



April 15, 2016

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RE: XXXXX
Reference: #16-076

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 February 22, 2016 the MSDE received a complaint from Mr. XXXXXXXXXXXXX and Mrs. XXXXXXXXXXXX, hereafter, “the complainants,” on behalf of the above-referenced student. In that correspondence, the complainants alleged that the Calvert County Public Schools (CCPS) violated certain provisions of the Individuals with Disabilities Education Act (IDEA) with respect to the student.

The MSDE investigated the following allegations:

1. The CCPS did not ensure that proper procedures were followed to provide the student with a Free Appropriate Public Education (FAPE) since his transfer to the CCPS in July 2015, in accordance with 34 CFR §§300.101, .103, and .323. Specifically, the complainants alleged the following:
 - a. The CCPS did not take reasonable steps to promptly obtain the student’s complete educational records from the previous public agency in which he was enrolled;
 - b. The CCPS did not provide the student with the speech and language therapy services in the settings required by the Individualized Education Program (IEP), and specialized instruction to address the speech and language IEP goals; and

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- c. The CCPS did not provide the student with the accommodations and supplementary aids required by the IEP.
2. The CCPS did not follow proper procedures when conducting an initial evaluation of the student, in accordance with 34 CFR §§300.301, and .304 - .311. Specifically, the complainants alleged the following:
 - a. The CCPS did not ensure that the evaluation was completed within the required timelines;
 - b. The CCPS did not ensure that the evaluation included consideration of a SLD in math; and
 - c. The CCPS did not ensure that all existing evaluation data on the student was considered.

INVESTIGATIVE PROCEDURES:

1. On February 23, 2016, the MSDE provided a copy of the State complaint, by facsimile, to Ms. Christina Harris, Director of Special Education, CCPS.
2. On March 7, 2016, Ms. K. Sabrina Austin, Education Program Specialist, MSDE, conducted a telephone interview with Mr. XXXXXXXXXX, the student's step-father, to clarify the allegations to be investigated. On the same date, the MSDE received additional documentation from the student's step-father for consideration.
3. On March 9, 2016, the MSDE sent correspondence to the complainants that identified the allegations subject to this investigation. On the same date, the MSDE notified the CCPS of the allegations and requested that the CCPS review the alleged violations. Also on March 9, 2016, Ms. Austin and Ms. Sharon Floyd, Education Program Specialist, MSDE, spoke with the student's step-father by telephone to confirm the documentation submitted with the State complaint.
4. On March 11 and 23, 2016, the MSDE requested documentation from the CCPS.
5. On March 7, 10 and 24, 2016, the student's step-father provided additional documentation to the MSDE.
6. On March 22 - 24, and 30, 2016, the CCPS provided documentation to the MSDE for consideration. On March 30, 2016, the CCPS also provided a written response to the allegations, addressed to the MSDE.

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7. On March 30, 2016, Ms. Austin and Ms. Floyd conducted a site visit at the CCPS central office, and interviewed the following school staff:

- a. XXXXX, Speech and Language Pathologist, XXXXXXXXXXXXXXXXX;
- b. XXXXXXXX, IEP Facilitator, XXXXXXXXXXXXXXXXX; and
- c. XXXXXXXX, IEP Chairperson and Vice Principal, XXXXXXXXXXXXXXXX.

Ms. Harris and Ms. Nancy Gregory, Supervisor of Special Education, CCPS, participated in the site visit as representatives of the CCPS and to provide information on the school system's policies and procedures, as needed.

