



Surrogate Parent Program Procedures Manual

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Connecticut State Department of Education
Surrogate Parent Program Procedures Manual

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Statutory and Regulatory Authority

The Surrogate Parent Program is a federally mandated program (34 Code of Federal Regulations (CFR) § 300.519) that provides educational advocacy services for children and youth under the jurisdiction of the Department of Children and Families (DCF) (foster children) or an unaccompanied homeless youth (34 CFR § 300.519[f]), who need or may need special education.

State statute (Connecticut General Statutes (CGS) § 10-94g) requires a surrogate parent to be appointed when a child may require special education, or a child who required special education no longer requires such education but requires or may require services under Section 504 of the Rehabilitation Act of 1973, as amended from time to time and

- the parent or guardian of such child cannot be identified;
- the whereabouts of the parent cannot be discovered after reasonable efforts to locate the parent have been made;
- such child is a ward of the state; or
- such child is an unaccompanied and homeless youth as defined in 42 USC 11434a.

Regulations of Connecticut State Agencies (RCSA) §§ 10-94j-1 to 10-94j-9, inclusive, pertain to the appointment and training of surrogate parents.

Please refer to the [Surrogate Parent Statutes and Regulations](#).

The CSDE appointed surrogate parent has decision-making authority as the parent for IDEA Part B decisions.

Initial Surrogate Parent Assignment

The CSDE contracts with individuals, who are available for statewide travel and are consistently available to communicate by e-mail, telephone, virtual platforms, and mail to provide surrogate parent representation to eligible children.

Surrogate parents are independent contractors and are NOT employees of the State Department of Education. The Surrogate Parent Office ensures that at least one contracted surrogate parent is available to accept new cases in each location in which Connecticut children are placed. Often, more than one surrogate parent has responsibilities in the same town and school.

A surrogate parent is assigned within thirty (30) days of receipt of an accurately completed DCF-603 Form submitted by the Connecticut Department of Children and Families (DCF).

Typically, individual assignments are initially based on the town in which the student's educational placement is located and within a fifty (50) mile radius of the surrogate parent's home address. When a child changes residence or school, the current surrogate parent continues

with the student unless the travel time presents extenuating circumstances for the surrogate parent. This ensures stability and continuity for students. If a student's file is closed but is later reopened by DCF, the Surrogate Parent Office will make efforts to appoint the same surrogate parent to the student if that surrogate parent is available to take the assignment.

Notification of Assignment

Upon appointment, the Surrogate Parent Office provides the official Surrogate Parent Appointment Letter by e-mail to:

1. The child's surrogate parent
2. The child's fiscally responsible school district (Nexus)
3. The site of the child's educational services, or if the Surrogate Parent Office does not have that information, the school district which provides educational services to students of the child's age who reside in the same town as the child
4. The DCF social worker or other agency representative involved in the placement (residential or educational) of the student

See [Appendix A](#) for an example of the official Surrogate Parent Appointment Letter.

No Assumption of Assignment

A surrogate parent must not represent a child prior to the issuance of the official Surrogate Parent Appointment Letter. An individual may not provide surrogate parent representation to a child unless that individual has been appointed by the Surrogate Parent Office as the child's surrogate parent.

A surrogate parent must be certain that he or she is authorized by the Surrogate Parent Office to serve as a child's surrogate prior to representing the child and before receiving any confidential information by mail, email, in meetings, or other discussions. Unauthorized representation may result in the termination of the individual surrogate parent's contract.

No Substitutes

A surrogate parent may not arrange for another individual to represent one or more of the students assigned to that surrogate parent during a period in which the surrogate parent is unavailable. Informally arranged "substitute surrogate parents" or "stand-in surrogate parents" are not allowed.

If a child requires services by a surrogate parent and the child's surrogate parent is unavailable to represent the child, the Surrogate Parent Office should be notified immediately. The Surrogate Parent Office may appoint another individual as the child's surrogate parent. Depending upon the situation, the child's new surrogate may remain as the child's surrogate parent even after the previous surrogate parent becomes available. In the event the previous surrogate parent wishes to be reappointed as the child's surrogate parent, approval must be received in writing and a new official Surrogate Parent Appointment Letter must be issued.

