaker, visual, and socially dynamic. Communication access must therefore be designed, not improvised.

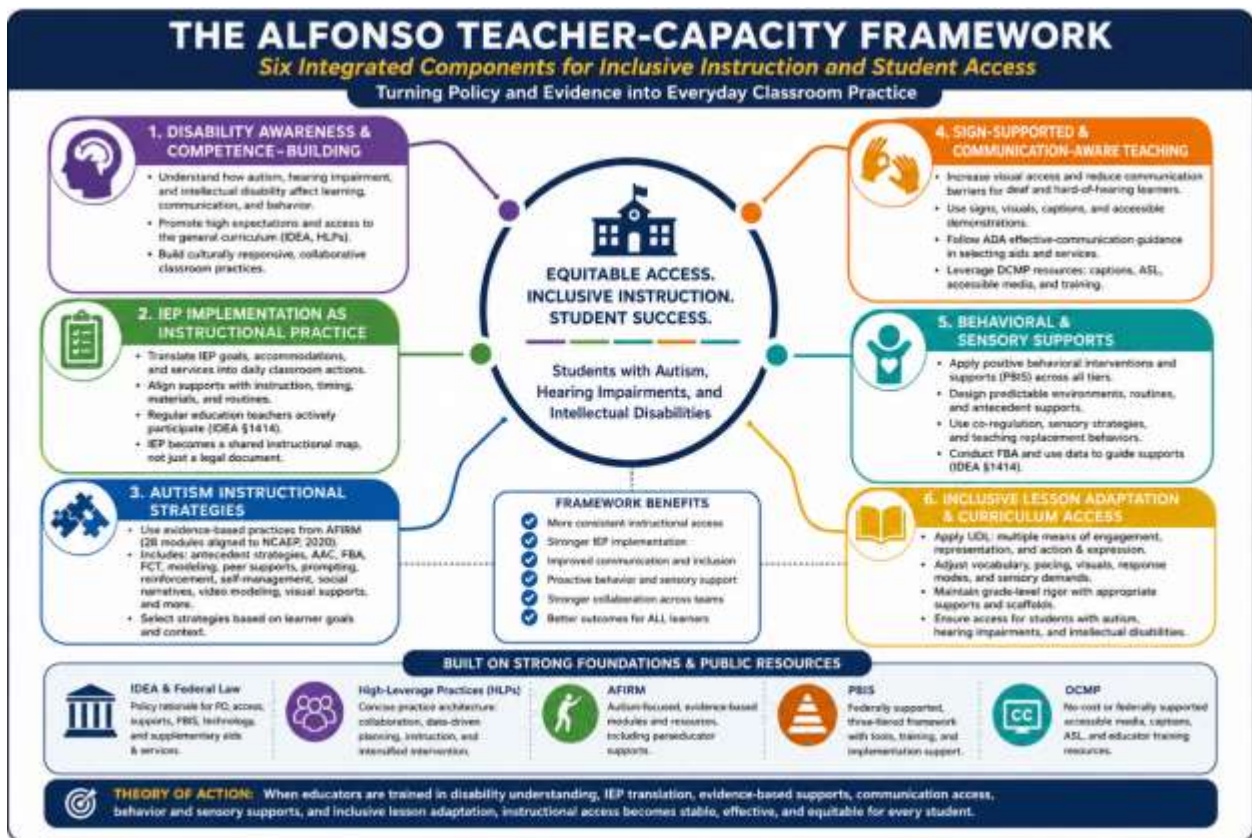
Universal Design for Learning supplies curricular architecture for that design work. CAST’s UDL Guidelines organize access around multiple means of engagement, representation, and action and expression. These three dimensions translate the inclusion mandate into ordinary instructional decisions: how material is presented, how students sustain attention and participation, and how students show what they know. UDL does not replace individualized supports, but it reduces avoidable barriers and creates a curriculum that is more flexible from the outset. For students with autism, hearing impairments, and intellectual disabilities, that flexibility is especially important because it reduces the extent to which every access need must be solved through last-minute accommodation.