8. The MSDE reviewed documentation, relevant to the findings and conclusions referenced in this Letter of Findings, which includes:

- a. Receipt of parental rights document, dated September 29, 2015;
- b. The CCPS Guidance Document for Students with Out-of-State IEPs, dated September 2013;
- c. The student's registration form, signed on June 28, 2015;
- d. Correspondence from the CCPS to the MSDE responding to the allegations, dated March 30, 2016;
- e. The CCPS form for parental permission to release information, signed by the student's mother on July 7, 2015;
- f. The school staff's 2015 - 2016 entry log of record requests and receipts;
- g. XXXXXXXXXXXXXXXXX log entry indicating that the student's records were sent to XXXXXXXXXXXXXXXX on August 24, 2015;
- h. The CCPS 2015 – 2016 school year calendar;
- i. The school staff's notes, dated August 28, 2015;
- j. The electronic mail communications (emails) among the school system staff, dated September 2015 to March 2016, and emails between the complainants and the school system staff, dated September 2015 to March 2016;
- k. The student's IEPs developed by XXXXXX, dated March 4, 2015, and March 20, 2013;
- l. Prior Written Notice, dated September 29, 2015;
- m. Correspondence from the school system staff to the complainants, dated January 12, 2016, and February 23, 2016;
- n. The related service logs of the speech therapists, September 2015 to December 2015;
- o. The CCPS assignment of speech and language pathologists, by school, for the 2015- 2016 school year;

- p. The report of the student's progress towards mastery of the annual IEP goals, dated October 28, 2015;
- q. The Prior Written Notice, dated November 24, 2015;
- r. The Prior Written Notice, dated December 15, 2015;
- s. The report of a psychological assessment by the CCPS, dated November 10, 2015, and report addendum to the psychological by the CCPS, dated December 8, 2015;
- t. The report of an educational assessment by the CCPS, dated October 5, 2015 - November 3, 2015;
- u. The report of speech/language assessments by the CCPS, dated November 11, 2015;
- v. The report of a classroom observation by the CCPS, dated October 7, 2015;
- w. Notice and consent for assessment, signed and dated by the student's mother on September 29, 2015;
- x. The report of evaluation and determination of initial eligibility by the CCPS, dated December 15, 2015;
- y. The reports of eligibility determination for specific learning disability, dated December 15, 2015, and other health impairment, and speech/language impairment, dated September 24, 2015;
- z. The student's 504 Plan, dated January 8, 2016;
- aa. Correspondence from the complainants alleging violations of the IDEA, received by the MSDE on February 22, 2016; and
- bb. The IEP team report of Specific Learning Disability, the IEP team report of Other Health Impairment, and the IEP team report of Speech and Language Impairment.

BACKGROUND:

The student is ten (10) years old and attends XXXXXXXXXXXXXXXX. At the start of the 2015 - 2016 school year, he was identified as a student with a Speech and Language Impairment under the IDEA, and had an IEP requiring specialized instruction and related services. On December 15, 2015, the IEP team determined that the student no longer meets the criteria for identification as a student with a disability under the IDEA. The student now has a Section 504 Accommodation Plan that requires educational supports and accommodations (Docs. k, r, z and aa).

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

**ALLEGATION #1: PROCEDURES FOLLOWING THE STUDENT'S
TRANSFER TO THE CCPS: STEPS TO OBTAIN THE
RECORDS, AND IMPLEMENTATION OF THE
STUDENT'S XXXXXXXX IEP**

FINDINGS OF FACTS:

1. The student began attending XXXXXXXXXXXXXXXX at the start of the 2015 -2016 school year, following his family's relocation from XXXXXX to Maryland (Doc. aa and interview with the student's step-father).
2. There is documentation that XXXXXX developed an IEP for the student, dated March 4, 2015, identifying him as a student with a disability under the IDEA based on a Speech and Language Impairment (Doc. k).
3. On June 28, 2015, the student's mother completed the student registration form developed by the CCPS. The student's mother checked the box on the form indicating that the student has an IEP, and provided the name, address, and phone number of the student's previous school in XXXXXX (Doc. c).
4. On July 7, 2015, the student's mother completed the form developed by the CCPS to request and authorize the release of the student's record from his previous school in XXXXXX (Doc. e).
5. On August 17, 2015, the school staff mailed the CCPS form requesting the student's educational record from his previous school in XXXXXX. There is no documentation of other efforts by the school staff to obtain the student's record from his previous school in XXXXXX. The school system staff report that the student's school has only one secretary "on duty" during the summer, and the secretary is responsible for processing requests for student records (Docs. d and e, and interview with the school system staff).
6. There is documentation that, on August 24, 2015, the student's previous school in XXXXXX sent the cumulative section of the student's record to XXXXXXXXXXXX XXXXXX (Doc. g).
7. August 25, 2015 was the first day of school for students for the 2015 – 2016 school year (Doc. h).
8. On August 28, 2015, the school staff called the student's mother to request a copy of the IEP from XXXXXX (XX IEP) because they were "still waiting" for the student's educational records from his previous school in XXXXXX (Doc. i).

