

## **FOIA REQUEST #2 – FIVE-YEAR SYSTEMIC POLICY, TRAINING, AND INTERNAL COMMUNICATIONS RECORDS**

Illinois Freedom of Information Act (5 ILCS 140)

**Date: November 25, 2025**

To:

FOIA Officer  
Summit Hill School District 161  
20100 South Spruce Drive  
Frankfort, IL 60423  
FOIAOfficer@summithill.org

From:

Kelly Plunkett  
18636 W. Creek Drive  
Tinley Park, IL 60477  
KPlunkett303@gmail.com  
720-527-6674

Re: FOIA Request – Districtwide Policies, Training, Governance, and Internal Communications Records (Five-Year Scope) School Years 2020–2021 through 2025–2026 (to date)

Dear FOIA Officer:

Pursuant to the Illinois Freedom of Information Act, 5 ILCS 140, I request the aggregated, de-identified policy, training, governance, and internal communications records described below.

### **I. Mandatory Compliance Instructions**

- A. The District must respond to each line item individually.
- B. If the District does not maintain a record in the exact form requested, it must produce the nearest equivalent record actually maintained.
- C. If any portion of any item is withheld, the District must provide the specific statutory exemption, the factual basis supporting the exemption, and the portion withheld.
- D. All responsive records must be produced in machine-readable electronic formats (PDF, Word, Excel, CSV, or email exports).
- E. For each section, the District must produce:  
aggregated records, internal communications, directives, summaries, logs, policy manuals, handbooks, guidance documents, presentations, training materials, dashboards, emails, and all nearest-equivalent responsive records.

No student-identifying information is requested or required.

### **II. Section 504 and ADA Policy Framework**

For each school year requested, provide:

- 1. All Board-approved Section 504 policies.
- 2. All Board-approved ADA Title II policies.
- 3. All administrative procedures and building-level guidance relating to Section 504, ADA compliance, disability accommodations, or FAPE-related procedures.

4. Any internal manuals, handbooks, or reference documents provided to principals, assistant principals, counselors, or coordinators regarding Section 504 implementation.
5. Any updates, revisions, draft revisions, or redlines relating to 504/ADA policies during the five-year period.

### **III. Section 504 Governance, Oversight, and Operational Procedures**

Provide all documents, communications, and guidance maintained by the District relating to:

1. The role, duties, and responsibilities of the district-level and building-level 504 coordinators.
2. Any district-issued expectations, directives, or role descriptions for 504 coordinators.
3. Any internal compliance-monitoring or oversight procedures.
4. Any internal audits, compliance checks, or monitoring summaries regarding Section 504 implementation.
5. Any districtwide training requirements for 504 coordinators or staff.
6. All communications from the superintendent, assistant superintendents, or Student Services leadership regarding 504 compliance or expectations.
7. Aggregated counts of all student classroom changes, mid-year reassignments, or schedule adjustments in which the documented reason relates to classroom climate concerns, accommodation implementation issues, disability-related needs, safety or crisis-response considerations, emotional-regulation or behavioral-regulation concerns, instructional mismatch, or parent-reported disability-related issues. All records shall be produced in aggregated, de-identified form with student names redacted.
8. Aggregated counts of any staff performance concerns, corrective actions, reprimands, or other consequences issued relating to Section 504 implementation, crisis response, safety drill response, disability-related accommodations, or parent-reported concerns, as maintained in the District's records.
9. Any district-issued descriptions, directives, expectations, or training materials outlining the role, responsibilities, or decision-making authority of school counselors in supporting students with disabilities, implementing accommodations, participating in re-entry processes, responding to emotional-regulation concerns, or coordinating with Section 504 teams.
10. Any districtwide or building-level documentation, guidance, summaries, or internal communications relating to systemic concerns, trend analyses, or equity impacts affecting students with disabilities, including but not limited to concerns raised by multiple families, staff reports of repeated implementation issues, or patterns of disability-related accommodation failures.

