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April 3, 2013

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Ms. Mary Tillar  
Director of Special Education  
Anne Arundel County Public Schools  
2644 Riva Road  
Annapolis, Maryland 21401

RE: XXXXX  
Reference: #13-048

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 5, 2013, the MSDE received a complaint from XXXXXXXXXXXXXXXX, hereafter, “the complainant,” on behalf of her son. In that correspondence, the complainant alleged that the Anne Arundel County Public Schools (AACPS) violated certain provisions of the Individuals with Disabilities Education Act (IDEA) with respect to the above-referenced student. The MSDE investigated the following allegations:

1. The AACPS has not followed proper procedures when disciplinarily removing the student from school since the start of the 2012-2013 school year, in accordance with 34 CFR §§300.530-.536;
2. The AACPS has not ensured that the student’s Individualized Education Program (IEP) addresses his social/emotional/behavioral needs since the start of the 2012-2013 school year in accordance with 34 CFR §300.324; and
3. The AACPS has not ensured that the student has been provided with a “time-out pass”<sup>1</sup> required by the IEP since October 1, 2012, in accordance with 34 CFR §300.101.

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<sup>1</sup> This was originally identified as a “crisis pass.” However, during the course of the investigation, it was determined that the behavioral support is called a “time-out pass” (Docs. c, d, f, l, m, s, and u).

**INVESTIGATIVE PROCEDURES:**

1. Ms. Kathy Stump, Education Program Specialist, MSDE, was assigned to investigate the complaint.
2. On December 17, 2012, the MSDE received written correspondence from the complainant containing allegations of violations of the IDEA.
3. On December 20, 2012, Ms. Stump contacted the complainant by telephone to inform her of the requirement that a State complaint include a proposed remedy that the local school system can provide in order for this office to initiate a State complaint investigation.
4. On December 21, 2012, the MSDE sent written correspondence to the complainant reiterating the requirement that the State complaint include a proposed remedy.
5. On February 5, 2013, the complainant provided the MSDE with written correspondence that included a proposed remedy, which was required to initiate a State complaint investigation.
6. On February 7, 2013, the MSDE sent a copy of the complaint, via facsimile, to Ms. Mary Tillar, Director of Special Education, AACPS; and Ms. Alison Steinfeld, Program Manager, Compliance and Legal Issues, AACPS.
7. On that same date, Ms. Stump conducted a telephone interview with the complainant to clarify the allegations to be investigated.
8. On February 11, 2013, the MSDE sent correspondence to the complainant that acknowledged receipt of the complaint and identified the allegations subject to this investigation. On the same date, the MSDE notified Ms. Tillar of the allegations and requested that her office review the alleged violations.
9. On February 11, 14, 15, and 16, 2013, the complainant provided the MSDE with information and documentation to be considered during the course of the investigation, via electronic mail (e-mail).
10. On February 15 and 18, 2013, the complainant provided the MSDE with documentation to be considered during the course of the investigation, via facsimile.
11. On February 25, 2013, the AACPS provided the MSDE with a written response to the complaint and documentation from the student's educational record, via e-mail.
12. On February 28, 2013, Ms. Stump conducted a telephone interview with the complainant.
13. On March 4, 5, 6, 7, 15, 22, and 26, 2013, the complainant provided additional information and to be considered during the course of the investigation, via e-mail.

