



Lillian M. Lowery, Ed.D.  
State Superintendent of Schools

200 West Baltimore Street • Baltimore, MD 21201 • 410-767-0100 • 410-333-6442 TTY/TDD • MarylandPublicSchools.org

July 20, 2015

Rachel Russo, Esq.  
SJP Fellow/Staff Attorney  
School Justice Project  
1380 Monroe Street, NW, Box 410  
Washington, DC 20010

Mrs. Joan Rothgeb  
Director of Special Education  
Prince George's County Public Schools  
John Carroll Elementary School  
1400 Nalley Terrace  
Landover, Maryland 20785

RE: XXXXXXXXXXXXXXXX and  
Similarly Situated Students  
Reference: #15-075<sup>1</sup>

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.

**ALLEGATION:**

On May 21, 2015, the MSDE received a complaint from Rachel Russo, Esq., the School Justice Project, hereafter, “the complainant,” on behalf of the above-named student and similarly-situated students at the Prince George’s County XXXXXXXX. In that correspondence, the complainant alleged that the Prince George’s County Public Schools (PGCPS) violated certain provisions of the Individuals with Disabilities Education Act (IDEA) with respect to the students.

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<sup>1</sup> The correspondence initiating the State complaint investigation, dated May 26, 2015, contained a typographical error indicating the Reference number as #15-074.

The MSDE investigated the allegation that the PGCPS has not ensured that the students at the XXXXXXXXXXXXXXXX<sup>2</sup> have been provided with a Free Appropriate Public Education (FAPE) since May 21, 2014, in accordance with 34 CFR §§300.2 and .323., and COMAR 13A.05.01.09.

**INVESTIGATIVE PROCEDURES:**

1. On May 21, 2015, the MSDE sent a copy of the complaint, via facsimile, to Mrs. Joan Rothgeb, Director of Special Education, PGCPS; Dr. LaRhonda Owens, Supervisor of Compliance, PGCPS; Ms. Gail Viens, Deputy General Counsel, PGCPS; and Ms. Kerry Morrison, Special Education Instructional Specialist, PGCPS.
  2. On May 26, 2015, the MSDE sent correspondence to the complainant that acknowledged receipt of the complaint and identified the allegation subject to this investigation. On the same date, the MSDE notified the PGCPS of the allegation and requested that the PGCPS review the alleged violation.
  3. On June 16, 2015, Ms. Anita Mandis, Section Chief, Complaint Investigation Section, MSDE, conducted a telephone interview with the complainant about the allegation being investigated. On the same date, the PGCPS provided the MSDE with information and documents to be considered.
  4. On July 8, 2015, Ms. Mandis and Ms. Sharon Floyd, Education Program Specialist, MSDE, conducted a site visit at the PGCPS Central Office to review records and interviewed the following:
    - a. Ms. XXXXXXXX, Special Education Teacher;
    - b. Dr. XXXXXXXXXXXX, General Education Teacher;
    - c. Ms. XXXXXXXXXXXXXXXX, Unit Chief, Adult Learning Center, Prince George's County XXXXXXX (PGCXXXX); and
    - d. Mr. XXXXXXXX, School Psychologist.
- Dr. Owens and Ms. Morrison attended the site visit as representatives of the PGCPS and to provide information on the school system's policies and procedures, as needed.
5. On July 9, 13, and 16, 2015, the PGCPS provided documentation to the MSDE to be considered.
  6. On July 17, 2015, Ms. Mandis conducted a telephone interview with the complainant.

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<sup>2</sup> Referred to in the May 26, 2015 MSDE correspondence as the Prince George's County XXXXXXXX.

