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Interim State Superintendent of Schools

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January 23, 2012

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Ms. Kalisha Miller, M.Ed.
Director of Special Education
Baltimore County Public Schools
6901 North Charles Street
Towson, Maryland 21204

RE: #12-036
Reference: XXXXX

Dear Parties:

The Maryland State Department of Education (MSDE), Division of Special Education/Early Intervention Services (DSE/EIS), has completed the investigation of the complaint regarding special education services for the above-referenced student. There is a sixty (60) day timeline for completion of the complaint investigation process. However, three (3) days prior to the issuance of the Letter of Findings, both the complainant and the Baltimore County Public Schools (BCPS) submitted additional documentation for consideration in the investigative process. Due to the volume of documents provided by both the complainant and the BCPS, it was necessary to extend the timeline for completion of the investigation, pursuant to 34 CFR §300.152. This correspondence is the report of the final results of the investigation.

ALLEGATIONS:

On November 11, 2011, the MSDE received a complaint from Ms. XXXXXXXXXXXX, hereafter, “the complainant,” on behalf of her son. In that correspondence, the complainant alleged that the BCPS violated certain provisions of the Individuals with Disabilities Education Act (IDEA) with respect to the above-referenced student. The MSDE investigated the following allegations listed below:

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1. The BCPS has not ensured that the Individualized Education Program (IEP) addresses the student's social/emotional/behavioral, speech/language, and fine motor skills needs since November 11, 2010,¹ in accordance with 34 CFR §300.324.
2. The BCPS has not ensured that the IEP addresses the student's executive functioning needs since June 2, 2011, in accordance with 34 CFR §300.324.
3. The BCPS has not provided the student with assistive technology devices and services, as required by the IEP, since the beginning of the 2011-2012 school year, in accordance with 34 CFR §§300.101 and .323.

INVESTIGATIVE PROCEDURES:

1. Ms. Tyra Williams, Education Program Specialist, MSDE, was assigned to investigate the complaint.
2. On November 14, 2011, the MSDE sent a copy of the complaint, via facsimile, to Ms. Kalisha Miller, Director of Special Education, BCPS; Mr. Stephen Cowles, Associate General Counsel, Special Education Compliance, BCPS; and Ms. Sharon Floyd, Supervisor of Compliance, BCPS.
3. On November 17, 2011 and December 2, 2011, Ms. Williams spoke with the complainant by telephone to clarify the allegations to be investigated.
4. Beginning on November 17, 2011, the complainant submitted to the MSDE numerous copies of correspondence, including electronic mail between her and the BCPS staff for consideration in this investigation.
5. On December 5, 2011, the MSDE sent correspondence to the complainant that acknowledged receipt of the complaint and identified the allegations subject to this investigation. On the same date, the MSDE notified Ms. Miller of the allegations and requested that her office review the alleged violations.
6. On December 8, 2011, the BCPS provided the MSDE with documentation from the student's educational record.
7. On December 19, 2011, Ms. Williams and Ms. Anita Mandis, Section Chief, Complaint Investigation Section, MSDE, conducted a site visit at XXXXXXXXXXXXXXXX (XXXXX XXXXXX) to review the student's educational record, and interviewed the following staff:

¹ The complainant alleged violations since the start of the 2009-2010 school year. On December 5, 2011, it was explained to the complainant, in writing, that this office has the authority to investigate allegations of violations of IDEA that occurred not more than one (1) year prior to the date the complaint is received (34 CFR §300.153).

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- a. Dr. William Flook, Supervisor, Psychological Services, BCPS;
- b. Ms. XXXXXXXXXXX, IEP team Chairperson, XXXXXXXXXXX;
- c. Ms. XXXXXXXXXXX, Principal, XXXXXXX;
- d. Ms. Cathy Overtoom, Assistive Technology Chairperson, BCPS; and
- e. Ms. XXXXXXXXXXX, Assistant Principal, XXXXXXX.

Ms. Floyd and Ms. Pamela Weitz, Compliance Support, Special Education Compliance, BCPS, attended the site visit as representatives of the BCPS and to provide information on the BCPS policies and procedures, as needed.