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14. On March 5, 2013, the MSDE requested additional information and documentation from the AACPS, via e-mail.
15. On March 5, 18, 19, 22, and 27, 2013, the complainant provided the MSDE with additional documentation to be considered during the course of the investigation, via e-mail.
16. On March 5, 15, 25 and 26, 2013, the AACPS provided the MSDE with additional information and documentation from the student's educational record, via e-mail.
17. On March 15 and 22, 2013, Ms. Stump conducted telephone interviews with the complainant.
18. On March 18, 2013, Ms. Stump conducted a telephone interview with Ms. Sally Stanfield, the complainant's attorney, at the complainant's request.
19. On April 1, 2013, the complainant provided the MSDE with additional documentation to be considered during the course of the investigation, via e-mail.
20. On April 2, 2013, the AACPS provided the MSDE with additional documentation to be considered during the course of the investigation, via e-mail.
21. The MSDE reviewed documentation, relevant to the findings and conclusions referenced in this Letter of Findings, which includes:
  - a. Correspondence from the complainant to the MSDE, received on December 17, 2012 and February 5, 2013;
  - b. Functional Behavior Assessment, dated December 10, 2009;
  - c. Behavioral Intervention Plan, dated December 17, 2009;
  - d. IEP, dated October 6, 2011;
  - e. Reevaluation referral, dated October 1, 2012;
  - f. IEP, dated October 1, 2012;
  - g. Functional Behavior Assessment, dated November 12, 2012;
  - h. Educational Assessment report, dated November 12, 2012;
  - i. Psychological Assessment report, dated November 19, 2012;
  - j. Comprehensive Evaluation Report, dated November 19, 2012;
  - k. IEP team meeting notice and report, dated November 19, 2012;
  - l. Behavioral Intervention Plan, dated November 19, 2012;
  - m. Behavioral Intervention Plan, dated December 10, 2012;
  - n. IEP team meeting notice and report, dated December 10, 2012;
  - o. IEP team meeting notice and report, dated December 17, 2012;
  - p. IEP team meeting notice and report, dated January 11, 2013;
  - q. IEP team meeting notice and report, dated January 31, 2013;
  - r. IEP team meeting notice and report, dated February 15, 2013;
  - s. IEP, dated February 15, 2013;
  - t. IEP and team meeting report, dated March 14, 2013;

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- u. IEP, dated March 14, 2013;
- v. Correspondence from the AACPS personnel to the complainant, dated March 19, 2013;
- w. E-mail from the complainant to the MSDE, dated April 1, 2013;
- x. IEP progress reports for the 2012-2013 school year;
- y. Student's attendance data for the 2012-2013 school year;
- z. Student's discipline record for the 2012-2013 school year;
- aa. Sample of a Self-Regulation Matrix form, undated;
- bb. Sample of Choice Cards, undated; and
- cc. Sample of a Situation Processing Sheet, undated.

### **BACKGROUND:**

The student is fourteen (14) years old and is identified as a student with Autism under the IDEA. From the start of the 2012-2013 school year until March 11, 2013, the student attended XXXXXXXXXXXXXXXX (XXXXXXXX), where he received special education and related services. Since March 18, 2013, the student has been unable to attend school due to an emotional condition and Home and Hospital Teaching (HHT) services are required.

During the period of time addressed by this investigation, the complainant participated in the education decision-making process and was provided with written notice of the procedural safeguards (Docs. a, d, f, s, and u).

### **ALLEGATION #1:                    DISCIPLINARY REMOVALS DURING THE 2012-2013 SCHOOL YEAR**

#### **Findings of Facts:**

1. The student's educational record, discipline record, and attendance data indicate that he has been disciplinarily removed from school for ten (10) school days during the 2012-2013 school year as follows:
  - a. One (1) school day for "improper physical contact" with a teacher on November 1, 2012;
  - b. Three (3) school days for "improper physical contact" with a teacher on December 12, 2012;
  - c. Three (3) school days for a "physical attack" on a teacher on February 4, 2103; and
  - d. Three (3) school days for a "physical attack" on a teacher on February 28, 2013 (Docs. y and z).
2. On December 17, 2012, the IEP team convened to discuss a disciplinary infraction that occurred on December 12, 2012, which resulted in three (3) days of disciplinary removal,

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as indicated above. At the meeting, the team determined that, the student's behavior was a manifestation of his disability because the team was in the process of reviewing and revising the student's Behavioral Intervention Plan (BIP) when the behavior occurred (Doc. o).