7. The MSDE reviewed documentation, relevant to the findings and conclusions referenced in this Letter of Findings, which includes:
  - a. Memorandum of Understanding (MOU) between the Prince George's County Department of Corrections and the PGCPs, signed in November 2010;
  - b. The IEP for the named student, developed in the District of Columbia (DC IEP), dated March 15, 2013;
  - c. Diagnostic pretest administered to the student and work samples;
  - d. Electronic mail (email) messages between the complainant and the Prince George's County XXXXXXXXXXXX (PGCXXX) staff and staff notes, dated May 27, 2014, February 11 and 12, 2015, and March 13, 2015;
  - e. Correspondence from the complainant alleging violations of the IDEA, received by the MSDE on May 21, 2015;
  - f. Prior Written Notice, dated February 18, 2015;
  - g. Daily attendance sheets for class for the month of March 2015;
  - h. Email message among the PGCPs staff, dated June 15, 2015;
  - i. Email message from the PGCPs to the MSDE, dated June 16, 2015;
  - j. The PGCPs procedures for providing a Free Appropriate Public Education (FAPE) to students at the XXXXXXXXXXXXXXXXXXXXXXXXXXXX;
  - k. The form used to collect education information upon arrival at the XXXXX XXXXXXXXXXXXXXXXXXXX;
  - l. The form used to request educational records; and
  - m. The PGCXXX Inmate Handbook.

**BACKGROUND:**

The named student is twenty-one (21) years old and is a resident of the District of Columbia, where he is preparing for the general educational development (GED) test (Doc. e and interview with the complainant).

The student was placed at the XXXXXXXXXXXXXXXXXXXXXXXXXXXX from May 24, 2014 to April 10, 2015. At the time that he entered the XXXXX, the student was identified as a student with an Emotional Disability under the IDEA, and had an IEP from the District of Columbia (DC IEP) that required the provision of special education and related services (Docs. b, d, e, and f).

**FINDINGS OF FACTS:**

**Locating and Identifying Students with Disabilities**

1. XXXXXXXXXXXXXXXXXXXXXXXXXXXX is a local adult correctional facility operated by the Prince George's County XXXXXXXXXXXX (PGCXXX) (Docs. a and m).

2. Upon entry into the facility, the PGCXXX asks individuals to complete a form that includes information about the last school attended and whether they have received special education services. For those who identify themselves as students with disabilities, the PGCPS requests educational records from their last school of attendance (Docs. h, k, l, and interview with the PGCXXX and PGCPS staff).
3. The PGCXXX provides the PGCPS with a list of the names and birthdates of all individuals under twenty-one (21) years old. The PGCPS staff conduct a search of the Maryland On-line IEP system in order to check to see if any of the individuals are students who have been identified with disabilities. However, no additional steps are taken to verify information provided by students who do not identify themselves as students with disabilities and come from other States and Maryland counties that do not participate in the Maryland On-line IEP system. In addition, no additional steps are taken to obtain information from or about those students who do not complete the form on which educational information is requested (Docs. d, i, and interview with the PGCXXX and PGCPS staff).
4. A review of the documentation for students with disabilities who have been provided with special education instruction during the 2014-2015 school year reflects that students from other states and the District of Columbia have been provided with special education instruction at the facility (Review of the student database).

### **Provision of Special Education and Related Services**

5. The PGCPS procedures indicate that Court Orders are obtained, as necessary, in order to determine who has educational decision-making authority for each student and that procedures are followed for appointment of parent surrogates to protect the right of students with disabilities. However, documentation and interview information reflect that students with disabilities who were sixteen (16) years old or older (who were no longer of compulsory school attendance age in Maryland) are permitted to elect not to receive educational services (Docs. f, j, k, and interview with the PGCPS staff).
6. The Memorandum of Understanding (MOU) between the PGCXXX and the PGCPS states that the PGCXXX will provide appropriate work space for teachers, ensure that no more than fifteen (15) students are allowed per teacher, provide guidance related to the policies and procedures of the PGCXXXXXXXXX, notify the PGCPS staff of any substantial changes that may affect the housing or instruction of the students, and ensure that quarterly meetings are held with the PGCPS. The MOU states that the PGCPS will provided each student with a minimum of 240 minutes (4 hours) of instruction per day or three (3) eighty (80) minute blocks of instruction per day, provide teachers with professional development and supervision, and provide students with disabilities a FAPE (Doc. a).