The field’s High-Leverage Practices echo the same principle. The Council for Exceptional Children and CEEDAR organize HLPs around collaboration, data-driven planning, instruction in behavior and academics, and intensifying intervention as needed. Importantly, HLPs are framed as practices for all educators, not just special educators, because students with disabilities are present across general education classrooms and school settings. That broad frame is crucial.

Meaningful inclusion requires a distributed workforce competence model, not a siloed specialist model.

The Alfonso Teacher-Capacity Framework™

The **Alfonso Teacher-Capacity Framework** proposed in this paper is a school-facing and district-usable model for converting special-education expertise into an organized training system. It is not a separate curriculum or a new compliance layer. It is a professional development and instructional support architecture that translates legal duties and evidence-based practices into routines that educators can actually use. Its purpose is to ensure that students with autism, hearing impairments, and intellectual disabilities receive more consistent instructional access across classrooms, service settings, and adult teams. The framework is built around six components, each grounded in existing U.S. policy and practice literature.



1. **Disability awareness and competence-building.** Educators need disability knowledge that moves beyond labels and into classroom implications. IDEA itself centers “unique needs,” high expectations, and access to the general curriculum; The Council for Exceptional Children, in partnership with CEEDAR, developed the High-Leverage Practices for students with disabilities (HLPs). Similarly, HLPs reject narrow, deficit-only conceptions of disability and stress culturally inclusive pedagogies and collaboration. In practice, disability awareness training under the Alfonso model would teach staff how autism may affect social communication, sensory regulation, and predictability needs; how hearing impairment changes access to spoken instruction, peer talk, and demonstrations; and how intellectual disability may require stronger explicit instruction, repetition, scaffolding, and adapted pacing. The point is not to make every teacher a diagnostician. The point is to make every teacher more instructionally fluent.
2. **IEP implementation as instructional practice.** Too often, IEP training is treated as compliance paperwork rather than classroom craft. IDEA requires the regular education teacher to participate in determining supplementary aids and services, program modifications, and supports for school personnel, and it requires the IEP to describe how the disability affects progress in the general curriculum.⁹ Under the Alfonso model, staff training would therefore begin with a practical translation routine: each annual goal, accommodation, related service, and support gets converted into visible classroom actions, timing cues, lesson adjustments, behavior supports, and communication procedures. This turns the IEP from a legal file into a shared instructional map.
3. **Autism instructional strategies.** For autism, the framework emphasizes the disciplined use of evidence-based practices rather than generic goodwill. The AFIRM project at the Frank Porter Graham Child Development Institute explains that its modules guide educators through the step-by-step process of planning for, using, and monitoring evidence-based practices with learners on the spectrum from birth to age 22, and that AFIRM developed 28 modules based on the 2020 National Clearinghouse on Autism Evidence and Practice report. These include antecedent-based interventions, augmentative and alternative communication, functional behavioral assessment, functional communication training, modeling, peer-based interventions, prompting, reinforcement, self-management, social narratives, social skills training, technology-aided instruction, video modeling, and visual supports. That range is especially useful for school systems because it shows that autism support is not reducible to one method; it requires structured selection based on a learner’s goals and context.
4. **Sign-supported and communication-aware teaching.** The framework deliberately includes sign-supported communication and communication-awareness training even in schools that do not operate full sign-bilingual programs. ADA guidance requires schools and other public entities to consider the student’s usual communication method and the complexity of the interaction when selecting aids and services. DCMP further underscores that captions, ASL interpretation, and accessible educational media are not peripheral add-ons; they are central access tools, and its federally funded platform



provides training videos, school-personnel training, and widely used captioning guidelines for educational media. Within the Alfonso model, sign awareness does not replace interpreters or Teachers of the Deaf; rather, it helps classroom staff design more visually accessible instruction, reduce communication lag, and improve peer interaction.