8. At the December 19, 2011 site visit, Ms. Williams requested additional documents that were not in the student's educational record.
9. On December 27 and 28, 2011, Ms. Williams contacted the BCPS staff by telephone and sent electronic mail, respectively, reiterating the request for additional documents.
10. On January 4 and 5, 2012, Ms. Williams sent follow-up electronic mail, again, requesting additional documents from the BCPS staff.
11. On January 6, 2012, the BCPS provided the MSDE with additional documents, but did not provide all of the documents requested. On that same date, the complainant hand-delivered additional documents to MSDE for review and consideration in the investigation.
12. On January 10, 2012, the MSDE notified the parties, in writing, of the need to extend the timeline for completion of the complaint investigation.
13. On January 12, 2012, Ms. Williams conducted a telephone interview with the complainant regarding the provision of Home and Hospital Teaching (HHT) services.
14. The MSDE reviewed documentation, relevant to the findings and conclusions referenced in this Letter of Findings, which includes:
 - a. Correspondence from the complainant alleging violations of IDEA, received by the MSDE on November 11, 2011;
 - b. BCPS Psychological Assessment, dated February 26, 2009;
 - c. BCPS Speech and Language Assessment, dated March 12, 2009;
 - d. BCPS Educational Assessment, dated March 16, 2009;
 - e. BCPS Occupational Assessment, dated February 24, 2010;
 - f. IEP Team Summary, dated May 26, 2010;
 - g. IEP, dated May 26, 2010;

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- h. Private Speech and Language Assessment obtained by the complainant, dated November 30, 2010;
- i. IEP Team Summary, dated January 4, 2011;
- j. IEP Team Summary, dated February 16, 2011;
- k. IEP Team Summary, dated March 2, 2011;
- l. IEP, dated March 2, 2011;
- m. Correspondence from the complainant to the BCPS, dated April 11, 2011;
- n. BCPS Functional Behavior Assessment, dated May 18, 2011;
- o. IEP Team Summary, dated May 18, 2011;
- p. IEP Team Summary, dated June 2, 2011;
- q. IEP, dated June 2, 2011;
- r. BCPS Attendance and Grade Sheet, dated June 17, 2011;
- s. Discipline History Report, dated August 31, 2011 through June 14, 2012;
- t. Assistive Technology Logs, dated September 21, 2011 through December 16, 2011;
- u. Assistive Technology Lesson Plans, dated September 27, 2011 through November 28, 2011;
- v. IEP Team Summary, dated October 13, 2011;
- w. Assistive Technology Follow Up, dated October 27, 2011;
- x. IEP Team Summary, dated November 28, 2011;
- y. BCPS Parental Consent for Evaluations, dated December 5, 2011;
- z. Professional Verification for Emotional Conditions, received by the BCPS December 13, 2011;
- aa. IEP Team Summary, dated December 16, 2011;
- bb. IEP, dated December 16, 2011;
- cc. BCPS Functional Behavior Assessment, dated December 22, 2011; and
- dd. IEP Meeting Notice, dated December 22, 2011.

BACKGROUND:

The student is twelve (12) years old and is identified as a student with “Other Health Impairment,” under IDEA, related to Attention Deficit Hyperactivity Disorder (ADHD), and receives special education instruction and related services. During the period of time addressed by this investigation, the student received special education services as listed below:

- The student attended XXXXXXXXXXXXXXXX (XXXXXXXXXXXX) from the start of the 2010-2011 school year until December 5, 2011.
- The student has not attended school since December 5, 2011.
- On December 13, 2011, the complainant provided verification of the student’s emotional condition and on January 9, 2012 the student began receiving Home and Hospital Teaching (HHT) services.

During the period of time addressed by this investigation, the complainant participated in the education decision-making process, and was provided with notice of the procedural safeguards (Docs. f, i, j, k, o, p, v, x, and aa).

