



March 11, 2014

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Ms. Patty Daley  
Director of Special Education  
Howard County Public Schools  
10910 Route 108  
Ellicott City, Maryland 21042-6198

RE: XXXXX  
Reference: 14-055

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. This correspondence is the report of the final results of the investigation.

**ALLEGATIONS:**

On January 10, 2014, the MSDE received a complaint from Mr. XXXXXXXXXXX, and Mrs. XXXXXXXXXXX, hereafter, “the complainants,” on behalf of their son, the above-referenced student. In that correspondence, the complainants alleged that the Howard County Public Schools (HCPS) violated certain provisions of the Individuals with Disabilities Education Act (IDEA) with respect to the student. On January 23, 2014, the MSDE received correspondence from the complainants including an additional allegation of a violation of the IDEA.

Based on those correspondences, the MSDE investigated the following allegations.

1. The HCPS has not ensured that all of the needs that arise out of the student’s disability have been identified and addressed through the Individualized Education Program (IEP) from January 10, 2013<sup>1</sup> to the end of the 2012-2013 school year,<sup>2</sup> in accordance with 34 CFR §§300.320 and .324.

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<sup>1</sup> While the complainants alleged an ongoing violation for a number of years, they were informed, in writing, that the MSDE has authority to investigate allegations of violations that occurred no more than one (1) year from the date the complaint was received (34 CFR §300.153(c)).

2. The HCPS has not ensured that the student has been provided with the special education and related services required by the IEP from January 10, 2013<sup>1</sup> to the end of the 2012-2013 school year,<sup>2</sup> in accordance with 34 CFR §§300.101 and .323.

**INVESTIGATIVE PROCEDURES:**

1. Ms. Christine Hartman, Education Program Specialist, MSDE, was assigned to investigate the complaint.
2. On January 13, 29, and 31, 2014,<sup>3</sup> the MSDE sent a copy of the complaint, via facsimile, to Ms. Patty Daley, Executive Director of Special Education & Student Services, HCPS, and Ms. Judith Pattik, Coordinator of Special Education, HCPS.
3. On January 17 and 28, 2014, the MSDE received correspondence from the complainants amending the remedy requested in the complaint and including an additional allegation.
4. On January 17 and 29, 2014, Ms. Hartman conducted a telephone interview with the student's mother to clarify the allegations to be investigated.
5. On February 4, 2014, the MSDE sent correspondence to the complainants that acknowledged receipt of the complaint and identified the allegations subject to this investigation. On the same date, the MSDE notified the HCPS of the allegations and requested that the HCPS office review the alleged violations.
6. On February 5, 7, 18, and 19, 2014, the MSDE received additional information and documentation from the student's mother, via mail and electronic mail (email).
7. On February 18, 2014, Ms. Hartman conducted an additional telephone interview with the student's mother to clarify the time period covered by the investigation.
8. On February 18, 2014, Ms. Hartman and Mrs. Martha J. Arthur, Education Program Specialist, MSDE, conducted a site visit at the Office of Special Education and Student Services located at the XXXXXXXXXXXXX to review the student's educational record, and interviewed the following HCPS staff:
  - a. Mr. XXXXXXXXXXXX, Special Education Team Leader, XXXXXXXXXXXXXXX; and
  - b. Mr. XXXXXXXXXXXXXXX Principal, XXXXXXXXXXXXXXX.

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<sup>2</sup> In the MSDE's correspondence to the complainants, dated February 4, 2014, this time period was incorrectly identified as continuing "since January 10, 2013." The actual time period covered by the investigation was clarified with both of the parties during the investigation.

<sup>3</sup> On January 13 and 29, 2014, respectively, copies of the correspondences received on January 10 and 23, 2014 were sent to the HCPS. On January 31, 2014, the correspondences were re-sent to the HCPS at the request of the school system.

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Ms. Janet Zimmerman, Instructional Facilitator, HCPS, and Ms. Joyce Agness, Instructional Facilitator, HCPS, attended the site visit as representatives of the HCPS and to provide information on the HCPS policies and procedures, as needed.