Duration of Assignment

The individual who has been appointed as a child's surrogate parent continues to serve as the child's surrogate parent until one of the following occurs:

1. The student has received a regular education diploma, per the exit criterion determined by a PPT, and no one has requested a due process hearing to challenge the end of the student's eligibility for special education.
2. DCF is no longer the guardian of the student.
3. The student is exited from Special Education and 504 services are not required.
4. The student was found ineligible for special education by PPT.
5. The student is at least 18 and indicated a written refusal of surrogate services on the signed [Form SP-500: Continuation Option at Age 18](#).
6. The student is at least 18 years old and no longer in school.
7. The student aged out of school at the end of the school year in which they turned 22.
8. A plenary guardian was appointed to the student, a DDS client. The student has reached eighteen years of age and has an intellectual disability, and a Probate Court has determined that the individual is not legally competent to make informed decisions and has issued a decree appointing a guardian, pursuant to CGS 45a-669 through 45a-684, whose duties include consenting to specifically designed educational programs.
9. A conservator was appointed to the student, a DMHAS client. The student has reached eighteen years of age, and a Probate Court has determined that the individual is "incapable of caring for oneself" and has issued a decree appointing a conservator of the Person, pursuant to CGS 45a-644 through 45a-667, whose duties include consenting to professional care, treatment, or services.
10. The student is deceased.
11. It is determined that a surrogate parent should not have been appointed to represent the child, and the surrogate parent assignment is terminated by the Surrogate Parent Office due to an error.
12. Another individual is appointed by the Surrogate Parent Office to serve as the child's surrogate parent.

Students Exited from Special Education to 504 Plan

For students who are exited from special education as determined by a planning and placement team (PPT) following the determination that the student no longer requires special education and related services, the student will remain eligible for surrogate parent representation if the child requires or may require services under Section 504 of the Rehabilitation Act of 1973 and at least one of the following remains applicable to the child's situation:

- no parent or guardian of the child can be identified or located after reasonable efforts;
- the child is committed to the guardianship of the Commissioner of DCF;
- the Commissioner of DCF is the child's statutory parent; or
- The child is an unaccompanied homeless youth.

Age of Majority

Once a student reaches the age of majority, 18 years of age, unless the student is determined by a court to be incompetent under state law, a school district must provide all notices required under the Individuals with Disabilities Education Act (IDEA) to both the student and the student's parent/surrogate parent. All other rights afforded to parents under IDEA, transfer to the student at the age of majority (18 years of age).

Once a student assigned a surrogate parent reaches 18 years of age, the student is eligible for surrogate parent services through the end of the school year during which the student turns age 22, or until the student graduates from high school with a regular high school diploma, whichever occurs first. When the student turns 18, the surrogate parent's role changes and is defined by a consent outlined in the [Form SP-500: Continuation Option at Age 18](#). The surrogate parent must obtain the signature of the student or plenary guardian or conservator on the SP-500, granting surrogate parent services to continue beyond age 18, and defining the scope of service.

If there has been a change of surrogate parent after the student turns 18, the newly assigned surrogate parent must obtain authorization to advocate by obtaining an updated signed Form SP-500: Continuation Option at Age 18.

As long as the student meets the criteria for surrogate parent eligibility up until their 18th birthday, the child remains eligible for a surrogate parent to ensure that the student continues to have access to a free and appropriate public education (FAPE) until one of the following occurs:

- The student is no longer eligible for special education.
- The student is no longer eligible for services needed for FAPE under Section 504.
- The student is determined by a court to be incompetent, under state law, and a guardian is appointed who has the authority to represent the student in educational matters, and the guardian does not request the services of a surrogate parent for the student.
- The student is determined by a court to be incompetent, under state law, and a plenary guardian or conservator is appointed and does not authorize the services of a surrogate parent for the student.
- The student has discontinued post-majority state agency involvement.

Student "Whereabouts Unknown" or "AWOL"

Occasionally, the whereabouts of a child become unknown, usually because the child has run away from a foster home or another type of residence. In such situations, the surrogate parent must attempt for **no more than three (3) consecutive months (or ninety (90) days)** to determine the location of the child by contacting the Nexus school district, DCF, and any other appropriate agency likely to have knowledge of the child's whereabouts, in writing (by e-mail when possible). The surrogate parent should maintain a record of the attempts to determine the child's whereabouts. If the location of the child cannot be discovered, after **three (3) months (ninety (90) days) of attempts, the surrogate parent shall close the case**, following all case closure procedures outlined on the [Form SP-206: Closed Case](#), and indicate that the child is now "whereabouts unknown," also referred to as "AWOL". The Surrogate Parent Office will close

the case. DCF can request that the case be reopened with the Surrogate Parent Office upon the students' reengagement with DCF.

Drop Out

One of the core goals of the Surrogate Parent Program is to have our students graduate from high school. Occasionally, a child who is eligible for surrogate parent representation will choose to refuse educational services despite the encouragement of the surrogate parent and other individuals.

In such situations, the surrogate parent should maintain a record of the efforts made to encourage the student to remain in school and the student's stated reasons for wanting to drop out. The surrogate parent should specifically inform the student that they are eligible to receive the help of a surrogate parent until the end of the school year in which the student turns 22. If the student refuses educational services, the surrogate parent must close the case. If the student returns to participate in educational services, the reappointment of a surrogate parent can be requested.