**ALLEGATIONS #1 AND #2: IEP THAT ADDRESSES
SOCIAL/EMOTIONAL/BEHAVIORAL,
SPEECH/LANGUAGE, FINE MOTOR,
AND EXECUTIVE FUNCTIONING NEEDS**

FINDINGS OF FACTS:

Social/Emotional/Behavioral Needs

1. The IEP in effect on November 11, 2010 was developed on May 26, 2010. At the IEP team meeting, the team considered the results of the BCPS speech/language, psychological, educational, and occupational therapy assessments and identified needs for the student in the areas of attention and organizational skills. Annual goals were developed for the student to increase the amount of time he remains on task and improve organizational skills in order to complete assignments in a timely manner. The team decided that the student would be provided with the use of a portfolio to use in order to organize his work, frequent breaks, seating near the teacher to reduce distractions, verbal and visual cues to stay on task, and extra response time. The team also decided that a “behavior intervention counselor” would consult with the student’s classroom teachers on a monthly basis about the strategies being used (Docs. b, c, d, e, f, and g).
2. On April 11, 2011, the complainant requested that a functional behavior assessment (FBA) be conducted (Doc. m).
3. On May 18, 2011, the IEP team convened and began a review of the results of the FBA that was conducted as a result of the April 11, 2011 request. The team did not complete the review of the assessment results due to IEP team time constraints (Doc. o).
4. On June 2, 2011, the IEP team reconvened to complete its review of the FBA. At that meeting, the complainant expressed concerns about the student having “mood swings,” demonstrating lack of motivation to attend school and anxiety about arriving to each class in a timely manner, and having difficulty adapting to stressful situations like “bullying” and “failing grades.” At the time, the student was receiving “Bs” and “Cs” in all of his classes and was attending school regularly. The FBA identified difficulty with attention and organization, but did not identify concerns about the behaviors described by the complainant. The team considered information from school staff that the student’s difficulty with attention and organization was “minimal and inconsistent.” Based upon

this information, the team decided that no additional behavioral supports were required (Docs. p, q, and r).

5. On October 13, 2011, the IEP team convened to discuss the student's behavior because there had recently been two (2) occasions where the student got into fights at school. The team considered information from the complainant that the student feels uncomfortable in school because he is experiencing problems with peer relationships. Based on the information, the team decided to conduct another FBA and the complainant provided written consent (Docs. s and v).
6. On November 28, 2011, the IEP team convened and, again, considered the complainant's concern about the student having "mood swings," demonstrating lack of motivation to attend school, and having anxiety about arriving to each class in a timely manner. School staff reported that they did not observe the student demonstrating these problems, and the team recommended educational, speech and language, psychological, assistive technology, and occupational therapy assessments be conducted, as well as a classroom observation (Doc. x).
7. On December 5, 2011, the complainant provided written consent for assessments recommended at the November 28, 2011 meeting (Doc. y).
8. The student did not return to school after December 5, 2011 (Interviews with the complainant and school staff).
9. On December 13, 2011, the BCPS received verification form the student's private psychologist that the student is unable to attend school due to an "emotional condition" (Doc. z).
10. On December 16, 2011, the IEP team convened and determined the home and hospital teaching (HHT) services to be provided to the student (Docs. aa and bb).
11. On December 22, 2011, the FBA recommended on October 13, 2011 was conducted, based on a review of records and teacher reports of the student's classroom performance. There is no documentation that the IEP team has considered the results to date. The BCPS attempted to schedule a meeting for this purpose on January 9, 2012, but this was not a convenient date for the complainant, and the meeting is being rescheduled (Docs. cc and dd)
12. On January 9, 2012, the student began receiving HHT services in the home (Interview with the complainant).