9. On February 24 and 28, 2014, and March 5, 6, and 7, 2014, the HCPS provided the MSDE with additional documentation, via email and hand-delivery.
10. On March 4, 5, 6, and 7, 2014, the MSDE requested additional information and documentation from the HCPS, via email and facsimile.
11. On March 7, 2014, Ms. Hartman conducted an additional telephone interview with the student's mother regarding the allegations contained in the complaint.
12. The MSDE reviewed documentation, relevant to the findings and conclusions referenced in this Letter of Findings, which includes:
  - a. Correspondence and attachments from the complainants to the MSDE, received on January 10, 17, and 28, 2014;
  - b. IEP and Behavior Intervention Plan, dated March 13, 2012;
  - c. IEP Team Meeting Report, dated October 24, 2012;
  - d. IEP, dated January 23, 2013;
  - e. IEP for use during Home and Hospital Teaching and IEP Team Meeting Report, dated February 27, 2013;
  - f. IEP Team Meeting Report and Consent for Assessments, dated April 17, 2013;
  - g. IEP, dated May 29, 2013;
  - h. IEP and IEP Team Meeting Report, dated August 14, 2013;
  - i. The student's attendance record for the 2012-2013 school year;
  - j. Application for Home and Hospital Teaching, dated October 25, 2012;
  - k. Correspondence from the student's private psychologist to the HCPS staff, dated October 24, 2012;
  - l. Application for Home and Hospital Teaching, dated February 7, 2013;
  - m. Email correspondence between the HCPS staff, dated February 12 and 21, 2013;
  - n. Home and Hospital Meeting summary, dated May 29, 2013;
  - o. Email correspondence between the HCPS staff and the student's mother, dated November 9, 14 and 29, 2012, January 24, 25, and 30, 2013, and February 11 and 22, 2013;
  - p. Email correspondence from the HCPS staff to the student's private psychologist, dated January 23, 2013; and
  - q. Application for Home and Hospital Teaching re-verification, dated May 30, 2013.

**BACKGROUND:**

The student is fifteen (15) years old and attends XXXXXXXXXX, where he receives special education instruction and related services. He is identified as a student with an Other Health Impairment under the IDEA due to diagnoses of Attention Deficit Hyperactivity Disorder and XXXXXXXXXXXXXXXXXXXX Disorder. He also has diagnoses of Obsessive Compulsive Disorder and Anxiety.

During the time period covered by this investigation, the student had the following educational placements:

- From January 10, 2013 until February 27, 2013, the student attended XXXXXXXXXXXX XXXXX.
- From February 27, 2013 until the end of the 2012-2013 school year, the student was provided with Home and Hospital Teaching (HHT) services in his home.

During the period of time addressed by this investigation, the complainants participated in the education decision-making process and were provided with written notice of the procedural safeguards (Docs. a-h).

**ALLEGATION #1 IDENTIFYING AND ADDRESSING THE NEEDS THAT  
ARISE OUT OF THE DISABILITY FROM JANUARY 10, 2013  
UNTIL THE END OF THE 2012-2013 SCHOOL YEAR**

**FINDINGS OF FACTS:**

1. On March 13, 2012, the student was identified as a student with an Emotional Disability under the IDEA based on diagnoses of Obsessive Compulsive Disorder and Anxiety, and an initial IEP was developed. The March 13, 2012 IEP was the IEP in effect on January 10, 2013 (Doc. b).
2. At the March 13, 2012 IEP team meeting, the team considered assessment data, information provided by the student's teachers, reports from the student's private physician, and parental input. The information indicated that the student has difficulty with social interaction, tends to have a "distorted perception of events" that causes him to use strategies to avoid particular classes and school generally, has "obsessive compulsive worries about cleanliness," and has difficulty with organization skills and task completion. This data included information that the student's anxiety causes him to have physical symptoms which result in lack of attendance, as well as information that the student had been absent 44.5 days and tardy 10 days as of January 2012 (Doc. b).