5. **Behavioral and sensory supports.** IDEA expressly directs the IEP team to consider positive behavioral interventions and supports when behavior impedes learning, and Congress identified positive behavioral interventions and supports as part of what makes education more effective for children with disabilities. The Center on PBIS, funded by the U.S. Department of Education, describes PBIS as an evidence-based three-tiered framework and highlights that, when implemented with fidelity, students with disabilities experience improved social, emotional, and behavioral outcomes and reduced exclusionary discipline. The Alfonso model uses this logic to shift classrooms away from reactive discipline and toward proactive environment design, predictable routines, antecedent supports, co-regulation, and formal use of functional behavior assessment when needed.
6. **Inclusive lesson adaptation and curriculum access.** CAST's UDL Guidelines and IDEA's access-to-curriculum provisions support a final component focused on lesson adaptation. Under this component, teachers are trained to adjust representation, response modes, pacing, visual organization, vocabulary load, sensory demands, and demonstration formats so that students can participate without, by default, lowering essential learning goals. For students with intellectual disabilities, this often means explicit sequencing, reduced clutter, repeated modeling, and tight alignment between lesson objectives and task demands. For students with autism, it may mean visual schedules, structured transitions, clear expectations, and alternative modes of participation. For deaf and hard-of-hearing learners, it means front-loading vocabulary, maximizing sightlines, aligning demonstrations with interpreters or captions, and ensuring peer-discussion formats are accessible.

Taken together, these six components form a practical theory of action: if schools systematically train adults in disability understanding, IEP translation, evidence-based autism supports, communication access, positive behavioral and sensory supports, and inclusive lesson adaptation, then instructional access becomes more stable across classrooms and less dependent on single-educator heroics. That is the shift this paper recommends from isolated excellence to institutionalized educator capacity.

Training General Educators and Paraprofessionals

A workable inclusive system cannot be built on the assumption that special educators alone will carry expertise. IDEA expressly places the regular education teacher on the IEP team when the child is, or may be, participating in the regular education environment, and requires that teacher to participate in determining positive behavioral supports, supplementary aids and services,

program modifications, and support for school personnel. That statutory structure is already a theory of professional learning: inclusion succeeds only when the general educator understands the student's access pathway and helps build it.

For that reason, the Alfonso model treats general-education training as core rather than peripheral. Training should focus on three things. First, teachers need a reliable "read the IEP for instruction" protocol that highlights what must change in lesson design and delivery. Second, they need a small repertoire of classroom-ready supports: visual anchors, explicit modeling, pre-correction, simplified language plus preserved rigor, structured peer supports, and alternate response modes. Third, they need coaching, not one-time lectures. HLPs place collaboration at the center of effective practice, and the PBIS center repeatedly pairs improvement with training, coaching, data use, and district support rather than isolated workshop sessions.

Paraprofessionals and teacher assistants require equally deliberate support. In many schools, they spend the most minutes with students who have the greatest communication and regulation needs, but they often receive the least structured professional learning. AFIRM addresses this gap directly through its "AFIRM for Paraeducators" modules, which provide paraeducators working with elementary learners on the spectrum with modules in prompting, reinforcement, supporting peer interactions, time delay, and visual cues. That set is instructive even beyond autism, because it names exactly the sort of practice that paraprofessionals must be able to use consistently if instruction is to remain coherent across classrooms and transitions.

Accordingly, the Alfonso framework recommends a **mentor-and-release model** in which a special educator or inclusion lead first models support, then coaches the paraprofessional during live instruction, then observes fidelity, and finally reviews implementation with the classroom teacher. This matters for two reasons. First, it prevents the common problem of paraprofessionals inventing support systems that drift from the IEP and from the classroom teacher's actual lesson. Second, it protects against the equally common problem of paraprofessionals being used mainly as proximity monitors rather than as appropriately coached instructional supports. IDEA's reference to support for school personnel and AFIRM's paraeducator modules together support the view that adult consistency is itself an access intervention.

In practice, a district can operate this with a short-cycle coaching structure: one weekly collaborative planning meeting, one in-class demonstration or observation, one debrief using a simple fidelity checklist, and one shared adjustment for the next week. This is administratively lighter than a full program redesign, but it produces much stronger continuity. It also helps address a persistent equity problem in underserved schools, where students may technically have supports on paper but experience them inconsistently because staff turnover, substitute coverage, or uneven training breaks the chain of implementation.