Adult Education

Occasionally, a student who is eligible for surrogate parent representation will choose to drop out of school and will enroll in adult education. In such situations, the surrogate parent must notify the Surrogate Parent Office and close the case. If the student re-enrolls in public education, the reappointment of a surrogate parent can be requested. If the PPT develops an individualized education program (IEP) that includes participation in a nontraditional educational program, the surrogate parent representation may continue.

Unable to Advocate Adequately

If an individual indicates to the Surrogate Parent Office that they are unable to advocate adequately as the surrogate parent for a particular child, either due to a possible conflict of interest, extended unavailability, or any other reason, the Surrogate Parent Office will appoint another individual as the child's surrogate parent. In the case of a file transfer, the [Form SP-600: Active File Reassignment Form](#) must be sent to the Surrogate Parent Office with the student file.

Change of Residence, School, or Nexus

The Surrogate Parent Office strives to provide stability and continuity for the children served by surrogate parents. Statewide travel as well as occasional out-of-state travel is necessary, at times, to meet the needs of the child. If the Surrogate Parent Office receives notification that a child has changed the town of residence or school, the surrogate parent remains assigned to the student.

If the student is moved to a foster home or residence out-of-state, the surrogate parent should notify the Surrogate Parent Office and discuss if travel is necessary to contiguous states (Massachusetts, New York, or Rhode Island). If a student is placed in a non-contiguous state, the surrogate parent may communicate with the education staff and participate in PPT meetings with the receiving schools by phone or virtually.

Required Duties and Responsibilities

The surrogate parent is required by contract to perform the duties within the guidelines of the Surrogate Parent Program Procedures Manual.

Surrogate Parent Caseload

1. The surrogate parent shall represent a minimum of twenty (20) cases of assigned students in the educational decision-making process. If a surrogate parent can no longer represent a minimum of twenty (20) cases, the surrogate parent should consult the Surrogate Parent Program Coordinator to determine if an exception can be made.
2. The maximum agreed-upon number of cases that a surrogate parent will accept will not be altered by the surrogate parent without an amendment to the contract.
3. The surrogate parent shall agree to travel up to 50 miles from home address or up to 100 miles round-trip to provide services to an assigned student.
4. The surrogate parent will not refuse assignments based on the location of the school in which the student attends (i.e., urban, suburban, or rural setting) unless the Surrogate Parent Program Coordinator preapproves extenuating circumstances.
5. The surrogate parent shall close cases in adherence to student eligibility and follow all procedures for closing cases. For more information, see [Closing Cases and Providing Student Files to the Surrogate Parent Office](#)

Meeting Requirements

The surrogate parent shall conduct a minimum of three (3) meetings per year for each of the assigned students.

- Of the three (3) meetings, one (1) must be the PPT meeting for the purpose of conducting an annual review. However, surrogate parents are expected and required to attend all PPT meetings.
- Two (2) meetings must be visits or observations with the student.
- **Observations or meetings with assigned students are mandatory.** If the school district where the student is attending refuses to allow the surrogate parent to observe the student in class *or* meet with the student, the surrogate parent should contact the Surrogate Parent Program Coordinator.
- Any additional meetings shall be based on the educational plan and needs of the student.

DCF Meetings

The surrogate parent *may* also be invited to participate in DCF coordinated meetings. Surrogate parents may be required to sign DCF Confidentiality Statements. **Attendance at the following**

meetings is discretionary and may be in person or virtual.

Routine Duties

The surrogate parent shall engage in the following routine duties and responsibilities:

- Record keeping and providing student files to the Surrogate Parent Office at case closing in a timely manner. For more information see, [Student Files and Record Keeping](#) and [Closing Cases and Providing Student Files to the Surrogate Parent Office](#)
- Providing quarterly reports to the Surrogate Parent Office. For more information, see [Required Documentation of Services](#).
- Participating in other duties and activities as reasonably requested by the CSDE Surrogate Parent Program Coordinator.
- Attending and participating in virtual Surrogate Parent Program meetings and trainings arranged by the Surrogate Parent Program Coordinator.

Implementation of Duties and Responsibilities

Communication

Timely and professional communication by e-mail, phone, and virtual platforms is a fundamental part of the surrogate parent's responsibilities. The surrogate parent must:

- Be available by e-mail in a timely manner but should respond no later than 24 hours after receiving e-mails during the work week (Monday through Friday).
- Notify the Surrogate Parent Office in advance of any scheduled vacations.
- Be available for meetings, both planned and unplanned/emergency, on behalf of the student and collaborate with school staff members in arranging for mutually convenient meeting times.
- Cooperate promptly with requests from the Surrogate Parent Office.
- Interact in a professional, courteous, collaborative, and respectful manner at all times.

Student Files and Record Keeping

Surrogate parents must create a file for each student's education records upon the surrogate parent's appointment. If a student was previously assigned to a surrogate parent as has an existing file, the Surrogate Parent Office will provide that file to the newly appointed surrogate parent.