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9. By September 1, 2015, the school staff had obtained the student's XX IEP from the student's mother (Doc. j and interview with the school staff).
10. On September 8, 2015, the school staff documented the receipt of the student's "record" from his previous school in XXXXXX. While there is no documentation identifying the specific documents that the school staff received, the school staff report that the student's complete educational record was not received at this time (Doc. f and interview with the school staff).
11. The XX IEP included three (3) speech and language goals. The XX IEP also reflected that the student required several supplementary aids and supports, including, but not limited to, small group instruction, individualized pacing, a visual timer, instruction using a multi-sensory approach, picture word cards, graphic organizers, activities using language "apps," testing over more than a day, supervised breaks, tests read aloud, home school communication by special education staff, preferential seating, and modified assignments (Doc. k).
12. The XX IEP also required that the student receive three (3) - thirty (30) minute sessions of speech and language services per week, and stated that the services were to be provided in a "separate classroom." The XX IEP also clarified, in two (2) separate places within the document, that the student was to receive two (2) speech and language sessions outside of the classroom "in the speech room," and one (1) session inside the classroom for "collaboration" (Doc. k).
13. On September 29, 2015, the IEP team documented its review of the XX IEP. There is no documentation that the IEP team determined comparable services (Doc. l).
14. In December 2015, the student's step-father expressed concern that the student's speech and language sessions were not being provided in accordance with the XX IEP (Doc. m).
15. There is documentation that the student's speech services were provided by two (2) related service providers who, together, were assigned to provide services to the student's school four (4) days a week (Docs. n and o).
16. The related service logs of the speech therapists reflect that the student participated in speech therapy sessions, in a group setting, from September 2015 until December 2015. While the logs do not indicate the location of the sessions, the school system staff report that all but one (1) session of speech and language therapy services were provided outside of the classroom (Doc. n and interview with the school system staff).

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17. The parties agree that the student's XX IEP was not implemented as written, with respect to the location in which the student was provided speech and language services. Specifically, the CCPS acknowledged, through correspondence to the complainants dated February 23, 2016, that the student was not provided with the speech and language services required by the XXIEP because he "received all three [3] of his weekly speech-language sessions in the pull-out setting, when one [1] was to be provided in the general education setting." In that correspondence, the CCPS noted it's "mistake" due to an "oversight" in the service location. The CCPS has agreed to provide the student with four (4) hours of tutoring in order to address the classroom instruction that he missed during the times when he was mistakenly removed from the classroom for speech services (Doc. m and interviews with the parties).
18. The student's progress report, dated October 28, 2015, reflects that he mastered the objectives identified within the annual goals in the XX IEP. A review of the related service logs of the speech therapists reflects that the student received instruction related to the annual goals in the XX IEP during his therapy sessions (Docs. n and p).
19. There is no documentation that the student was provided with the supplementary services required by the XX IEP (Interview with the school system staff).

DISCUSSION/CONCLUSIONS:

If a student with an IEP in one state transfers to a public agency in another state, the new public agency, in consultation with the student's parent, must provide the student with a Free Appropriate Public Education (FAPE), including services comparable to those described in the student's IEP from the previous state, until the new public agency either conducts an evaluation, if determined to be necessary, and either, adopts the IEP from the previous public agency or develops 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 IDEA, Federal Register, Vol. 71, No. 156, p. 46681, August 14, 2006).