Communication Access and Inclusive Curriculum Supports

For deaf and hard-of-hearing learners, communication access is not a supplementary enrichment issue. It is the instructional pathway itself. ADA guidance is clear that public entities must provide auxiliary aids and services when needed for effective communication, and that the correct aid depends on context and the person's normal communication method. The same guidance identifies qualified interpreters, real-time captioning, written materials, assistive listening systems, and video remote interpreting, while also cautioning that VRI is not effective in all situations and that staff training is necessary for proper operation and quick setup. In school terms, this means communication access must be planned into lessons, discussions, videos, assemblies, parent interactions, and emergency procedures alike.

DCMP strengthens the curricular dimension of that argument. Its federally funded services explicitly support the academic achievement of students with disabilities by providing accessible educational media, high-quality captioning, audio description, and ASL interpretation, as well as professional training for school personnel. DCMP also states that it offers only guidelines developed specifically for captioning and describing educational media used in educational settings, and its Captioning Key is framed as guidance and best practices for captioning educational video. For district practice, that means accessible media use should be a standard instructional expectation, not a case-by-case accommodation activated only when someone remembers to ask.

The Alfonso model therefore proposes a layered approach to communication access. At the core access level, schools identify the learner's primary and secondary communication pathways and ensure the routine availability of the required service such as interpreting, captioning, assistive listening, written reinforcement, or visual demonstration. At the classroom design level, teachers are trained to improve sight lines, reduce simultaneous talking, front-load visual vocabulary, align demonstrations with pauses for interpretation, and structure peer discussion so that the deaf or hard-of-hearing student is not forced to reconstruct fragmented talk after the moment has passed. At the peer and cultural levels, classrooms receive basic sign awareness and communication-norm training so that interaction is not mediated exclusively by adults.

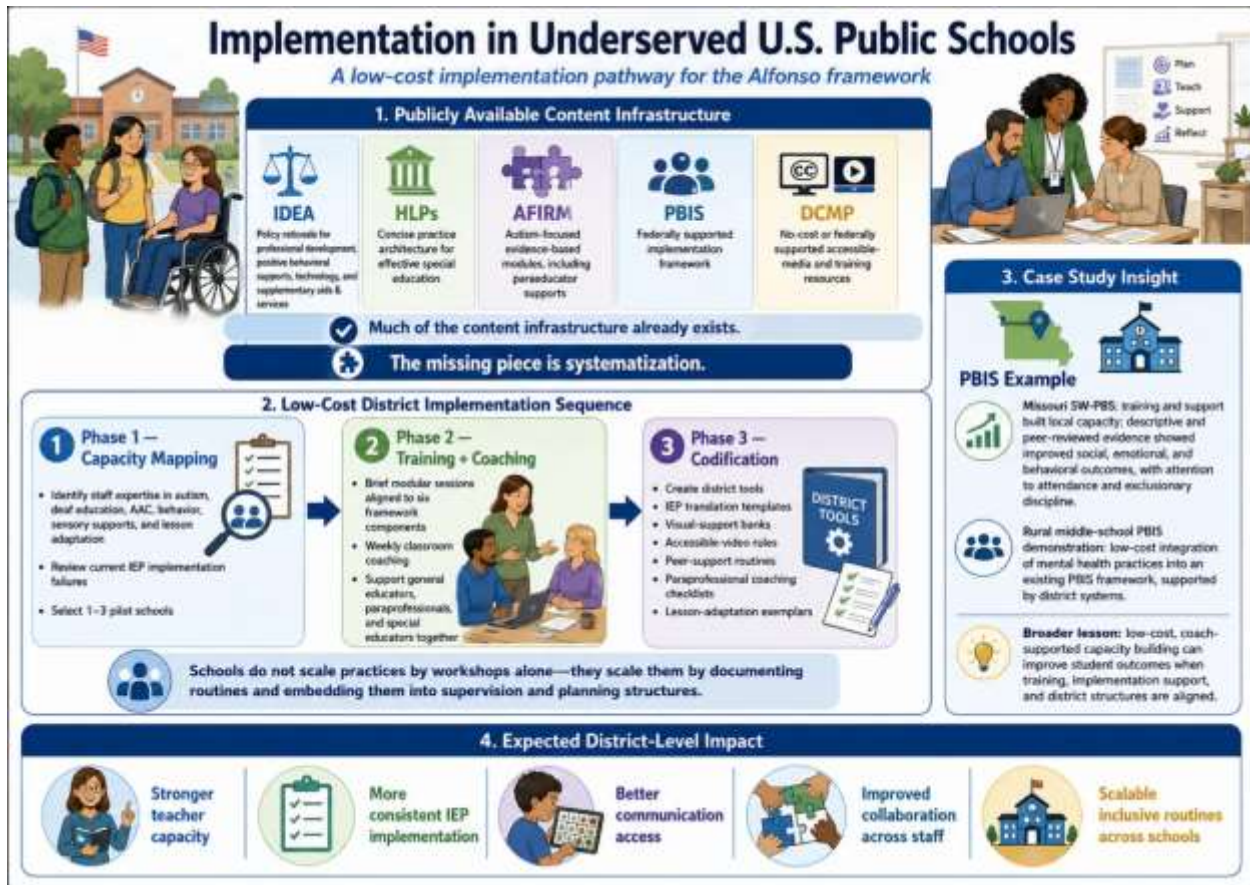
This layered design also benefits students with autism and intellectual disabilities. AFIRM identifies augmentative and alternative communication, functional communication training, visual supports, modeling, and technology-aided instruction among the evidence-based practices educators can use with autistic learners, and IDEA requires consideration of the student's communication needs through the IEP process. Many students with intellectual or developmental disabilities also rely on multimodal communication, alternative response formats, explicit visual organization, or repeated modeling to participate meaningfully. Seen this way, communication access is not a deaf-education silo. It is a cross-disability element of inclusive curriculum support.