7. The PGCPS and PGCXXX staff report that the PGCXXX makes students with disabilities who are under the age of eighteen (18) available for the provision of special education instruction for fifteen (15) hours per week, to be provided in two (2) ninety (90) minute sessions per day. They further report that the PGCXXX makes students with disabilities ages 18 to 21 available for instruction for three (3) days per week for a total of seven (7) hours and thirty (30) minutes per week. However, there is no documentation that the PGCXXX limits the amount of instruction that can be provided to students per week (Docs. a, m, and interviews with the PGCPS and the PGCXXX staff).
8. The PGCXXX XXXXX Handbook indicates that students may be placed in the administrative segregation housing area (segregation) resulting from sanctions imposed as a result of committing an offense in the facility. The Handbook reflects that, while in segregation, the student is permitted one (1) hour of recreation per day, and that all other privileges are withheld. It also reflects that students may be permanently assigned to segregation for specific offenses. The Handbook describes privileges as recreation, commissary, visiting, worker status, work detail, television, game activities, and "other specialized programs." It does not specifically identify educational services as a privilege that is withheld on a temporary or permanent basis (Doc. m).
9. The MOU states that at least once per month, the PGCPS and the PGCXXX staff will meet to discuss general issues related to the educational program and that "minutes" will be maintained of the meetings by both agencies. There is no documentation that the PGCPS has explored with the PGCXXX options for the provision of educational services when students are placed in segregation (Doc. a and interviews with the PGCPS and the PGCXXX staff).
10. There is no documentation that an IEP team is convened to review and revise, as appropriate, the IEP for a student who has missed a significant amount of instruction during periods of time that they are placed in segregation without the provision of educational services (Interviews with the PGCPS and the PGCXXX staff).

### **IEP Implementation for the Named Student**

11. On May 24, 2014, the named student entered the XXXXXXXXXXXXXXXXXXXXXXXX. He did not complete the form requesting information about the last school attended and whether he was identified as a student with a disability, and no steps were taken to obtain this information from the student's parent (Docs. d, e, f, and interviews with the PGCPS and the PGCXXX staff).
12. On February 11, 2015, the complainant provided the PGCXXX with a copy of the named student's DC IEP. In electronic mail (email) correspondence to the complainant, the PGCXXX staff stated:

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We will need an updated IEP in order to proceed. Once we have received the updated IEP we can start [the student] in the Adult Special Education Program.

The PGCPS staff was copied on the email correspondence (Doc. d).

13. On February 11, 2015, in response to the email from the PGCXXX staff, the complainant sent an email stating:

The document you received is [the student's] most recent IEP. He has been incarcerated since the spring of 2014. Please let me know if you need additional information to complete enrollment in the Adult Education Program. I anticipate that we will update his IEP once he is officially enrolled (Doc. d).

14. On February 12, 2015, the PGCXXX staff responded to the complainant by email stating:

We will enter [the student] into the incarcerated XXXXXXXX/XXXXXXXXXXXXXXXXXXXXXXXXXXXX (XXX/XXXX). This is an alternative educational site through the Prince George's County Public Schools. He will have [m]ath and English 3 days a week for a total of 7.5 hours... We will also need a transcript to determine [the student's] English and [m]ath needs (Doc. d).

15. On February 12, 2015, the named student's educational record was requested by telephone from his last school in the District of Columbia (Doc. d).
16. From February 14, 2015 to March 6, 2015, the PGCXXX placed the named student in segregation. During this period of time, he was not provided with educational services (Doc. f and review of housing history log and interview with the PGCPS staff).
17. The named student started receiving instruction on March 9, 2015 and was released from the facility on April 10, 2015 (Docs. c - g).
18. The named student's DC IEP states that the student was participating in a general educational development (GED) test prep course and was required to be provided with fifteen (15) hours per week of special education instruction in the general education classroom and one (1) hour per week of behavioral therapy as a related service in a separate special education classroom. It also required consultative speech/language services. The IEP included annual goals for the student to improve his math, reading, written language, speech/language, and social, emotional, and behavioral skills (Doc. b).