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3. The IEP reflects that the student's disability affects his ability to interact socially, stay focused and complete tasks, and attend or remain at school on a regular basis. Based on this information, the March 13, 2012 IEP included goals to improve the attendance, task completion, organization skills, social interaction skills, and self-calming skills. The IEP required that the student be provided with special education instruction and counseling as a related service, as well as various accommodations to assist him in achieving the goals. The IEP team also developed a Behavior Intervention Plan (BIP) that required the provision of interventions and supports to address behaviors related to school avoidance, task completion, and class participation (Doc. b).
4. On October 24, 2012, the IEP team convened to review the student's progress based on information from the school staff about his lack of consistent school attendance. The documentation reflects that, by that date, the student had been absent eighteen (18) days, and either arrived late or left early another seventeen (17) days since the start of the 2012-2013 school year. The team considered information from the complainants that, at that time, the student's private physician was indicating that the student could attend school for part of the school day, and that he needed to transition back to a full day program (Doc. c).
5. Based on this information, the team decided that attempts would be made to have the student begin receiving instruction during the last two (2) periods of the school day, and that Home and Hospital Teaching (HHT) services would be pursued to provide the instruction. The team documented its hope that the student would be able to transition back to a full day of instruction by the third (3<sup>rd</sup>) quarter of the school year (Docs. c and i).
6. On October 24, 2012, the complainants began an application for HHT services. On October 25, 2012, the student's private psychologist completed the application stating that the student "requires academic support due to absence related to [an] anxiety disorder." However, while the private psychologist recommended that the student be transitioned back to school on a full time basis by January 1, 2013, the information provided by the private physician does not indicate that the student was unable to attend school (Docs. j and k).
7. There is no documentation regarding whether the HHT services were approved or denied. However, the HCPS staff reports that HHT services were not approved as a result of this application (Interviews with the HCPS staff and review of the student's educational record).

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8. On January 23, 2013, the IEP team convened and considered information from school staff that the student was not consistently attending school during the last two (2) periods of the school day in order to be provided instruction in the Guidance Office. There is no documentation that the team considered positive behavioral interventions or other strategies to address the student's continued problems with attendance or transition back to school (Doc. d and review of the student's educational record).
9. Rather, without documentation of the basis for its decision, the January 23, 2013 IEP team increased the amount of special education instruction and related services to be provided to the student in excess of the number of hours he was scheduled to attend during the last two (2) periods of the school day (Doc. d and review of the student's educational record).
10. On February 7, 2013, the complainants began another application for HHT services. On the same day, the student's private physician completed the section of the application stating that the student's "depressive symptoms [are] interfering with [his] ability to attend school," and indicating that the anticipated duration of the HHT would be thirty (30) days (Doc. l).
11. There is documentation that the HCPS received the HHT application verifying the student's need for home instruction on February 12, 2013, and that the student began receiving instruction in the home on February 19, 2013. However, there is no documentation that the IEP team determined the services to be provided (Docs. e and m, and review of the student's educational record).
12. On February 27, 2013, ten (10) school calendar days following the receipt of the verification of the student's need for HHT services, the IEP team convened and determined the services to be provided in the home. The team also agreed to reconvene within thirty (30) days to review the student's progress. However, there is no information or documentation that a plan was developed for the student to transition back to a school-based program (Doc. e and review of the student's educational record).
13. From January 10, 2013, the start of the time period covered by this investigation, until February 19, 2013, the date on which the student began receiving HHT services in the home, the student did not regularly attend school. Further, there is no documentation that the IEP team considered positive behavioral interventions to address the interfering behaviors (Docs. l, m, and p, and review of the student's educational record).