In order to ensure the provision of appropriate services to a transferring student, the new public agency must take reasonable steps to promptly obtain the student's educational record, including the IEP and supporting documents and any other records relating to the provision of special education or related services to the student, from the previous public agency in which the student was enrolled (34 CFR §300.323).

In this case, the complainants allege that the school staff did not take steps to timely obtain the student's record from his previous school following his transfer to XXXXXXXXXXXXXXXXXXXX (Doc. aa).

Based on the Findings of Facts #1 - #10, the MSDE finds that the CCPS did not take reasonable steps to obtain the student's complete record from his previous school in XXXXXX in a timely manner. Therefore, the MSDE finds that a violation occurred with regard to this aspect of the allegation.

The complainants also allege that the CCPS did not implement the student's XX IEP as written, and that the IEP team did not determine that the manner in which services were provided by the CCPS was comparable to that of the services in the XX IEP (Doc. aa).

Based on the Findings of Facts #2, #11 - #19, the MSDE finds that the school staff did not implement the XX IEP, as written, have an IEP team or determine that the manner in which services were provided were comparable to those in the XX IEP. Therefore, the MSDE finds that a violation occurred with respect to this aspect of the violation. However, based on the Finding of Fact #17, the MSDE does not require corrective action because the CCPS has already taken steps to remediate the violation.

ALLEGATION #2: INITIAL EVALUATION

FINDINGS OF FACTS:

20. The CCPS has established guidelines that address "students with out-of-state IEPs." These procedures reflect the following requirements:
 - a. Each student who enrolls in the CCPS with a current IEP from another state must be evaluated to determine eligibility under the IDEA;
 - b. The CCPS, 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 CCPS conducts an initial evaluation, and develops, adopts and implements a new IEP, if appropriate; and
 - c. The IEP will be considered an initial IEP if the student is ultimately determined eligible (Doc. b).
21. On September 29, 2015, an IEP team began an evaluation to determine the student's eligibility for special education and related services (Doc. l).

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22. The IEP team considered information that the student was previously identified, while attending school in XXXXXX, as a student with a Speech and Language Disability, and that he is being treated pharmacologically for Attention Deficit with Hyperactivity Disorder (ADHD). The student's attendance, state testing, and educational history were also considered (Doc. l).
23. The IEP team also considered teachers' reports that the student "is on grade level in all subject areas," but that weaknesses were noted in the application of skills, organization, task initiation, social interaction with peers, and focus and attention to details. They also considered the complainants' concerns about the student's distractibility and disorganization. The IEP team determined that assessments were needed to address the concerns for the student's attention and difficulties when following directions, expressive language challenges, executive functioning skills levels, and according to the math teacher, areas where the student's "knowledge of concepts appeared to be missing." The student's mother provided written consent for assessments on September 29, 2015 (Docs. l and w).
24. The IEP team did not consider information about the student from previous years' report cards or assessment data from XXXXX because, as noted in the Finding of Fact #10, the school staff did not receive the student's complete education record from his previous school in XXXXXXXX (Docs. e, f, l, s and w, and interview with the school staff).
25. On November 24, 2015 the IEP team considered the results of the assessments that were recommended on September 29, 2015, which included the following:
 - a. A report of a CCPS speech/language assessment completed on November 11, 2015, states that the student is within the "average" range and is able to demonstrate a variety of receptive and expressive skills. The report also states that the student "does not exhibit impairments in vocabulary, phonology, expressive and receptive language indicative of a communication disorder." The report further states that the student demonstrates "relative receptive language weaknesses" and may "need repetition and cues, and increased processing time" and rephrasing of directions within the classroom. The report also states that any language difficulties are not primarily the result of visual or auditory deficits, dialectical differences or from learning more than one language;
 - b. A report of a CCPS psychological assessment completed on November 10, 2015, states that the student "is expected to access the general education curriculum based on his intellectual skills which ranged from low average to average." It further states that the student "struggles in the areas of starting and completing