In general, **education records** are those records, files, documents and other materials which (1) contain information **directly related** to a student, and (2) are **maintained** by an educational agency or institution, or by a person acting for such agency or institution. Education records may include information **recorded in any way**, whether typed, handwritten, video or audiotaped, or otherwise. Education records "**directly relate**" to a student when such records contain "**personally identifiable information**" ("PII"). PII includes, but is not limited to: the student's name; a parent's name(s); home address; personal identifier (i.e. Social Security Number or

student number); and date of birth. PII also includes other information that, alone or in combination, is linked or linkable to a specific student, that would allow a reasonable person in the school community, who does not have personal knowledge of the relevant circumstances, to identify the student with reasonable certainty. Surrogate parents should contact the CSDE with any questions regarding what may constitute an education record.

Surrogate parents may receive education records from various sources, such as the CSDE, the school district, other State agencies, or third party educational or therapeutic service providers. Records created by surrogate parents are also generally considered education records, insofar as surrogate parents are contractors with the CSDE. Some exceptions exist, such as “sole possession” records created by surrogate parents to serve as a personal memory aid, if those records are not accessible or shared with others. Again, surrogate parents should contact the CSDE with any questions regarding the maintenance of education records.

Student files must be maintained and updated **throughout** the surrogate parent’s appointment. Files should contain **all education records created or received** by the surrogate parent, unless those records are accessible in CT-SEDS. Education records include, but are not limited to: report cards and progress reports; evaluations; educational and treatment plans; surrogate parent communication logs; site visit and observational reports; and other surrogate parent notes. Importantly, email communications and text messages may be considered education records, and must be maintained, accordingly.

While a student file is closed, or there is a change of surrogate parent, the **entire file** must be returned to the Surrogate Parent Office, along with the appropriate form ([Form SP-206: Closed Case](#) or [Form SP-600: Active File Reassignment Form](#)). The entire file is comprised of both **printed and electronic** education records maintained by the surrogate parent.

If a student whose case is transferred to another surrogate parent is eighteen (18) years of age or older, the newly appointed surrogate parent must obtain the student’s signature on the [Form SP-500: Continuation Option at Age 18](#) in order to access the student’s file. The access rights provided to a former surrogate parent through the Form SP-500: Continuation Option at Age 18 do not “transfer” to the newly appointed surrogate.

Attestation at the time of resignation, nonrenewal or retirement will be required to confirm that all education records have been provided in hardcopy form to the Surrogate Parent Office, and that all education records maintained in electronic form have been destroyed.

If a surrogate parent is nonrenewed or terminated, all education records must be provided to the Surrogate Parent Office in hardcopy form within one (1) month of contract expiration or termination, including summary documentation if requested by the Surrogate Parent Office. All education records maintained in electronic form **must be destroyed** within one (1) month of contract nonrenewal or termination.

Surrogate parent records **may be subject to disclosure** under Federal or State privacy laws. Surrogate parents are strongly encouraged to be thorough, accurate and judicious in creating and maintaining all education records, including but not limited to email correspondence and text

messages. Surrogate parents are also encouraged to maintain **separate email addresses** for surrogate parent activity, and must not share access to such accounts with third parties.

Confidentiality

Federal and State privacy laws require surrogate parents to **always maintain confidentiality** with respect to education records. Confidentiality applies to both **written records and oral conversations**, regardless of context. With respect to education records maintained in hardcopy, electronic or other form, appropriate confidentiality must be maintained at the creation, collection, storage, disclosure and destruction stages.

In general, surrogate parents **must not disclose** education records or PII from such records without appropriate **consent** (i.e. written consent for communications or release of records). **“Disclosure”** means to permit access to, or the release, transfer, or other communication of, PII contained in education records by any means, including oral, written or electronic. Confidentiality applies to information shared or received in various contexts, such as: the Surrogate Parent Program; communications with the CSDE and other State agencies (i.e. the Department of Children and Families (“DCF”)); the planning and placement team (“PPT”) process; communications with the student or a family member(s); and communications with third party educational or treatment providers.

Surrogate parents may disclose education records and PII to educational officials with a **“legitimate educational interest”** in the information, such as members of a student’s PPT. Education records and PII may also be disclosed to the CSDE or another State agency (i.e. DCF) when appropriate. Surrogate parents should contact the CSDE with any questions regarding the potential disclosure of education records or PII.

Surrogate parents must maintain an **access and disclosure log** for each student’s file, and must provide that log to the CSDE as part of the file upon case closure or change in surrogate parent. A newly appointed surrogate parent may receive **necessary** information from a former surrogate parent upon the new surrogate parent’s appointment to a student’s case, if the former surrogate is still under contract with the CSDE. Surrogate parents should be judicious regarding such communications, and should contact the CSDE with any questions.