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14. On April 17, 2013, the IEP team reconvened and recommended that assessments be conducted, including a psychological assessment. The team rejected the complainants' request for a neuropsychological assessment, but did not document the basis for its decision (Doc. f).
15. At the April 17, 2013 IEP team meeting, the team documented its decision that HHT services would continue during the remainder of the school year. However, there was no documentation of a re-verification by the student's psychologist of the student's need for HHT services beyond the original thirty (30) days indicated in the February 7, 2013 verification. There is no documentation that the IEP team developed a plan for returning the student to a school-based program (Docs. f, n, and q, and review of the student's educational record).
16. On May 30, 2013, a re-verification of the student's need for HHT was submitted to the HCPS. On May 29, 2013, in anticipation of the re-verification, the IEP team convened and developed a plan to transition the student back to a school-based program at the end of the 2012-2013 school year (Docs. g and q).
17. On August 14, 2013,<sup>4</sup> the IEP team reconvened and considered the assessment data, including the results of a private neuropsychological assessment obtained by the complainants. The private neuropsychological assessment indicates that the student has Attention Deficit Hyperactivity Disorder and an "arachnoid cyst" in his brain, which causes difficulty with cognitive and neurological functioning. Based on the data, the team identified the student with an Other Health Impairment that impacts written expression, social skills development, attention and organization. Annual goals were added for the student to advocate for adult assistance when feeling anxious in order to increase participation in the academic activities and to compose texts using pre-writing, drafting, revising, and editing strategies (Doc. h).

### **DISCUSSION/CONCLUSIONS:**

In order to provide a student with a Free Appropriate Public Education (FAPE), the public agency must ensure that that an IEP is developed that addresses all of the needs that arise out of the student's disability that are identified in the evaluation data. In developing each student's IEP, the public agency must ensure that the IEP team considers the strengths of the student, the concerns of the parents for enhancing the education of the student, the results of the most recent evaluation, and the academic, developmental, and functional needs of the student. If the student's behavior impedes the student's learning, or that of others, the IEP team must consider the use of positive behavioral intervention and supports, and other strategies, to address that behavior (34 CFR §§300.101 and .324).

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<sup>4</sup> The IEP team, including the complainants, agreed to extend the timeline for reviewing assessment data due to the student's emotional concerns and his inability to attend to task for a sustained period of time (Doc. f).

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If the IEP team decides that a re-evaluation is needed to identify and address the student's needs, the team must review existing data and, based on that review and input from the parents, identify the additional data that is needed. The public agency must ensure that the re-evaluation is sufficiently comprehensive to identify all of the student's special education and related services needs, whether or not commonly linked to the disability category in which the student has been classified. A variety of assessment tools and strategies must be used to gather relevant functional, developmental, and academic information about the student, including information provided by the parents, to assist the team in determining whether the student is a student with a disability and in determining the content of the student's (34 CFR §300.304 and COMAR 13A.05.01.06E).

The IEP team must review the IEP periodically, but not less than annually, to determine whether the annual goals are being achieved. In addition, the IEP team must revise the IEP, as appropriate, to address lack of expected progress, information about the student, and the student's anticipated needs (34 CFR §§300.324).

In Maryland, HHT services may be provided only when there is verification from a licensed physician, a certified school psychologist, a licensed psychologist, or a licensed psychiatrist that the student has a physical or emotional condition that prevents the student from participating in the student's school of enrollment (COMAR 13A.03.05.03 and .04). Without such verification, the IEP team may not determine that a student's educational placement is the home (COMAR 13A.05.01.10). If the student is able to attend a school-based program, the public agency must ensure that the increased supports necessary to implement the IEP are made available in such a placement (34 CFR §§300.320 and .324).

If a student is unable to participate in the student's school of enrollment due to a physical or emotional condition which has been properly verified, the public agency must ensure that HHT services are initiated with ten (10) school calendar days of receipt of the verification (COMAR 13A.03.05.03 and 13A.03.05.04). If a student with a disability is provided instruction at home because of a physical or an emotional condition, 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 medical restrictions apply and develop a plan for returning the student to a school-based program (COMAR 13A.05.01.10(C)(5)).