- projects, planning, organizational and prioritizing skills,” but that he is able to retain information at a rate that is similar to his same aged peers;
- c. A report of a CCPS educational assessment completed on November 3, 2015, states that “the student’s academic achievement ranged from average to very superior in reading, math and written language.” The educational assessment report includes information that the student performed within the “average range in all of the math areas assessed;”
 - d. A report of a CCPS classroom observation of the student in the math classroom on October 7, 2015, which indicates that the student was observed having some problems “following directions, understanding math concepts, needing redirections”, but he was able to demonstrate “good work habits” and “appropriate attention to the task;”
 - e. The concerns expressed by the complainants that previous assessment information needed to be included in the discussion of existing information to determine whether a “pattern of performance” exists in the student’s educational history;
 - f. The concerns expressed by the complainants that the student’s performance and ability to complete school-based assignments in the school and home, and his ability to complete routine tasks at home, reflect that he is highly distracted and requires continual repetition of directions in order to complete such activities;
 - g. A report from the student’s private physician, which includes a diagnosis of ADHD;
 - h. The reports from classroom teachers indicating that the student has difficulty keeping track of his belongings, managing multiple tasks at once, organizing his thoughts well, managing time effectively, and working neatly; and
 - i. The complainants’ concerns that the student may have a Specific Learning Disability in the area of math (Docs. s - v, and x).
26. At the November 24, 2015 IEP team meeting, the IEP team had information that the student’s previous school in XXXXXX had conducted a Speech and Language Assessment and an Educational Assessment of the student in 2013. However, the school system staff acknowledge that they did not have the reports of the XXXXXX Speech and Language and Educational Assessments to consider (Docs. k, t and u, and interview with the school system staff).

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27. At the November 24, 2015 IEP team meeting, the IEP team determined, based on the data, that the student does not meet the eligibility criteria for identification as a student with a Speech and Language Impairment or an Other Health Impairment related to ADHD under the IDEA (Docs. s, q and bb).
28. The documentation of the November 24, 2015 IEP team meeting indicates that extensive discussion occurred regarding “specialized instruction versus the implementation of instructional supports and accommodations.” The complainants requested a continuance of the meeting to further the discussion about whether the student was eligible under the IDEA (Doc. q).
29. On December 15, 2015, the IEP team reconvened and confirmed the determination that the student does not meet the eligibility criteria for special education on the basis of a Speech and Language Impairment or an Other Health Impairment. At that time, the complainants proposed that the IEP team consider the student’s eligibility as a student with a Specific Learning Disability (SLD) in the area of math. The IEP team determined that it had sufficient information to consider the complainants’ request (Docs. r and bb).
30. At the December 15, 2015 IEP team meeting, the IEP team considered the following information to determine whether the student has a SLD in math: input from the complainants, the results of cognitive and math assessments, a math classroom observation, teacher reports, and information that the student was receiving extra support from a “math fluency” group. Based on this information, the IEP team determined that the student does not meet the criteria for identification as a student with a SLD in math under the IDEA (Doc. r).
31. The complainants disagreed with the IEP team decision but indicated that the basis of the disagreement was their belief that the student requires specialized instruction to address his ADHD. The IEP team discussed that supports to address the student’s needs, as expressed by the complainants, in the areas of homework and organization could be provided through the development of a Section 504 Accommodation Plan (504 Plan) if he is identified as a student with a disability under Section 504 of the Rehabilitation Act of 1973 based on his ADHD diagnosis (Doc. r).
32. On January 8, 2016, the Student Support Team (SST) met and found the student eligible for a 504 Plan to address his academic and organizational needs related to ADHD (Doc. z).

DISCUSSION/CONCLUSIONS:

The public agency must complete an initial evaluation of a student within sixty (60) days of parental consent for assessments and ninety (90) days of the public agency receiving a written referral (34 CFR § 300.301 and COMAR 13A.05.01.06(A)).

The public agency must ensure that a student is assessed in all areas related to the suspected disability, including, if appropriate, health, vision, hearing, social and emotional status, general intelligence, academic performance, communicative status, and motor abilities (34 CFR § 300.304).