3. The documentation of the meeting indicates that the team also determined that the disciplinary removal would be "expunged" (Doc. o).

### **Discussion/Conclusions:**

The IDEA and the COMAR provide protections to students with disabilities who are removed from school in excess of ten (10) school days in a school year. A student with a disability may be removed from the student's current placement for up to ten (10) consecutive school days for each incident of misconduct in a school year if the cumulative effect of the removals does not constitute a change in placement (34 CFR §300.530). A change in placement occurs if the removal is for more than ten (10) consecutive school days or the student has been subjected to a series of removals that constitute a pattern because they total more than ten (10) school days in a school year and the student's behavior is substantially similar to the behavior in previous incidents that resulted in the removals (34 CFR §§300.530 and .536).

In order to ensure that students are provided with services in accordance with the requirements of the IDEA, such as the disciplinary procedural protections, each public agency must accurately record information, including student attendance and disciplinary removals, as specified in the Maryland Student Records System Manual (COMAR 13A.08.02.04).

Based on the Finding of Fact #1, the MSDE finds that the student has not been disciplinarily removed from school for more than ten (10) school days. Therefore, the IDEA protections do not apply. However, based on the Findings of Facts #2 - #3, the MSDE finds that the AACPS has not ensured that the student's discipline record is accurate because it reflects a suspension that was "expunged." Therefore, the MSDE finds that a violation has occurred.

### **ALLEGATION #2:**                    **IEP THAT ADDRESSES THE STUDENT'S SOCIAL, EMOTIONAL, AND BEHAVIORAL NEEDS**

#### **Findings of Facts:**

#### **IEP in effect at the start of the 2012-2013 school year**

4. The IEP in effect at the start of the 2012-2013 school year includes statements of the student's present levels of academic achievement and functional performance related to the student's social, emotional, and behavioral functioning and in "requisite learning." The present levels of performance are based on teacher and service provider reports, informal observations, behavior logs, and classroom assessments. The data indicate that the student needs support to interact appropriately with his peers, particularly in "less structured settings." The data also indicate that the student demonstrates inappropriate

attention-seeking behaviors, noncompliant behaviors, and disruptive behaviors in the classroom (Doc. d).

5. The IEP references a Functional Behavioral Assessment (FBA), which states that the student exhibits negative behavior when experiencing anxiety and frustration in class. The FBA indicates that the student does not accept assistance and often needs to leave the task or go to a separate room in order to calm down. When a negative peer interaction occurs, he may perseverate on the event throughout the school day (Docs. b and d).
6. In order to address the identified behavioral needs, the IEP includes annual goals for the student to improve his ability to participate appropriately in classroom and school activities; manage his feelings of anxiety, annoyance, frustration, and anger in the classroom setting; and to improve his social interaction skills with peers and teachers (Doc. d).
7. In order to assist the student in achieving the annual goals, the IEP requires that the student be provided with special education instruction from a special education teacher in the general education classroom in order to address “requisite learning skills” and counseling as a related service (Doc. d).
8. The team determined that the least restrictive environment (LRE) in which the student’s IEP can be implemented is the general education classroom. The IEP includes supports to be provided to the student in order to implement his program in the LRE, such as extended time to complete assignments and assessments and a “time-out pass,” which is clarified in the BIP (Doc. d).
9. The IEP team developed a BIP to provide the student with supports to his frustration and anxiety. The supports include:
  - a. Breaking down large tasks into manageable parts;
  - b. Allowing the student to use a self-selected “time-out” of the classroom for up to ten (10) minutes;
  - c. Giving the student a teacher-directed “time-out” in the classroom or in another room;
  - d. Providing the student with verbal reminders of time limits for work completion and “time-outs;”
  - e. Clearly delineating rules and expectations and consistently enforcing them;
  - f. Using “if/then” statements;
  - g. Limiting conversations with the student during a “crisis” to only reminders of his choices;
  - h. Notifying the student of changes in his daily routine when possible;
  - i. Providing the student with positive ways to gain attention;
  - j. Ignoring or redirecting the student when he displays minor inappropriate behaviors;
  - k. Use of a behavior chart;