When the period of treatment or convalescence ends, the IEP team must review and revise the IEP and determine the appropriate placement in the Least Restrictive Environment. If HHT services are to be continued beyond sixty (60) calendar days, the student's need for those services must be re-verified (COMAR 13A.03.05.04). Educational placement in the home for a student with an emotional condition may not exceed sixty (60) consecutive school days (COMAR 13A.05.01.10(C)(5)).



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The intent of the COMAR is to ensure that no student with a disability under the IDEA receives educational services in the home for extended periods of time, or as a long-term placement. Placement in the home is considered to be the most restrictive environment along the continuum of placements because it does not permit the student to receive instruction with other students and denies the student access to the general curriculum.

Prior to the enactment of the COMAR, a significant number of students with disabilities remained in their homes and received a minimum amount of education services solely on the basis of a one-time statement by a school psychologist. Often this occurred for students when the school system was unable or unwilling to identify an appropriate day or residential placement needed for the student to receive a FAPE. Therefore, public agencies are required to make HHT services available to students consistent with both the least restrictive environment requirements of the IDEA and the requirements of the COMAR (34 CFR §§300.114-.116 and COMAR 13A.05.01.10).

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 Educational Agency must review the procedures used by a school system to reach determinations about the program. Additionally, the State Educational Agency must review the evaluation data to determine if decisions made by the IEP team are consistent with the data (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).

Based on the Findings of Facts #1 - #7, the MSDE finds that there is no data to support the IEP team's October 24, 2012 decision that the student could only attend school for the last two (2) periods of the school day. Based on the Findings of Facts #4 - #9, the MSDE finds that there is no documentation that the IEP team considered positive behavioral interventions or other strategies to address the student's interfering behavior of school avoidance at the meetings that took place on October 24, 2012 or January 23, 2013. Accordingly, the MSDE finds that the HCPS did not ensure that the student's IEP in place at the start of the time period covered by the investigation addressed his identified needs. Therefore, the MSDE finds that violations have occurred with respect to this aspect of the allegation.

Based on the Findings of Facts #12, #14, and #15, the MSDE finds that the IEP team did not reconvene to review the student's progress within thirty (30) days of the February 27, 2013 IEP team, as determined by the IEP team. Based on the Findings of Facts #10 - #16, the MSDE finds that the HCPS did not ensure that proper procedures were followed when it continued the student's placement on HHT beyond sixty (60) days without re-verification of the student's need. Based on the Findings of Facts #12 and #14 - #16, the MSDE finds that the HCPS did not develop a plan to transition the student back to a school-based program until May 29, 2013. Therefore, the MSDE finds that violations have occurred with regard to this aspect of the allegation.

Based on the Findings of Facts #14 and #17, the MSDE finds that there is no data to support the April 17, 2013 IEP team decision to reject the complainants' request for a neuropsychological assessment. Therefore, the MSDE finds that there is no documentation that the HCPS ensured that the re-evaluation was sufficiently comprehensive to identify and address the student's needs, and that a violation has occurred.

For the reasons stated above, the MSDE finds that the student has not been provided with a FAPE from January 10, 2013 to the end of the 2012-2013 school year.

**ALLEGATION #2 PROVISION OF SPECIAL EDUCATION AND RELATED SERVICES FROM JANUARY 10, 2013 UNTIL THE END OF THE 2012-2013 SCHOOL YEAR**

**FINDINGS OF FACTS:**

18. From January 10, 2013 to February 27, 2013, the student was required to be provided with ten (10) hours of special education instruction per week in the Guidance Office (Docs. c-e).
19. There is documentation that the school system made sufficient staffing available to provide the amount of special education instruction services required for only a portion of the time period during which he was to receive instruction in the Guidance Office (Docs. c, d, and o).
20. On February 27, 2013, the IEP team determined the services which were to be provided to the student at home for the thirty (30) day period for which verification was received (Doc. e).
21. From the end of the thirty (30) day time period for which HHT was verified, until the end of the 2012-2013 school year, the student continued to be provided with HHT services in the home without re-verification of his continued inability to attend school by his psychologist, and was not provided with the amount of special education and related services in the educational placement that was required by the IEP (Docs. e, f, i, l, and n).