Case Flow for Initial Referral and Evaluation or Review of Existing IEP

The surrogate parent appointed for a student shall:

1. **Contact the DCF Social Worker** to discuss the case and rationale for requesting a referral for special education evaluation.
2. **Contact the School District** by phone or email to hold an initial discussion about the student’s educational performance and needs, and the necessity for referral. The student may be referred for evaluation by either the school or DCF.

***Note:** If after discussing the student with a district special education representative, the*

district does not find there is academic or behavioral evidence to support the need to evaluate for special education eligibility determination and the student is performing well academically and behaviorally, then the surrogate parent does not need to insist on a referral or initial evaluation, unless there is data and evidence of student need that is contrary to that of the school district.

6. **Send an introductory e-mail** within seven calendar days of a new assignment to the school district (both Nexus district and educational placement district if they are different) which includes the surrogate parent's contact information. See sample Introductory Letter to District in [Appendix B](#):
 - a. Request parent portal access in CT-SEDS. Request copies of all available and relevant educational records pertaining to the student. Any records that are not in CT-SEDS should be included in the student file created by the Surrogate parent.
 - b. The school district, either the Nexus or the educationally responsible district, is responsible for maintaining the student's education records and for providing them to the surrogate parent. The surrogate parent is responsible for getting the student's education records for the surrogate parent's file and for obtaining them in a timely manner, before the first PPT meeting.

***Note:** To request specific confidential DCF records to inform the PPT process, such as DCF evaluations of the student, the surrogate parent must make such written request via email to DCF.RECORDS@ct.gov. These evaluations will go through a legal review and redaction process as necessary and may take up to one month before it can be issued to the requester. For more timely information, contact the DCF social worker to receive a briefing on DCF evaluations to determine if there is information that might inform the PPT process.*

3. **Meet with and/or observe the student** in school within one month of new assignment. If a surrogate parent is appointed to a student at a time when school is not in session, it is expected that the surrogate parent meets or observes the student at the earliest opportunity available. At the first meeting, the surrogate parent may provide the student with their contact information as appropriate to age and development of student, which may include a telephone number and e-mail address. Subsequent contacts with the student should be strategic to answering questions or discussion progress. Other monitoring of the student's progress should be conducted within the scope of the contract.
4. **Participate in referral for Special Education or Review of IEP.** If a decision is made to proceed to a referral, the initial PPT meeting must be requested of the school district responsible in writing by e-mail as soon as possible but in no case more than six (6) weeks after assignment. Prior to the day of the PPT meeting the surrogate parent shall:
 - Review the student's educational records including statewide assessments if available
 - Review any disciplinary history
 - Meet the student and observe the student, if possible

- Talk to the student's primary teacher(s)
- Talk with the DCF social worker
- Talk with the foster parent, if appropriate

If the student has an IEP, and after initial PPT meeting reviewing the IEP and available progress data, it may be necessary to request targeted or additional assessments

Authority to give consent is assigned to the surrogate parent as provided by state and federal law. The types of documents that a surrogate parent has authority to sign consent for are:

- a. Initial evaluation or reevaluation
- b. Provision of initial special education placement and services
- c. Release of educational records

Federal and state law stipulate which members of the PPT are required and discretionary. DCF and the Surrogate Parent Program have developed a [PPT participation chart](#) to assist DCF staff, surrogate parents, and district representatives in understanding which individuals from these agencies are required members and which possible attendees must secure the approval of both DCF and the surrogate parent.

5. **Ensure the student's initial evaluation occurs within the required time frame** that will allow the eligibility PPT meeting to occur at a date which would allow for implementation of an IEP no later than 45 school days after the referral to PPT meeting by the surrogate was made. Refer to [Connecticut Timelines for Special Education Referral and Evaluation](#).
6. **Document decision not to evaluate by the PPT.** If the PPT decides not to evaluate (as part of initial referral), and the surrogate parent agrees, the surrogate parent must include written documentation to support that decision in the student's file. If the PPT decides not to evaluate, and the surrogate parent does not agree, the surrogate parent may request that the meeting minutes reflect disagreement or send an email to the special education supervisor or director to request opportunity to discuss disagreement and request dispute resolution. Refer to the [Complaint Resolution Process Packet and Procedural Safeguards](#).
7. **Ensure the school district implements IEP for the student within 45 school days of referral.**
8. **Document in the student's file findings of ineligibility after evaluation.** If the student is found ineligible for special education, the surrogate parent must close the student's file and provide the file to the Surrogate Parent Office for closure, following case closure procedures. If the student has participated in any of the statewide assessments, copies of those assessments must be provided in the file. Documentation of any disciplinary history should also be provided within the file. If the surrogate parent disagrees with the ineligibility determination, the surrogate parent may either request that the meeting minutes reflect disagreement or send an email to the special education supervisor or director to request the opportunity to discuss the disagreement and pursue dispute

resolution options.