- l. Assigning the student a regular “job” for which he is responsible, such as cleaning up a certain area of the class, taking messages to the office, or assisting in the media center;
  - m. Encouraging and assisting the student with opportunities for appropriate social interactions;
  - n. Avoiding negotiations with the student;
  - o. Keeping responses to the student brief;
  - p. Offering the student a “face-saving path” out of a potential conflict;
  - q. Continuing private discussions about the student’s behavior, using non-confrontational approaches;
  - r. Avoiding asking the student “why” questions;
  - s. Noticing and appreciating any compliant behavior;
  - t. Offering the student choices, such as permitting him to select with whom he will work, negotiating when a project is due, and choosing what book to read for an assignment; and
  - u. Remaining calm when he is defiant (Doc. c).
10. The BIP also includes a “crisis intervention plan” for use when the student becomes “noncompliant *and* verbally and/or physically disruptive.” The plan states that teachers should first give the student a verbal reminder and offer him the opportunity to take a break. If the student does not comply with the choices, the teacher should direct the student to take a teacher-directed “time out” to a designated alternative location with adult support. The teacher is to call the office to inform them additional adult support may be needed, and the student is to be escorted to the “time-out” location (Doc. c).

### **October 1, 2012 IEP Team Meeting**

11. On October 1, 2012, the IEP team convened and conducted a three-year reevaluation. The documentation of the meeting indicates that the team considered reports of the student’s teachers and service providers that the student continues to struggle to maintain appropriate behaviors and regulate his emotions. The reports also indicate that the student “has not learned an appropriate way to utilize his ‘time-out pass’ and decompress so that he is able to access instruction” (Doc. f).
12. Based on this information, the IEP team recommended that educational, psychological, and functional behavioral assessments be conducted. The complainant provided written consent for the assessments to be conducted (Doc. e).
13. The team also revised the annual goals based on reports of the student’s progress, increased the amount of special education instruction to be provided to the student in order to assist him in achieving the annual goals, and determined that the student requires additional supports, including monitoring the student’s group work and preferential seating (Doc. f).

### **First Quarter Progress Reports**

14. The IEP progress reports, dated November 7, 2012 indicate that the student was making sufficient progress to meet his “requisite learning behaviors” goal and one (1) of his social, emotional, and behavioral goals. However, the reports indicate that he was not making sufficient progress toward achieving the goal related to maintaining appropriate social interactions with teachers and peers (Doc. x).

### **November 19, 2012 IEP Team Meeting**

15. On November 19, 2012, the IEP team convened to review the results of the assessments. The report of the results of the academic assessment indicate that the student is performing in the “average” range in all academic areas and that his academic abilities do not impact his ability to access the general education curriculum (Docs. h and k).
16. The team reviewed the results of the psychological assessment, which indicates that the student’s cognitive ability is in the “average” range and that the student demonstrates a weakness in “processing speed” (Docs. i and k).
17. The team also reviewed the FBA results, which identifies additional interfering behaviors, including ripping up assignments when frustrated by the task, escalating his behaviors when offered help, and using his “time-out pass” inappropriately to go to places other than where he is supposed to go to access the “time-out,” including other teachers classrooms and offices (Docs. g and k).
18. The FBA results also indicate that interventions in the BIP, including addressing the behavior either publically or in private, setting limits, providing a consequence in class, using the “time out pass,” verbal prompts, and group counseling have been largely unsuccessful in addressing the student’s behaviors. The results further indicate that supports that have moderate success in addressing the student’s behaviors include offering the student choices, individual counseling, and “planned ignoring” (Docs. g and k).
19. Based on the review of the information, the team determined that the student continues to qualify as a student with a disability who requires special education and related services. However, due to time constraints, the team agreed to reconvene to review the draft BIP (Docs. j and k).