19. On February 18, 2015, the PGCPS amended the named student's DC IEP without convening an IEP team or obtaining the agreement of the student's parent. While the PGCPS staff report that they were unable to locate the named student's parent, no steps were taken to obtain a parent surrogate for the student (Doc. f and interviews with the PGCPS and the PGCXXX staff).
20. On February 18, 2015, the DC IEP was amended to decrease the amount of special education instruction to be provided to seven (7) hours and thirty (30) minutes per week of special education instruction in math and English, and to change the educational placement from the general education classroom to "a self-contained education setting." The basis for the revisions was documented as follows:

[The student] has been identified as a school age special education student currently being detained in the Prince George's Department of Corrections. The proposed changes will reflect the environment change and services to be given while incarcerated (Doc. f).
21. There is no documentation that the District of Columbia provided the named student's educational record in response to the February 12, 2015 request or that additional efforts were made to obtain the record. Because the PGCPS staff did not have the named student's transcripts, the student was provided with work sheets to complete in general math and English based on the results of a diagnostic pretest that was administered (Docs. c, f, and interviews with the PGCPS and the PGCXXX staff).
22. The named student was not enrolled in a GED prep course consistent with the DC IEP. The PGCPS does not provide access to these courses. The PGCXXX, which is responsible for instructional services to nondisabled students, provides access to such courses for disabled and nondisabled students, but enrollment is limited (Interview with the PGCPS and PGCXXX staff).
23. The class attendance records for the month of March 2015 reflect that the named student was in class three (3) days per week, but does not indicate the amount of time in class each day (Doc. g).
24. Behavioral therapy was not provided as a related service consistent with the DC IEP. The PGCPS staff report that this is because they believed that this need could be addressed through classroom instruction. However, the Prior Written Notice document generated following the amendment of the IEP on February 18, 2015 states that counseling services would be continued, but would be decreased to thirty (30) minutes per week (Doc. f and interview with the PGCPS staff).
25. There is no documentation that consultative speech services were provided (Interview with the PGCPS staff).

## **LEGAL REQUIREMENTS:**

### **Preliminary Discussion**

The implementing regulations of the IDEA explain that the federal requirements related to the education of students with disabilities apply to all political subdivisions of a State that are involved in the education of students with disabilities, including those in State and local juvenile and adult correctional facilities. These regulations require that each education program for students with disabilities meet the educational standards of the State Education Agency (SEA) (34 CFR §§300.2 and .149). The IDEA provides for exceptions to these requirements under circumstances where there is a bona fide security or compelling penological interest that cannot otherwise be accommodated, but only in the case of students who are convicted as adults and incarcerated in adult prisons [emphasis added] (34 CFR §300.324).

In Maryland, the local education agency is required to ensure the provision of a FAPE to students with disabilities incarcerated in local adult correctional facilities located within the jurisdiction of the local education agency (COMAR 13A.05.01.09). Therefore, the PGCPS is responsible for locating and providing a FAPE to students with disabilities placed at the XXXXXXXXXXXXXXXXXXXX and must ensure that those students have access to instruction to allow them to achieve credit requirements necessary to progress towards the State standards for graduation from a public high school (34 CFR §§300.101 - .103 and .111).

To be awarded a Maryland High School Diploma, a student must have earned a minimum of 21 credits, including specific core credits in English, fine arts, mathematics, physical education, science, social studies, and technology education. Core credits must also be earned in world language or American Sign Language, advanced technology education, or a career and technology program (COMAR 13A.03.02.04). In order to provide students with sufficient time to meet these requirements, public schools in Maryland must be open for pupil attendance for at least 180 actual school days and a minimum of 1,080 school hours during a 10-month period in each school year (Md. Code Ann., Educ. §7-103).

A Maryland High School Diploma by Examination may be awarded for satisfactory performance on approved general educational development (GED) tests if a student meets specific requirements (COMAR 13A.03.02.09). There are various resources available to assist students in preparing to take the GED test. These include books and DVDs offering in-depth review and study tips, Maryland Online GED Preparation Classes offered by the Maryland Department of Labor, Licensing and Regulation and the United States Department of Education, and various websites that offer practice tests ([www.prattlibrary.org](http://www.prattlibrary.org)).