UDL provides the broad curricular frame for this approach. Multiple means of representation help teachers consider how content is perceived and understood; multiple means of engagement help structure relevance, predictability, motivation, and emotional capacity; and multiple means of action and expression broaden how students can demonstrate learning. A communication-access plan rooted in UDL is therefore not merely about adding captions or interpreters; it is about designing lessons whose informational, linguistic, and response demands are accessible to different learners from the beginning.

Implementation in Underserved U.S. Public Schools

The most persuasive feature of the Alfonso framework is that it can be implemented in resource-constrained settings without waiting for ideal staffing or expensive program purchases. IDEA already provides the policy rationale for professional development, positive behavioral supports, technology, and classroom-based supplementary aids and services; HLPs already provide a concise practice architecture; AFIRM already provides autism-focused evidence-based modules, including paraeducator supports; PBIS already offers a federally supported implementation framework; and DCMP already offers no-cost or federally supported accessible-media and training resources for school personnel. In other words, much of the content infrastructure is already publicly available. The missing piece in many districts is not a lack of conceptual tools, but a lack of systematization.

A low-cost district implementation sequence can therefore proceed in three phases. **Phase one** is capacity mapping: identify existing staff expertise in autism, deaf education, AAC, behavior, sensory supports, and lesson adaptation; review current IEP implementation failures; and select one to three schools for an initial cycle. **Phase two** is training plus coaching: conduct brief modular sessions aligned to the six framework components and pair them with weekly classroom coaching. **Phase three** is codification: convert what worked into district tools IEP translation templates, visual-support banks, accessible-video rules, peer-support routines, paraprofessional coaching checklists, and lesson-adaptation exemplars. This sequencing matters because schools do not scale practices merely by delivering workshops; they scale them by documenting routines and embedding them into ordinary supervision and planning structures.