**DISCUSSION/CONCLUSIONS:**

In order to provide a FAPE, the public agency must also ensure that the student receives the special education and related services that are required in the IEP (34 CFR §§300.101, and .323). Therefore, each public agency must take appropriate steps to recruit, hire, train, and retain appropriate staff to provide special education and related services to students with disabilities (34 CFR §300.156).

Based on the Findings of Facts #18 and #19, the MSDE finds that there is documentation that the HCPS did not have sufficient school staff to provide the student with the amount of services required for the full period of time during which he was to receive instruction in the Guidance Office, from January 10, 2013 to February 27, 2013.

Based on the Findings of Facts #9, #20, and #21, the MSDE further finds that, because the student's need for HHT services were only verified for a period of thirty (30) days, and he continued to receive HHT services until the end of the school year, the HCPS did not ensure that the student received the services required by the IEP in the educational placement required by the IEP. Therefore, the MSDE finds that violations have occurred with regard to this allegation.

### **CORRECTIVE ACTIONS/TIMELINES:**

#### **Student-Specific**

The MSDE requires the HCPS to provide documentation by May 15, 2014, that an IEP team meeting has been convened to determine the amount and nature of *compensatory services*<sup>5</sup> or other remedy for the loss of a FAPE from January 10, 2013 to the end of the 2012-2013 school year.

The HCPS must provide the complainants with proper written notice of the determinations made at the IEP team meeting, including a written explanation of the basis for the determinations, as required by 34 CFR §300.503. If the complainants disagree with the IEP team's determinations, they maintain the right to request mediation or file a due process complaint in order to resolve the dispute, in accordance with the IDEA.

#### **School-Based**

The MSDE requires the HCPS to provide documentation by June 1, 2014 of the steps it has taken to ensure compliance by XXXXXXXXXXXXXXXXXXXX School staff with the IDEA and related State requirements listed below.

1. That the IEP team reviews and revises, as appropriate, each student's IEP to address the student's identified needs and interfering behaviors, in accordance with 34 CFR §300.324.
2. That proper procedures are followed with regard to the provision of HHT services:
  - To ensure HHT services are provided for the amount of time verified by the physician, in accordance with COMAR 13A.03.05.03 and 13A.03.05.04.

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<sup>5</sup> 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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- To ensure that an IEP team is convened to determine the services to be provided on HHT and develop a plan for returning the student to a school-based program, in accordance with COMAR 13A.05.01.10(C)(5).
  - To ensure that students receiving HHT services receive no more than sixty (60) calendar days of HHT unless the student's need for those services have been re-verified, in accordance with COMAR 13A.03.05.04.
  - To ensure that students receiving HHT services based on an emotional condition, which prevents them from attending a school-based program, receive no more than sixty (60) continuous school days of HHT, in accordance with COMAR 13A.05.01.10(C)(5).
3. That each re-evaluation is sufficiently comprehensive to identify all of the student's needs, in accordance with 34 CFR §300.324
  4. That each student with a disability under the IDEA is provided with the amount of special education instruction and related services in the educational placement required by the IEP, and that sufficient staffing is maintained to ensure that all students are provided with the special education and related services required by the IEP, in accordance with 34 CFR §§300.101, and .323.

Documentation of all corrective actions taken is to be submitted to this office to the attention of the Chief of the Family Support and Dispute Resolution Branch, Division of Special Education/Early Intervention Services, MSDE.

**TECHNICAL ASSISTANCE:**

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

Please be advised that both the complainants 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.

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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 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 complainants 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 this State complaint investigation, consistent with the IDEA. The MSDE recommends that this Letter of Findings be included with any request for mediation or a due process complaint.

Sincerely,

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

MEF/ch

cc: Renee A. Foose  
Judith Pattik  
Janet Zimmerman  
XXXXXXXXXX  
XXXXXXXXXXXXXXXXXX

Dori Wilson  
Anita Mandis  
Christine Hartman  
Martha J. Arthur