9. **Ensure that the student is receiving appropriate educational services as described in the IEP** and determine if the IEP needs review and revision to ensure that the student's needs are met sufficiently to make educational progress. This requires that the surrogate parent monitor and review the student's progress via progress reports, emails, or calls to the school district's case manager.
10. **Represent the student in the 504 process.** If the student is a student who required special education and the student is determined to no longer require special education but requires or may require services under Section 504 of the Rehabilitation Act of 1973, the surrogate parent may represent the student in the evaluation and planning procedures provided for in Section 504. There may not be a need to continue to advocate beyond the 504 planning and implementation process and the surrogate parent may close the case thereafter. **Students who were ineligible for special education but may be eligible for 504 services are not eligible for a continued surrogate parent appointment and the case must be closed.**
11. **Document closure without need for referral to special education.** If the surrogate parent determines that there is no need to refer the student for a special education evaluation, the surrogate parent must follow case closure procedures and document in writing such a decision and rationale to close the case, including information from:
 - The student's academic performance (e.g., Connecticut statewide assessments, grades, etc.)
 - Documentation of the surrogate parent's observation of the student
 - Teacher report(s) of progress
 - Foster parent or DCF social worker's report
 - Review of educational files
12. **Take formal action to ensure that the student receives appropriate educational services,** when necessary. If the surrogate parent disagrees with the PPT's decision(s) the surrogate parent must promptly take steps to address and remedy the situation to advance the educational outcome for the student, minimize any disruption to their regular school attendance and keep them in school and actively engaged in learning. Prior to filing a state complaint, a request for mediation or a request for a due process hearing, the surrogate parent should speak with the following:
 - school district director of special education against whom the complaint (or mediation or hearing request) would be filed to ensure the director is aware of the concern/s and has an opportunity to resolve them prior to pursuing dispute resolution; and
 - surrogate parent program coordinator to discuss the concerns.

Transition From Birth to Three to Special Education

For children under DCF guardianship, Connecticut uses two different programs to identify who

will serve as the educational decision maker in accordance with IDEA. One program applies to children under age three administered by the Office of Early Childhood (OEC), and the other applies to children ages 3 to 22 administered by the Connecticut State Department of Education (CSDE). Although the CSDE Surrogate Parent Program covers students ages 3 to 22, a surrogate parent may be appointed by the CSDE as early as the child's 30th month. During the period from 30 months of age through 36 months of age, a child may have two educational decision makers. In this situation, the surrogate parent appointed by the CSDE is the decision-making authority for IDEA Part B decisions.

Under the relevant federal law, a surrogate parent is not typically appointed for a child under age three who is in foster care because the foster parent is considered a "parent" for purposes of educational advocacy. In rare cases, eligible children who are younger than three years of age are provided a surrogate parent through the Birth to Three System administered by the OEC. A child requires a Birth to Three surrogate parent if a child:

- Does NOT live with anyone who meets the IDEA definition of "parent", as defined in [Sec. 300.30 Parent - Individuals with Disabilities Education Act](#).
- Is under guardianship of the Commissioner of the Department of Children and Families
- Whereabouts of the parent(s) are unknown.

The procedure for transitioning a potentially eligible child from Birth to Three to the CSDE is as follows:

1. After the child reaches 27 months of age, the Birth to Three Program must:
 - a. obtain consent from the Birth to Three parent, as defined in [Sec. 300.30 Parent - Individuals with Disabilities Education Act](#), to include the school district in the transition planning conference and sends relevant information (e.g., the Individual Family Service Plan (IFSP), evaluation data, health information, etc.) along with the Birth to Three form "3-8" Referral for Preschool Special Education to the school district.
 - b. Inform the LEA of DCF involvement which may include providing a copy of the DCF-603 Form from DCF to the LEA.
2. Upon student record populating in CT-SEDS, the school district must process the referral and verify receipt of a DCF-603 Form from DCF and the appointment of a CSDE surrogate parent. If a student eligible for a surrogate parent is approaching 33 months and a surrogate parent has not been appointed by CSDE, the school district should request that the DCF social worker send a DCF-603 form to surrogate.office@ct.gov and/or complete the [SP-101 District Request for Surrogate Parent](#).
3. Either the surrogate parent initiates a request for a PPT or the school district invites the CSDE appointed surrogate parent to a scheduled PPT meeting to determine whether the child is eligible for preschool special education services. The child's foster parent or Birth to Three surrogate parent, if assigned, may also attend the meeting as an individual who is knowledgeable regarding the child. The school district should also invite the Birth to Three service coordinator or other representative(s) from the Birth to Three team to the referral and eligibility determination PPT.

If the Birth to Three transition conference and referral PPT meeting are held on the same day, the two meetings must be separate, distinct and consecutive meetings. **The only person with**

decision-making authority for IDEA Part B decisions is the CSDE appointed surrogate parent.