The public agency must use a variety of assessment tools and strategies to gather relevant functional, developmental, and academic information about the student, including information provided by the parent that may assist in determining whether the student is a student with a disability (34 CFR § 300.304). When conducting an evaluation, the team must review existing evaluation data and on the basis of that review and input from the student's parents, identify what additional data, if any, is needed to determine whether the student is a student with a disability and the educational needs arising from that disability. The information that the IEP team considers must include information related to enabling the student to be involved in and progress in the general education curriculum (34 CFR §300.305).

Based on the Findings of Facts #4, #21, #23, #25 and #27, the MSDE finds that the CCPS did not ensure that the evaluation was conducted within the required timelines because it was not completed within ninety (90) days of the date that the CCPS was aware that an evaluation was needed in accordance with its procedures that require evaluation of all students with disabilities transferring from another state. Therefore, the MSDE finds a violation with this aspect of the allegation.

Based on the Findings of Facts #25, #29 and #30, the MSDE finds that there is documentation that the CCPS had sufficient data to make the eligibility determination for a SLD in math, including an observation of the student in the math classroom, and that the IEP team's decision was consistent with the data. Therefore, the MSDE does not find a violation in this aspect of the allegation.

However, based on the Findings of Facts #4, #5, #6, #9, #21 - #24, and #26, the MSDE finds that the CCPS did not take appropriate steps to obtain and consider all of the existing data when it made the eligibility determination regarding a Speech and Language Impairment and Other Health Impairment under the IDEA. Therefore, the MSDE finds a violation occurred.

CORRECTIVE ACTIONS/TIMELINES:

Student-Specific

The MSDE requires the CCPS to provide documentation, by June 1, 2016, that the following actions have taken place:

1. Sufficient efforts have been made to obtain the student's complete educational records from his previous school in XXXXXX, including assessment data; and
2. The IEP team has convened to consider the XXXXXX Speech and Language Assessment,¹ and any other assessment data, and determined, based on a review of such assessment data, whether the student meets the criteria for identification as a student with a disability under the IDEA. If the IEP team determines that the student meets the criteria for identification as a student with a disability, the IEP team must develop an IEP, and determine the amount and nature of compensatory services or other remedy to redress the violation, and developed a plan for the provision of those services with one (1) year of the date of this Letter of Findings.

School-Based

The MSDE requires the CCPS to provide documentation, by June 1, 2016, of the steps it has taken to ensure that XXXXXXXXXXXXXXXX staff properly implements the requirements for the evaluation of students who transfer to a CCPS school with an IEP developed by another State. Specifically, the evaluation timeline begins on such date when the CCPS first becomes aware that an evaluation is needed.

Systemic

The MSDE requires that the CCPS provide documentation by August 1, 2016, that they have reviewed the steps it has taken, including appropriate staff training, to ensure compliance by all CCPS schools with the IDEA and related State requirements that students who transfer to a CCPS school with an IEP developed by another State must be provided with a FAPE, and specifically, that the CCPS must implement the out of state IEP as written until the IEP team determines comparable services, or at such time as the public agency conducts an evaluation, if necessary, and develops, adopts, and implements a new IEP, if appropriate, in accordance with 34 CFR §§300.323.

¹ The MSDE obtained the XXXXXX Speech and Language Assessment from the complainants and provided it to the CCPS on March 30, 2016, during the site visit for this investigation.

TECHNICAL ASSISTANCE:

Technical assistance is available to the parties by contacting Dr. Nancy Birenbaum, Compliance Specialist, Family Support and Dispute Resolution Branch, MSDE at (410) 767-7770.

Please be advised that both the complainants and the CCPS 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 school system must implement any corrective actions consistent with the timeline requirement 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 parents and the CCPS 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

c: Daniel D. Curry
Christina Harris
Nancy Gregory
XXXXXXXXX
Anita Mandis
K. Sabrina Austin
Sharon Floyd