### **December 10, 2012 IEP Team Meeting**

20. On December 10, 2012, the IEP team reconvened and reviewed the draft BIP. The documentation indicates that the team determined that additional behavioral supports would be provided to address the new behaviors, including providing the student with role-playing opportunities with the guidance counselor or the school psychologist, removing the student to a quiet place to complete work independently, providing the student with a “self-regulation checklist” and reviewing it weekly with an adult, building



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a break into the student's schedule, providing the student with a "situation processing sheet" to be used after very positive or very negative situations, and providing visual "choice cards" to use when presenting the student with choices (Docs. l-n and aa-cc).

21. The complainant presented the team with a "schedule" that she uses with the student at home and the team adapted the "schedule" for use within the school setting (Doc. n).
22. The team also discussed several options to address the complainant's concerns that the guidance office and the administrative office are not appropriate places for the student to go in order to use his "time-out pass." The team agreed to "explore" other possible locations, but no final decision was made (Docs. l-n).
23. The team also determined that it would reconvene on January 11, 2013 to revise the IEP to include results for the assessments (Doc. n).

#### **January 11, 2013 IEP Team Meeting**

24. On January 11, 2013, the IEP team reconvened and considered reports of the student's teachers that his classroom performance is inconsistent, that when the subject matter interests him, he works well, and that he is "a bright young man" (Doc. p).
25. The team began to revise the student's annual goals based on reports of his progress. However, the documentation of the meeting indicates that, due to time constraints, the team did not complete the revision of the student's program and agreed to reconvene on January 31, 2013 (Doc. p).

#### **January 31, 2013 IEP Team Meeting**

26. On January 31, 2013, the IEP team reconvened and considered a report from the school social worker that the student's coping skills "are deteriorating" (Doc. q).
27. The team completed its revision of the annual goals and began to review and revise the supplementary aids and services to be provided to the student based on reports of his progress (Doc. q).
28. The complainant expressed concern that the "time-out pass" has not been successful because the locations offered to him are not appropriate and she expressed her belief that the student needs an "advocate" who would be available exclusively to the student at any time during the school day (Doc. q).
29. Due to time constraints, the team did not complete the review and revision of the student's program and agreed to reconvene on February 15, 2013 (Doc. q).

## **Second Quarter Progress Reports**

30. IEP progress reports, dated February 1, 2013, indicate that the student is not making sufficient progress to meet any of the annual IEP goals (Doc. x).

## **February 15, 2013 IEP Team Meeting**

31. On February 15, 2013, the IEP team reconvened and clarified the use of the “time-out pass.” The team determined that the student could take a ten (10) minute break to go to the school psychologist’s office or the hallway in front of the gymnasium or he could walk the hallways with adult supervision. The team determined that he cannot use his “time-out pass” more than one (1) time per class period and he must have a “timer” to keep track of his ten (10) minutes (Docs. r and s).
32. The documentation of the meeting indicates that school-based members of the IEP team decided that the student’s IEP can no longer be implemented at XXXXXX MS because the student needs a small classroom environment with daily crisis intervention and instruction in social pragmatics and “requisite learning skills” embedded throughout the school day. The team determined that the student would be referred to the “Central IEP Team” for the determination of a more restrictive placement. The complainant disagreed with this decision (Docs. r and s).
33. The IEP team agreed to provide the student with additional supports pending the “Central IEP Team” meeting to determine the location of the student’s placement, including an increase in the amount of special education instruction, an increase in the amount of counseling as a related service, and a temporary support aide (Doc. s).

## **March 14, 2013 IEP Team Meeting**

34. On March 11, 2013, the AACPS received verification that the student could not attend school due to an emotional condition (Doc. v).
35. On March 14, 2013, the IEP team convened and determined the services to be provided to the student while he is unable to attend school due to the emotional condition (Docs. t and u).