Speech/Language and Executive Functioning Skills

13. At the May 26, 2010 IEP team meeting, the team considered the results of the BCPS speech/language, psychological, educational, and occupational therapy assessments. The team also considered information from the student's teachers about his classroom performance and the complainant's concerns that she "continue[d] to see [the student] struggle in reading especially in reading comprehension and higher level thinking skills." (Docs. b, c, d, e, f, and g).
14. Assessment reports considered by the IEP team on May 26, 2010 indicate that the student has needs in the area of higher-level critical thinking skills, as well as social-pragmatic, conversational, and nonverbal communication skills. Those reports contain recommendations for strategies that should be used during instruction to address these needs (Docs. c, f, and g).
15. At the May 26, 2010 IEP team meeting, the team developed a goal for the student to understand text by drawing inferences from the material. The team determined that the student would be provided with the services of a scribe to assist him with organizing his thoughts, ideas, and responses to questions into written responses. The team also decided that a speech/language consultant would meet with the student's teachers on a monthly basis to review the student's progress and discuss classroom strategies (Docs. f and g).
16. On January 4, 2011, the IEP team convened in order to address the complainant's concerns about the student's communication needs. At that meeting, the complainant provided the team with the results of an independent speech/language assessment and the team decided to reconvene to consider the assessment results, following a review of the assessment report by the school-based team members (Docs. h and i).
17. On February 16, 2011 and March 2, 2011, the IEP team convened and considered the results of the independent speech/language assessment obtained by the complainant. The assessment identified weaknesses in understanding figurative language, which was consistent with the results of the BCPS assessment previously conducted. The report of the independent assessment indicated that the student's limited attention span negatively affects his expressive language performance, and contained a recommendation for the provision of direct speech/language services to address this need. The team discussed that the weaknesses identified make it difficult for the student to answer critical thinking and higher level comprehension questions both orally and in writing, and decided that the student would be provided with speech/language therapy, as a related service, in addition to special education instruction (Docs. h, j, and k).
18. At the May 18, 2011 and June 2, 2011 meetings, the IEP team considered information from school staff that the student was not choosing to use the services of the scribe and was demonstrating the ability to write independently. Based on this information the team

revised the communication goals, decided to increase the amount of speech/language services to be provided, and decided to discontinue the use of the scribe in order to foster independent work by the student (Docs. o and p).

Fine Motor Skills

19. The assessment data considered by the team on May 26, 2010 indicated that the student had been receiving occupational therapy services to address weaknesses in fine motor, visual perceptual motor, and self care skills. The data further indicated that delays continued in timed tests for motor coordination and manual dexterity that did not affect classroom performance. The data also indicated that the student manages classroom tools without difficulty and demonstrates the ability to complete grade appropriate written work, but that the student should continue to receive occupational therapy services to assist him in using “regular ruled paper” facilitating his transition to middle school (Docs. b, c, d, e, f, and g).
20. At the May 26, 2010 IEP team meeting, the team decided that the IEP would continue to include a goal to improve the student’s fine motor skills and document the recommendation for occupational therapy services to assist him with achieving the goal (Docs. f and g).
21. At the June 2, 2011, IEP team meeting, the team decided that occupational therapy services were no longer needed because the student had achieved the goal to improve fine motor skills by March 31, 2011 (Docs. p and q).

DISCUSSION/CONCLUSIONS:

The IEP must include annual goals and services designed to address the needs that arise from the disability, which are identified from information about the student’s present levels of performance (34 CFR §300.320). When determining the levels of academic achievement and functional performance, the team must consider the evaluative data. This includes, among other things, assessment results, information from the student’s teachers, and the parent’s concerns. In the case of a student whose behavior impedes his learning or that of others, the IEP must include strategies, including of positive behavioral interventions and supports, to address that behavior (34 CFR §300.324).

If it is determined that additional data is required to ensure that all needs are identified, the public agency must ensure that all necessary assessments are conducted. Assessment results must be used by the IEP team in reviewing, and as appropriate, revising the student’s IEP within ninety (90) days of the IEP team meeting in which the team determines that assessment data is required (34 CFR § 300.301 and COMAR 13A.05.01.06).

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The United States Department of Education, Office of Special Education Programs (OSEP), requires that during the investigation of an allegation that a student has not been provided with an appropriate educational program under the IDEA, the State education agency must review the procedures used by a school system to reach determinations about the program. Additionally, the State education agency must review the evaluative data to determine if decisions made by the IEP team are consistent with the data. However, the State education agency may not overturn the IEP team's decisions (OSEP Letter #00-20, July 17, 2000 and Analysis of Comments and Changes to IDEA, Federal Register, Vol. 71, No. 156, p. 46601, August 14, 2006).

Social/Emotional/Behavior Needs

Based on the Findings of Facts #1 - #5, the MSDE finds that the team has considered assessment data, information from the student's teachers and the complainant's concerns, and revised the IEP in effect from November 11, 2010 until October 13, 2011 consistent with the data. However, based on the Findings of Facts #6 - #8 and #11, the MSDE finds that the IEP team has not considered results of the FBA recommended on October 13, 2011, within the required timelines, in order to ensure that all of the student's needs are identified and addressed. Therefore, the MSDE finds a violation occurred with regard to this aspect of the allegation since January 13, 2012, the date by which the FBA was required to be considered by the team.