### **Provision of a FAPE to Transferring Students**

If a student with an IEP transfers to a new public agency in another State, the new public agency (in consultation with the parents) must provide the student with a FAPE, including services comparable to those described in the student's IEP from the previous public agency, until the new public agency: (1) conducts an evaluation, if determined necessary by the new public agency; and (2) adopts the IEP from the previous public agency or develops and implements a new IEP (34 CFR §300.323). "Comparable services" is defined as services that are similar or equivalent to those that are described in the IEP from the previous public agency, as determined by the IEP team in the new public agency [emphasis added] (Analysis of Comments and Changes to the IDEA, *Federal Register*, Vol. 71, No. 156, p. 46681, August 14, 2006).

A student who is Court-ordered to be placed in a secure correctional facility may be prohibited from receiving special education instruction in the manner and the educational placement required by an IEP that was developed when the student resided in the community. In such a case, the PGCPS must, in consultation with the student's parent, or the student, if parental rights have been transferred to the student,<sup>3</sup> ensure the provision of a FAPE to the student until the IEP team determines comparable services at the facility or reviews and revises the IEP (*Dear Colleague Letter*, United States Department of Education, Office of Special Education and Rehabilitation Services, December 5, 2014).

Changes to the IEP may be made either through the IEP team process or by amending the IEP with the agreement of the parent<sup>4</sup> (34 CFR §300.324). However, the special education services that are provided are to be based on the decisions made about the student's individual needs and not solely on factors such as the configuration of the service delivery system, availability of staff, or administrative convenience (34 CFR §§300.101, .103, .116, .320, .323, COMAR 13A.05.01.10, and *Letter to Clay*, United States Department of Education, Office of Special Education Programs, 23 IDELR 341, May 17, 1995).

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<sup>3</sup> Parental rights under the IDEA include the right to consent to the initiation of special education and related services and the right to revoke that consent (34 CFR §300.9). A State may provide that, when a student reaches the age of majority under State law, all of the parental rights under the IDEA transfer to the student (34 CFR §300.520). In Maryland, parental rights may be transferred to a student who turns eighteen (18) years old only under very specific and limited circumstances (Md. Ann. Ed. Art. §8-412.1).

<sup>4</sup>When convening an IEP team, the public agency must ensure that the student's parent is provided with the opportunity to participate in the meeting. If a parent cannot attend an IEP team meeting, the public agency must use other methods to ensure parent participation, including individual or conference telephone calls. A meeting may be conducted without a parent in attendance only if the public agency is unable to convince the parents to attend. In this case, the public agency must keep a record of its attempts to arrange a mutually agreed on time and place, such as detailed records of telephone calls made or attempted and the results of those calls, copies of correspondence sent to the parents and any responses received, and detailed records of visits made to the parent's home or placement of employment and the results of those visits (34 CFR §300.322).

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When reviewing and revising the IEP, the IEP team should consider whether there has been an interruption in the provision of special education during the student's transfer to the correctional facility, and how the break in services has affected the type or amount of special education services needed to provide the student with a FAPE (*Dear Colleague Letter*, United States Department of Education, Office of Special Education and Rehabilitation Services, December 5, 2014).

### **Records Maintenance**

In order to ensure that transferring students are provided with the special education and related services needed to make progress on the IEP goals and progress through the general curriculum, the public agency must take reasonable steps to promptly obtain the student's educational record, including the IEP and supporting documents (34 CFR §300.323). Student records provide information about a student's academic performance, including the courses needed for graduation. Therefore, the proper maintenance of these records is necessary to ensure that accurate information is available to plan for a student's education.

All student educational records are to be maintained in accordance with the Family Educational Rights and Privacy Act (FERPA) (34 CFR §§300.610 - .627). In order to ensure proper student records management, the local public agencies in the State are required to maintain educational records consistent with the Maryland Student Records System Manual (COMAR 13A.08.02.01 and .02).

