

The logo consists of the letters 'HPF' in a white, serif font, centered within a white square that has a thin black border.

CHALK TALKS BULLETIN

JUNE 9, 2026
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WHEN IT'S OK TO REPEAT IEP GOALS

In *Endrew F. v. Douglas County Sch. Dist. RE-1*, 60 IDELR 174 (U.S. 2017), the student's parents successfully argued that repeated IEP goals over time showed that the student had not made progress and that he had been denied a Free Appropriate Public Education (FAPE). The U.S. Supreme Court held that a student's IEP must be reasonably calculated to enable the child to make progress and that the student's educational program must be "appropriately ambitious" in light of his or her circumstances. Students with disabilities should have the opportunity to meet challenging objectives.

A recent Court of Appeals case illustrates when it is appropriate to repeat goals. In *Edward M.R. v. District of Columbia*, 125 LRP 4880 (D.C. Cir. 2025), a middle school student with autism and ADHD had difficulty with memory and concentration. When Edward's IEP repeated some goals from the previous year, his parents argued that his IEPs were flawed because the repeated goals showed that he failed to make progress or regressed. However both the district court and the Court of Appeals ruled that the IEPs provided the student FAPE. Repeating goals was reasonable because the student had not achieved them due to his memory issues and individual circumstances. Additionally, the district had included new goals that were appropriately ambitious.

This case demonstrates that if an IEP team needs to repeat goals from one IEP to the next, the team should tie the repetition to the student's needs and also include new goals.

Chalk Talks Summer Bulletins are found on the HPF website here:

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