Processing and Notification of Change of Residence, School, or Nexus

Changes related to the student's residence, school placement, Nexus, etc. that are not provided to the Surrogate Parent Office by DCF should be reported to the Surrogate Parent Office by the surrogate parent on the [SP-205: Student Information Update](#).

Closing Cases and Providing Student Files to the Surrogate Parent Office

When a student meets the criteria for a case closure, it is the surrogate parent's responsibility to close the case by sending the complete student file to the Surrogate Parent Office within **one week** of determining that closure is necessary (i.e., DCF no longer guardian, exited from or ineligible for special education and no 504 services required, etc.). See [Form SP-206: Closed Case](#) for reasons to close the case.

***Note:** Students who were ineligible for special education but may be eligible for 504 services are not eligible for a surrogate parent appointment and the case must be closed.*

If awaiting further documentation from the school/district, a surrogate parent may hold on to the file for no more than three weeks after determining that the file needs to be closed.

Instructions for closing cases and providing student files to the Surrogate Parent Office:

1. Complete the electronic [SP-205: Student Information Update](#) form to notify the Surrogate Parent Office that you are closing a case.
2. Complete the [Form SP-206: Closed Case](#) and enclose it with the student file, along with any supporting documentation that verifies or explains the reason for case closure. It is the responsibility of the surrogate parent to provide files to the surrogate parent office within one week of notifying the office of file closure unless written permission is given to do otherwise.
3. Provide the file to the Surrogate Parent Office using one of the two methods below:
 1. **Email** to surrogate.parent@ct.gov. Ensure all documents for the student file and the Form SP-206: Closed Case are attached to the email with "Student Name, Case Closure" in the subject line.
 2. **Mail (FedEx)** using previously provided pre-paid Surrogate Parent Program labels:
 - a) Package all documents for the student file and the Form SP-206: Closed Case in an appropriate envelope or box.
 - b) Affix the FedEx label provided by CSDE to package.
 - c) Take package to the FedEx drop-off location near you to be processed. Keep a copy of the mailing receipt for your records as it will have a tracking number on it which can be referenced in the event the package is lost.
 - d) To find the nearest FedEx drop-off location, go to

<https://local.fedex.com/en-us>

The Surrogate Parent Office is transitioning to an electronic filing system and reducing physical student files. If a surrogate parent mails a physical student file to the office, they must ensure that all pages are:

- Neat and organized
- On standard-sized paper, free of tears or frays
- Free of staples

This will allow the office to easily scan and upload the documents into the student's electronic file.

Required Documentation of Services

Surrogate parents are required to provide documentation of services through the completion of Quarterly Activity Reports. Surrogate parents will be provided with their Roster & Quarterly Activity Report on or around the following dates:

Quarter 1: July 1 (For services provided May 1-July 1)

Quarter 2: October 31 (For services provided July 2-October 31)

Quarter 3: January 31 (For services provided Nov 1-January 31)

Quarter 4: April 30 (For services provided February 1-April 30)

Surrogate parents must return their Surrogate Parent Activity Reports to the Surrogate Office within **10 days** of receipt of the Roster & Quarterly Activity Report.

Please note that the CSDE may change the process in which surrogate parents document and report on the completion of the required minimum services. Surrogate parents will be provided with advanced and adequate notice should a change in processes occur.

Contractual Payments

Payments are made to each surrogate parent who has a valid contract with the Connecticut State Board of Education and are subject to the terms outlined in the contract and in this procedure's manual.

The payment calculation will be based on \$1,200.00 per assigned student per year, which shall be calculated and paid quarterly as described in this section during the contract year from July 1 through June 30.

Surrogate parents are paid quarterly, in advance of services. The CSDE shall calculate \$300 (25% of \$1200) multiplied by the number of active students assigned on the quarterly dates listed above. The assigned and active students will be listed on the Roster & Quarterly Activity Report provided by the Surrogate Parent Office to each surrogate parent for review. Surrogate parents are paid for each active student case on the roster dates reflected on the schedule below.

Surrogate Parent Quarterly Payment & Activity Reporting Schedule

Quarter	Approximate Payment Date	Payment for Services Provided During the Following Months	Roster & Quarterly Report Date (Payment Calculated Based on Number of Active students on the following dates)	Quarterly Activity Report Documents Services On the Following Dates
Quarter 1	July 31	July, August, September	July 1	May 1-July 1
Quarter 2	November 30	October, November, December	October 31	July 2-October 31
Quarter 3	February 28	January, February, March	January 31	Nov 1-January 31
Quarter 4	May 31	April, May, June	April 30	February 1-April 30

Additional Stipend for Due Process Hearings

Upon request and submission of official documentation and approval by the Surrogate Parent Program Coordinator, the surrogate parent may be provided a \$250 stipend per student per quarter for participation in extensive due process hearings, which are above and beyond the typical expectations of the contractor. A surrogate parent who supports another surrogate parent in their preparation for due process hearings, manifestation determination reviews, and expulsion hearings may also be provided with a \$250 stipend upon request and approval by the Surrogate Parent Program Coordinator. The Surrogate Parent Program Coordinator shall create and implement a process for surrogate parents to communicate the need for this support and to identify interested surrogate parents who meet the minimum requirements to provide such support.