The Maryland Student Records System Manual requires that each public agency develop and implement procedures to ensure that the required data are collected and records maintained accurately (*Maryland Student Records System Manual*, 2011, 2016). The PGCPS Administrative Procedure No 5111 (January 1, 2010) requires that when a student transfers into the school system, a request for records card be completed to request the student's records from the previous school attended.

### **DISCUSSION/CONCLUSIONS:**

In this case, the complainant alleges that the PGCPS does not take steps to locate and offer a FAPE to students with disabilities at the XXXXXXXXXXXXXXXXXXXX other than those who have received special education services from a Maryland jurisdiction participating in the Maryland On-line IEP system (Doc. e).

Based on the Findings of Facts #1, #2, and #4, the MSDE finds that the PGCPS does take steps to locate students with disabilities and has provided education services to students from other States and the District of Columbia.

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However, based on the Findings of Facts #3, the MSDE finds that the PGCPS does not take sufficient steps to locate students with disabilities other than those who have received special education services from a Maryland jurisdiction participating in the Maryland on-line IEP system. As a result, based on the Findings of Facts #11 - #14, the MSDE finds that the PGCPS did not ensure that the student was located and offered a FAPE upon his entry into the facility.

In addition, based on the Finding of Fact #5, the MSDE finds that the PGCPS does not ensure that the requirements are met before transferring parental rights to students with disabilities. Therefore, the school system does not ensure that a FAPE is offered to all students with disabilities at the facility. Therefore, the MSDE finds that violations have occurred with respect to this aspect of the allegation.

In this case, the complainant further alleges that the PGCPS does not ensure that comparable services are provided to students with an IEP once they are identified (Doc. e).

Based on the Findings of Facts #6 - #10 and #12 - #25, the MSDE finds that violations have occurred with respect to this aspect of the allegation for the following reasons:

1. Reasonable steps were not taken to promptly obtain the student's educational record from the District of Columbia, consistent with the legal requirements and the school system's procedures;
2. The student's IEP was amended without agreement of the student's parent and without convening an IEP team;
3. Amendments made to the student's IEP were not based on the student's needs;
4. The student was not provided with the special education and related services required by either the DC IEP or the IEP as amended by the PGCPS; and
5. The student was not provided with the opportunity to earn credit in courses or receive a sufficient amount of instruction to enable him to earn a Maryland High School Diploma or the opportunity to participate in a course to prepare him to obtain a Maryland High School Diploma by Examination.

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

##### **Student-Specific**

The PGCPS is required to provide the MSDE with documentation by November 1, 2015 of the provision of compensatory services or other agreed upon remedy for the student's loss of a FAPE from May 24, 2014 to April 10, 2015.

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### **Systemic**

The PGCPS is required to provide the MSDE with documentation by February 1, 2016 that sufficient steps have been taken to ensure that the violations identified through this investigation do not recur.

### **Similarly-Situated Students**

The MSDE requires the PGCPS to provide documentation by February 1, 2016 that it has identified each similarly-situated student placed at the XXXXXXXXXXXXXXXXXXXXXXXX from May 24, 2014 until the systemic corrective action above has been completed. For each student identified, the PGCPS must provide documentation of sufficient efforts to locate the student and has offered to provide compensatory services or other agreed upon remedy for the loss of a FAPE for each student who is located.

### **TECHNICAL ASSISTANCE:**

Technical assistance is available to the parties from Dr. Kathy Aux, Compliance Specialist, MSDE at (410) 767-7770.

Please be advised that the complainant and the PGCPS 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 request for reconsideration, the public agencies must implement any Corrective Action consistent with the timeline requirements as reported in this Letter of Findings.

Questions regarding the findings and conclusions contained in this letter should be addressed to this office in writing. The students' parents 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

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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/am

c: Kevin W. Maxwell  
Shawn Joseph  
LaRhonda Owens  
Kerry Morrison  
Dori Wilson  
Anita Mandis  
Kathy Aux