A practical U.S. case study for this logic appears in the work of the Center on PBIS. Its 2025 brief on the Missouri Schoolwide Positive Behavior Support Initiative reports that Missouri SW-PBS, supported by the national PBIS center, has provided training and support to build local capacity and that numerous years of descriptive data and a recent peer-reviewed research article show effects on social, emotional, and behavioral outcomes for all students, including students with disabilities; the brief specifically focuses on attendance and exclusionary discipline. A 2026 PBIS practice brief similarly describes lessons from a federally funded rural middle-school demonstration that integrated mental health practices into an existing PBIS framework and highlights the district supports that enabled implementation. The broader lesson is not that every district should duplicate Missouri or a rural middle school model exactly. It is that low-cost, coach-supported capacity building can improve student outcomes when schools align training, implementation support, and district structures.

A legal case study points in the same direction. In *Endrew F.*, the Supreme Court reviewed the case of a student with autism whose parents believed his progress had stalled and whose proposed new IEP closely resembled prior plans. The Court rejected the notion that an IEP offering only minimal benefit was enough and required a program reasonably calculated to

enable progress appropriate in light of the child's circumstances. For districts, the operational lesson is profound: when school systems repeat similar plans without building educator skill, behavioral support, communication access, and instructional adaptation into daily practice, they increase both educational risk and legal risk. Endrew F. is therefore not merely a litigation precedent; it is a warning against thin inclusion systems.

Conclusion

Inclusive special education in the United States now requires a second generation of reform. The first generation established the right to access: FAPE, LRE, procedural safeguards, nondiscrimination, and communication access. The next generation must make that access instructionally durable inside ordinary public schools. The data show why the issue cannot be deferred: millions of students are being served under IDEA, autism prevalence remains high, and the instructional challenge is distributed across all schools, not concentrated only in specialist settings.

The central insight of this white paper is that inclusion fails when expertise remains individualized and succeeds when expertise becomes systemic. The Alfonso Teacher-Capacity Framework proposes exactly that conversion. It takes six practical domains disability awareness, IEP implementation, autism strategies, sign-supported and communication-aware instruction, behavior and sensory supports, and inclusive lesson adaptation and organizes them into a trainable, coachable, scalable educator-support system. The framework is well aligned with IDEA's demand for supplementary aids and services, support for school personnel, positive behavioral interventions and support, and academic and functional progress; with Section 504's parity-of-access standard; with the ADA's effective-communication rule; with UDL's proactive curricular design; and with the field's High-Leverage Practices.

For districts serving students with autism, hearing impairments, and intellectual disabilities, the policy implication is straightforward. The question is no longer whether inclusive schooling is required. It is whether the adult system has been trained to make inclusion educationally real. Dr. Alfonso's proposed model answers that question by turning specialized knowledge into a broader teacher-training and curriculum-support structure that can improve consistency, communication access, and meaningful participation across multiple schools rather than remaining confined to one classroom or one role.

The conclusion follows directly. Dr. Alfonso's proposed work is best understood as a system-building endeavor: designing replicable training and curriculum-support structures that make inclusive instruction more coherent across classrooms, adults, and schools. In underserved districts, that sort of work can be especially valuable because it does not require creating a separate program for each disability profile. Instead, it organizes adult learning around shared-access principles: communication, behavior, curriculum adaptation, progress monitoring, and

team consistency, while still leaving room for individualized supports through the IEP process. Properly implemented, the result is not just stronger specialist practice. It is stronger school capacity.

Prospective Impact and Implementation Considerations

The prospective impact of the Alfonso framework lies in its practical scalability: it offers districts a structured method for strengthening teacher capacity, improving inclusive curriculum delivery, and expanding communication access for students with autism, hearing impairments, and intellectual disabilities, without requiring districts to first achieve ideal staffing levels or adopt costly proprietary programs. By organizing existing federal policy expectations, evidence-based instructional practices, autism-focused training modules, positive behavioral support systems, accessible media resources, and staff development strategies into a coherent implementation model, the framework can help schools move from fragmented compliance efforts toward a more consistent, student-centered system of inclusive education.