Conditions to Hold Payment or Non-Renew the Contract

It is the responsibility of each surrogate parent to verify the accuracy of the student caseload rosters, ensure that the required minimum services have been provided, and submit sufficient documentation of required services for each student.

If file closure is necessary, it is the responsibility of the surrogate parent to close the case by sending the complete student file to the Surrogate Parent Office within **one week** of determining that closure is necessary (i.e., DCF no longer guardian, exited from or ineligible for special education and no 504 services required, etc.). See [Form SP-206: Closed Case](#) for reasons to close the case. Cases returned to the surrogate office will be reviewed to confirm they were closed in accordance with student eligibility standards. If it is determined that a surrogate parent received an overpayment for a case that should have been closed, the overpaid amount may be recovered through deductions from future payments or by issuing an invoice for reimbursement.

Furthermore, the contractual payment will be made only if the required minimum services identified in the contract and in this Surrogate Parent Program Procedures Manual have been successfully completed. The Surrogate Parent Office will provide each Surrogate Parent with a

Roster & Quarterly Activity Report each quarter. Surrogate parents must document and report the completion of the required minimum services on the report and return it to the Surrogate Parent Office within 10 days of receipt from the Surrogate Parent Office. Quarterly Activity Reports are reviewed by the Surrogate Parent Program Coordinator to ensure the required minimum services have been successfully completed for each student.

If the surrogate parent demonstrates a pattern of failure to provide required services, comply with documentation requirements or close cases in a timely manner, payment may be withheld and the contract may be subject to non-renewal or termination.

CT-SEDS Surrogate Parent Module- *Pending*

The Surrogate Parent Program anticipates a CT-SEDS Surrogate Parent Module for future case work. With the roll out of the CT-SEDS Surrogate Parent Module, surrogate parents will be responsible for fully and efficiently utilizing the Surrogate Parent Module to complete their work. A pilot year is first expected for a select group of surrogate parents and districts with a future full implementation statewide with all surrogate parents and all districts, schools, APSEPs, Charter Schools, Magnet Schools, and other educational agencies after that. Training on the CT-SEDS Surrogate Parent Module will be provided by the CSDE.

Appendix

Appendix A: Sample Official Surrogate Parent Appointment Letter



STATE OF CONNECTICUT
DEPARTMENT OF EDUCATION



January 21, 2026

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Dear [REDACTED]:

This is to confirm your appointment as surrogate parent for the following student:

Name of Student:	[REDACTED]
Case Number:	[REDACTED]
Date of Birth:	[REDACTED]
Town of Residence:	[REDACTED]
Residence:	[REDACTED]
Nexus Town:	[REDACTED]
Agency Responsible for Education:	[REDACTED]
Education Site:	[REDACTED]
Case Worker:	[REDACTED]
Office Location:	[REDACTED] [REDACTED]

Your appointment as surrogate parent for this student will remain in effect until this student no longer requires a Connecticut-appointed surrogate parent or until you are notified that a new surrogate parent has been appointed for this student.

If you have any questions concerning this assignment, please contact the Surrogate Parent Appointments office at surrogate.office@ct.gov.

Sincerely,

Nicole Deal

Nicole Deal, Education Services Specialist
Surrogate Parent Office

cc: [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Appendix B: Sample Introductory Letter to District and Other Relevant Stakeholders

Dear District Special Education Director:

I am the surrogate parent for John Doe, d.o.b. 1/1/00. I am formally requesting that you email me their SASID number. Also, within the next two weeks (no later than one month) I would like to observe him at his school and meet with him and members of his school- based team, review and obtain copies of his records.

As we move through the year together, I am requesting that you provide me with CT- SEDS parent portal access, report cards, progress reports, statewide assessment results, any disciplinary notices or any other areas of concern regarding John, just as you would a typical parent. This will help me discharge my duties as a surrogate parent in a proper and timely manner. It would be most helpful if you could do as much of this, as is possible, by e-mail as this helps with the record-keeping, but any timely method you chose will be fine.

Below is my contact information. I would appreciate it if you would provide me with the best point of contact at his school. I look forward to working with you this year.
Thank you for your assistance.

Sincerely,

Surrogate Parent Name

Surrogate Parent Address

Phone Number

Email: Name@aol.com

cc: Sam Smith, DCF Social Worker