### **IV. Staff Training Records (504, ADA, Behavior, Crisis, Safety, MTSS)**

For each school year, provide:

1. All training materials, presentations, slide decks, videos, handouts, or written content used to train staff on:
  - a. Section 504 implementation
  - b. ADA Title II requirements
  - c. Disability accommodations
  - d. Behavioral incident response
  - e. Crisis intervention
  - f. Safety drills and trauma-informed responses

- g. MTSS implementation
- h. Equity or nondiscrimination requirements
- 2. Any records indicating which staff completed required trainings.
- 3. Any internal communications reminding staff of training requirements.
- 4. Any training materials, guidance documents, or district-issued communications addressing equity, nondiscrimination, or disparate impact considerations in the implementation of Section 504, ADA accommodations, behavioral interventions, safety responses, or crisis procedures.

## **V. Internal Communications – District-Level (Emails, Memos, Directives)**

- A. Produce all emails, directives, memos, or comparable records created, received, or maintained by:
  - 1. The Superintendent
  - 2. Assistant Superintendents
  - 3. Directors of Student Services / Special Services
  - 4. District-level 504 Coordinator
  - 5. District-level administrators overseeing discipline, behavior, crisis, safety, or MTSS
- B. Records responsive to Section V.A must include all communications relating to:
  - 6. Section 504 compliance or noncompliance.
  - 7. Implementation of 504 accommodations.
  - 8. Disability-related behavior incidents.
  - 9. Crisis events, emotional dysregulation events, panic/shutdown events.
  - 10. Safety drills, emergency responses, and trauma-linked events.
  - 11. Attendance flexibility, disability-coded absences, or health-related absences.
  - 12. Building-level concerns raised by staff or parents regarding disability implementation.
  - 13. Any directives issued to building administrators about handling 504 concerns or parent complaints.
  - 14. Any internal discussions referencing systemic compliance challenges.
  - 15. Any internal communications referencing the need to review or revise 504 policies.

No student names are requested. Search terms may include “504,” “plan,” “accommodations,” “implementation,” “behavior,” “crisis,” “MTSS,” “safety,” “emergency,” “drill,” “ADA,” “noncompliance,” “parent concern,” and nearest equivalents.

## **VI. Building-Level Communications (Emails, Memos, Guidance)**

For each school year, provide all building-level communications generated or received by:

- 1. Principals
  - 2. Assistant Principals
  - 3. Building-level 504 Coordinators
  - 4. School Counselors
  - 5. Deans (if applicable)
  - 6. Safety or Crisis Team Leads
- relating to:
- 1. Section 504 implementation.
  - 2. Disability-related behavior or discipline.
  - 3. Emotional regulation incidents.
  - 4. Safety drills and emergency responses.
  - 5. Attendance coding for disability-related absences.

6. Staff questions about accommodation implementation.
7. Internal concerns raised by staff about 504 compliance.
8. Guidance issued to teachers regarding accommodations, interventions, or absences.

No student-specific names are requested; nearest-equivalent aggregated communication categories should be produced.

## **VII. Communications Referencing Disability-Related Concerns or Parent Reports**

Provide all internal communications (district-level or building-level) that relate to:

1. Parent-reported disability-related concerns.
2. Parent reports of anxiety, dysregulation, panic, or trauma-linked events.
3. Parent reports of unmet accommodations.
4. Requests for accommodation review or revision.
5. Any internal follow-up or discussion in response to such reports.

No student names are requested.

## **VIII. Safety, Crisis, and Emergency Communications**

Provide all internal communications relating to:

1. Safety drills (lockdowns, intruder, shelter-in-place, evacuation, building hold, police response).
2. Staff-reported student distress or trauma responses during drills.
3. Crisis team activations and internal follow-up communications.
4. Any safety concerns raised internally regarding students with disabilities.
5. Any directives or guidance issued to staff regarding trauma-informed responses.

## **IX. Format of Production**

All emails must be produced in electronic format (PST, PDF, or native export). Searchable PDFs may be used only where no other electronic format exists. Scanned image-only PDFs are not permitted.

## **X. Statutory Deadlines**

A response is due within five business days under 5 ILCS 140/3(d).

Any extension must comply with 5 ILCS 140/3(e) and cite the specific statutory basis.

## **XI. Duty to Preserve**

The District must preserve all responsive records for the duration of this FOIA request.

Thank you for your attention to this request.

Sincerely,  
Kelly Plunkett