Speech/Language Needs and Executive Functioning

Based on the Findings of Facts #13- #18, the MSDE finds that the IEP team considered assessment data, including results of a private assessment obtained by the complainant, the complainant's concerns, and information from the student's teachers, and revised the IEP consistent with the data. Therefore, the MSDE does not find a violation occurred with regard to this aspect of the allegation.

Fine Motor Skills Needs

Based on the Findings of Facts #19 - #21, the MSDE finds that the team considered assessment data, information from the student's teachers, the complainant's concerns, and revised the IEP consistent with the data. Based on the Finding of Fact #21, the MSDE finds that the IEP team considered strengths of the student and found that he met the goal for fine motor skills. Therefore, the MSDE does not find that a violation occurred with regard to this aspect of the allegation.

This office understands that the complainant disagrees with the IEP team's decisions about the student's program. In this case, the MSDE did not identify a procedural violation with respect to the speech/language and fine motor skills needs and may not overturn the team's decisions. However, the complainant is reminded that she maintains the right to request mediation or to file a due process complaint in order to resolve any continuing dispute regarding the special education services required by the student.

ADDITIONAL ISSUE: **HOME AND HOSPITAL TEACHING (HHT)
SERVICES**

When a student cannot attend school due to a medical or emotional condition, the public agency responsible for ensuring a Free Appropriate Public Education (FAPE) for the student must determine whether that student requires HHT services. In order to provide HHT services, the public agency must have verification from a physician, psychiatrist, or psychologist, of the medical or emotional condition preventing the student from attending school.

Once it has been verified that a student requires HHT services, those services must be initiated within ten (10) school days of the date of the verification of need (COMAR 13A.03.05.03D, 13A.03.05.04, and 13A.05.01.10). The IEP team must review and revise the student's IEP and determine the instructional services to be provided to the student as long as the student requires HHT services (COMAR 13A.05.01.10(C)(5)).

Based on the Findings of Facts #9 and #10, the MSDE finds that there is documentation that a psychologist verified that the student is unable to attend school due to an emotional condition and that the team reviewed and revised the student's IEP to determine the instructional services to be provided in the student's home. However, based on the Finding of Fact #12, the MSDE finds that the BCPS did not ensure that the student was provided with HHT services by January 4, 2012, the tenth (10th) school day from the date of receipt of verification of the student's emotional condition. Therefore, the MSDE finds there was a two (2) day delay in the provision of services, and that a violation occurred.

ALLEGATION #3: **PROVISION OF ASSISTIVE TECHNOLOGY
SERVICES AND DEVICES SINCE THE START OF
THE 2011-2012 SCHOOL YEAR**

FINDINGS OF FACTS:

22. On May 26, 2010, the IEP was revised to require that the student be provided with the use of a Kurzweil text-to-speech technology device in order to assist him with reading comprehension. The IEP does not require the provision of assistive technology (AT) services (Docs. f and g).
23. While teacher lesson plans indicate that the student was scheduled to begin using the Kurzweil device on September 27, 2011, the student was not trained in the use of the device until October 27, 2011. Additionally, the AT logs document that the student's materials have not been scanned into the device (Docs. t, u, v, and w).

DISCUSSION/CONCLUSIONS:

The public agency must ensure that special education instruction, supplementary aids and services, and related services are available to each student in accordance with the IEP

(34 CFR §§300.101 and .323). In this case, the complainant alleges that the student has not been provided with use of the Kurzweil text-to-speech technology (Doc. a).

AT Services

Based on the Finding of Fact #22, the MSDE finds that the IEP does not require the provision of assistive technology services. Therefore, the MSDE does not find a violation with respect to this aspect of the allegation.

AT Devices

Based on the Finding of Fact #23, the MSDE finds that the student has not been able to use the assistive technology device required on the student's IEP because materials have not been scanned into the device, since the start of the 2011-2012 school year. Therefore, the MSDE finds a violation with respect to this aspect of the allegation.

