

LEGAL MAILBAG – OCTOBER 9, 2025



By Attorney Rebecca Santiago, Partner, Shipman & Goodwin – GUEST COLUMNIST

The "Legal Mailbag Question of the Week" is a regular feature of the CAS Weekly NewsBlast. We invite readers to submit short, law-related questions of practical concern to school administrators. Each week, we will select a question and publish an answer. While these answers cannot be considered formal legal advice, they may be of help to you and your colleagues. We may edit your questions, and we will not identify the authors. Please submit your questions to: legalmailbag@casciac.org.

Dear Legal Mailbag,

I work with a wonderful special education department with staff who are very conscientious about scheduling annual reviews in a timely manner. Most of the time, our PPTs are very collegial, and the student and parent(s)/guardian(s) leave satisfied. On rare occasions, the school team and the parent(s)/guardian(s) disagree with aspects of the IEP, but we are almost always able to come to an agreement by the end of the meeting.

For the first time in my career, I was part of a PPT with a very hostile and verbally abusive parent. Soon after the meeting started, the parent started raising his voice, making false accusations, using vulgar language and vilifying certain teachers and the participants of the PPT meeting. As the PPT facilitator, I told the parent that we were going to end the meeting unless he started speaking and acting in a more respectful manner. After many expletives, I was told I can't end the meeting because the PPT meeting is required to meet every year and if I did end the meeting and rescheduled it, we would be out of compliance. However, I could not tolerate this parent's maltreatment of the very professional and hard-working staff members present at the meeting.

I understand a parent has a right to disagree and express frustrations, but there needs to be a line that shouldn't be crossed. Given this scenario, can an administrator end a PPT or 504 meeting on the grounds that the parent is acting completely unhinged?

Signed,
PPT Protector

Dear Protector:

There is no part of the Individuals with Disabilities Education Act (IDEA) or Section 504 of the Rehabilitation Act (Section 504) that grants parents a license to be rude, disrespectful, vulgar or disruptive. Consequently, it would be appropriate and reasonable for a PPT facilitator to remind participants in a Planning and Placement Team (PPT) meeting or 504 team meeting that all participants are expected to act professionally and to treat others with respect. However, it is also true that both the IDEA and Section 504 require certain meetings to be held periodically and, if such meetings do not occur, this could constitute a procedural violation. Specifically, under state and federal law, the PPT must meet to review the IEP at least once annually, to determine whether the annual goals for the child are being achieved. 34 C.F.R. § 300.324(b); Regs. Conn. State Agencies § 10-76d-11. Additionally, under the federal and state regulations, the PPT must decide on continuing eligibility for special education services at least once every three years. 34 C.F.R. § 300.303; Regs. Conn. State Agencies § 10-76d-10(e). Thus, it is important to be mindful of these timelines and to convene and complete annual review meetings and triennial review meetings by the required deadlines. Also, parental participation is a key element of the IDEA and parents are expressly included in the list of required members of the PPT Team. 34 C.F.R. § 300.321; 20 U.S.C. § 1414(d)(1).

In light of these legal requirements, it is advisable for the PPT team to make best efforts to fulfill their legal requirements with the parents present in the meeting and participating. Legal Mailbag recommends that the PPT facilitator have a prepared agenda and move through that agenda to fulfill its requirements. If the parents begin to act inappropriately, the facilitator should direct the parents to be respectful so that the team can complete the agenda. However, if, after being given appropriate warnings to improve their behavior, the parents continually act in a manner that is rude, disruptive or abusive, the PPT facilitator may direct the parents that they will be asked to leave the meeting if they cannot act respectfully and that the team will complete the meeting in compliance with the legally mandated timelines without them. In extreme cases, the team may then proceed to complete its work without the parents. In any event, the team must then send the parents prior written notice and IEP documentation after the meeting for their review as required by the IDEA.

Under Section 504, the procedural requirements for meetings are less stringent, with the regulations simply requiring that students be reevaluated “periodically.” The regulations do not define the word “periodically,” except to state that compliance with the IDEA’s timelines would meet the requirement to meet periodically. 34 C.F.R. § 104.35(d). As such, teams have greater flexibility in the timeline for scheduling and completion of 504 meetings. However, as with PPT meetings, parental participation is preferred, so making best efforts to include the parent in the discussion within the IDEA timelines is best, whenever possible.

Fortunately, as you note, in most PPT and 504 meetings, parents and team members work collaboratively, professionally and with mutual respect, but Legal Mailbag hopes that this advice is helpful to you and your team if challenging circumstances like those you described were to occur again.