At the same time, effective implementation should be calibrated to local conditions. This paper is strongest in addressing U.S. federal law, national technical-assistance resources, and publicly available evidence frameworks. It does not attempt to resolve every state-specific rule, local credentialing requirement for interpreters or paraprofessionals, collective-bargaining provision, or district funding formula, all of which may materially affect implementation. Accordingly, any district rollout of the Alfonso framework should be accompanied by a state-specific policy review, verification of interpreter and paraprofessional qualification requirements, consultation with local labor agreements where applicable, and an audit of related-service capacity, assistive technology access, and professional-development resources.

Properly implemented, the framework has the potential to produce measurable institutional benefits: more consistent IEP implementation, stronger collaboration between special education and general education staff, improved support for paraprofessionals, better communication access for deaf and hard-of-hearing learners, more systematic use of visual and behavioral supports, and greater instructional continuity for students with complex needs. Its value therefore does not rest on creating an entirely new special education system, but on converting available legal, instructional, and technical-assistance resources into a coordinated school-level practice model capable of improving inclusive education across multiple classrooms, schools, and underserved districts.

About the Author

Dr. Raymond V. Alfonso is a special education educator and researcher with extensive professional experience serving learners with autism spectrum disorder, intellectual disabilities, and deaf and hard-of-hearing populations in both the



Philippines and the United States. He holds a Doctor of Philosophy in Education with a major in Special Education and has specialized training in American Sign Language and Filipino Sign Language. Throughout his career, he has designed and implemented individualized education programs (IEPs), adapted inclusive curricula, mentored educators and paraprofessionals, and promoted evidence-based instructional practices that improve educational access for students with complex communication and learning needs. His work focuses on strengthening educator capacity and developing scalable, practical frameworks that advance inclusive education in underserved public schools.

Footnotes

1. National Center for Education Statistics, Students With Disabilities indicator, *Condition of Education*. IDEA states that education for children with disabilities can be made more effective by ensuring access to the general curriculum in the regular classroom to the maximum extent possible, providing aids and supports in the regular classroom, supporting high-quality professional development, using positive behavioral interventions and supports, and supporting technology and assistive technology.
2. U.S. Department of Education, Individuals with Disabilities Education Act, 20 U.S.C. §§1400, 1412, 1414. Congress stated that special education should become “a service for such children rather than a place where such children are sent.”
3. CAST’s UDL Guidelines are organized around multiple means of engagement, representation, and action and expression; CEC/CEEDAR’s High-Leverage Practices are organized around collaboration, data-driven planning, instruction in behavior and academics, and intensifying intervention.
4. <https://sites.ed.gov/idea/statute-chapter-33/subchapter-ii/1412>. IDEA’s LRE provision requires schools to educate students with nondisabled peers to the maximum extent appropriate and to remove them from regular education only when education in regular classes with supplementary aids and services cannot be achieved satisfactorily.
5. IDEA requires the IEP to include the student’s present levels, the effect of disability on progress in the general curriculum, special education and related services, supplementary aids and services, program modifications, and supports for school personnel.
6. In *Endrew F.*, the Supreme Court held that an IEP must be reasonably calculated to enable progress appropriate in light of the child’s circumstances; it rejected a “merely more than de minimis” standard and emphasized that every child should have the chance to meet challenging objectives. Supreme Court of the United States, *Endrew F. v. Douglas County School District RE-1*, 580 U.S. (2017).

7. Section 504's education regulation defines an appropriate education as regular or special education and related aids and services designed to meet the individual educational needs of disabled students as adequately as those of nondisabled students are met. U.S. Department of Justice, ADA Requirements: Effective Communication.
8. Under ADA effective-communication guidance, public entities must provide auxiliary aids and services as needed, considering the nature, length, complexity, and context of communication and the person's normal method of communication; aids may include qualified interpreters, real-time captioning, assistive listening systems, and written materials. CAST, UDL Guidelines. <https://udlguidelines.cast.org/>
9. IDEA requires the regular education teacher, as an IEP team member, to participate in determining positive behavioral supports, supplementary aids and services, program modifications, and support for school personnel. Council for Exceptional Children and CEEDAR, High-Leverage Practices for Students with Disabilities. <https://cedar.education.ufl.edu/wp-content/uploads/2024/03/High-Leverage-Practices-for-Students-with-Disabilities-updated.pdf>