CORRECTIVE ACTIONS/TIMELINES:

Student Specific

The MSDE requires the BCPS to provide documentation by February 23, 2012 that immediate steps have been taken to ensure that the student is able to use the Kurzweil device in accordance with the IEP, the team has reviewed the results of the FBA and revised the student's program, as appropriate, consistent with the data. In addition, the MSDE requires the BCPS to provide documentation that the team has determined the nature and amount of *compensatory services*² or other remedy necessary to redress the violations identified in this Letter of Findings. The BCPS must provide the complainant with proper written notice of the determinations made at the IEP team meeting, including a written explanation of the basis for the determinations, in accordance with 34 CFR §300.503. If the complainant disagrees with the IEP team's determinations, she maintains the right to request mediation or file a due process complaint, in accordance with the IDEA.

School-Based

The MSDE requires the BCPS to provide documentation by March 23, 2012 of the steps taken to determine if the violations identified in the Letter of Findings are unique to this case or if they represent a pattern at XXXXXXXXXXXX. Specifically, the school system is required to conduct a review of student records, data, or other relevant information to determine if the regulatory requirements are being implemented and must provide documentation of the results of this review to the MSDE. If the school system reports compliance with the requirements, the MSDE

² Compensatory services, for the purposes of this letter, mean the determination by the IEP team as to how to remediate the denial of appropriate services to the student (34 CFR §300.151).

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Complaint Investigation and Due Process Branch staff will verify compliance with the determinations found in the initial report.

If the school system determines that the regulatory requirements are not being implemented, the school system must identify the actions that will be taken to ensure the violations do not recur. The school system must submit a follow-up report to document correction within ninety (90) days of the initial date that the school system determines non-compliance. Upon receipt of this report, the MSDE will re-verify the data to ensure continued compliance with the regulatory requirements. Additionally, the findings in the Letter of Findings will be shared with the MSDE Office of Quality Assurance and Monitoring for Continuous Improvement for their consideration for future monitoring activities.

Systemic

The MSDE requires the BCPS to provide documentation to the MSDE by March 23, 2012 of the steps it has taken to determine if the violations related to the provision of HHT services represent a pattern of noncompliance. Specifically, the school system is required to conduct a review of student records, data, or other relevant information to determine if the regulatory requirements are being implemented and must provide documentation of the results of this review to the MSDE.

If the school system reports compliance with the requirements, the MSDE Complaint Investigation and Due Process Branch staff will verify compliance with the determinations found in the initial report.

Documentation of all corrective action taken is to be submitted to this office to: Attention: Chief, Complaint Investigation/Due Process Branch, Division of Special Education/Early Intervention Services, and the MSDE.

TECHNICAL ASSISTANCE:

Technical assistance is available to the parties through Mrs. Martha J. Arthur, Education Program Specialist, MSDE. Mrs. Arthur may be contacted at (410) 767-0255.

Please be advised that the complainant and the school system have the right to submit additional written documentation to this office, which must be received within fifteen (15) days of the date of this letter, if they disagree with the Findings of Facts or conclusions reached in this Letter of Findings. The additional written documentation must not have been provided or otherwise available to this office during the complaint investigation and must be related to the issues identified and addressed in the Letter of Findings.

If additional information is provided, it will be reviewed and the MSDE will determine if a reconsideration of the conclusions is necessary. Upon consideration of this additional documentation, this office may leave its findings and conclusions intact, set forth additional findings and conclusions, or enter new findings and conclusions. Pending the decision on a

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request for reconsideration, the school system must implement any corrective actions consistent with the timeline requirements as reported in this Letter of Findings.

Questions regarding the findings, conclusions and corrective actions contained in this letter should be addressed to this office in writing. The complainant and the school system maintain the right to request mediation or to file a due process complaint, if they disagree with the identification, evaluation, placement, or provision of a FAPE for the student, including issues subject to a State complaint investigation, consistent with the IDEA. The MSDE recommends that this Letter of Findings be included with any request for mediation or due process.

Sincerely,

Marcella E. Franczkowski, M.S.
Assistant State Superintendent
Division of Special Education/
Early Intervention Services

MEF/tw

cc: Joe A. Hairston
Stephen Cowles
Sharon Floyd
Pamela Weitz
XXXXXXXXXXXX
Anita Mandis
Martha J. Arthur
Tyra Williams