## **“Central IEP Team” Meeting**

36. The complainant reports that she and the AACPS are currently attempting to schedule the IEP team meeting for a mutually convenient time (Doc. w).

## **Discussion/Conclusions:**

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

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of the student. In the case of a student whose behavior impedes the student's learning or that of others, the team must consider the use of positive behavioral interventions and supports and other strategies, to address that behavior (34 CFR §300.324).

Based on the Findings of Facts #4 - #36, the MSDE finds that the IEP team has considered the evaluative data and the complainant's concerns and determined behavioral supports to be provided to address the social, emotional, and behavioral needs identified. Based on those same Findings of Facts, the MSDE further finds that the team has monitored the student's progress and continued to meet throughout the 2012-2013 school year to consider additional supports. Therefore, the MSDE finds no violation regarding this allegation.

### **Additional Discussion**

The United States Department of Education, Office of Special Education Programs, 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 (SEA) must review the evaluative 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).

When the SEA determines that the public agency has not followed proper procedures, it can require the local public agency to ensure that the IEP team follows proper procedures to review and revise, as appropriate, the program to ensure that it addresses the needs identified in the data and determine a remedy to the student for loss of appropriate services (OSEP Letter #00-20).

The SEA may not, however, overturn an IEP team's decisions. Parents may challenge an IEP team's decisions by filing a due process complaint or requesting mediation to resolve the dispute (OSEP Letter #00-20).

The MSDE understands that the complainant disagrees with the IEP team's decisions about the student's program and placement. However, because there have been no violations identified with respect to the procedures followed when reviewing and revising the student's IEP, this office does not have the authority to require the school system to take additional steps with respect to the review of the IEP by the IEP team. If the complainant continues to disagree with the IEP team's determinations, she maintains the right to request mediation or to file a due process complaint regarding the issue.

### **ALLEGATION #3:                    PROVISION OF A "TIME-OUT PASS" SINCE OCTOBER 1, 2012**

#### **Findings of Facts:**

37.     The IEP in effect between October 1, 2012 and February 15, 2013 required that the student be provided with a "time out pass" to use in "situations in which he becomes agitated." The IEP clarifies that he may leave the classroom for no more than ten (10)

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minutes and go the guidance counselor, the school psychologist, or to the school administrators' offices (Doc. d).

38. There is documentation that the student used the "time out" pass between October 1, 2012 and February 15, 2013 but that he used it inappropriately to skip class, visit other areas of the school, take indirect routes to the designated location, and engage in verbal aggression with school staff and peers (Docs. g, k, l, n, q, and r).
39. There is documentation that the complainant expressed her concern that the locations required by the IEP for the student to access his "time out" were not appropriate to address his needs to deescalate and that the IEP team revised the use of the "time-out pass" to address this concern (Docs. k, n, q, r, and s).

#### Discussion/Conclusions:

The public agency is required to ensure that the student is provided with the special education and related services required by the IEP (34 CFR §300.101). In this case, the complainant alleges that because the locations to which the student was required to go in order to access his "time out" were inappropriate, the student was not provided with the "time-out pass" (Doc. a).

Based on the Findings of Facts #38 - #40, the MSDE finds that there is documentation that the student used the "time-out pass" since October 1, 2012 and that the IEP team has considered the complainant's concerns regarding the location of the "time-out." Therefore, the MSDE finds no violation regarding this allegation.

#### **CORRECTIVE ACTION/TIMELINE:**

The MSDE requires the AACPS to provide documentation by the end of the 2012-2013 school year, that the student's educational record accurately reflects the removals from school that resulted from the December 12, 2102 incident.

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

#### **TECHNICAL ASSISTANCE:**

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

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

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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 Action contained in this letter should be addressed to this office in writing. The complainant and the school system maintain the right to request mediation or to file a due process complaint, if they disagree with the identification, evaluation, placement, or provision of a Free Appropriate Public Education (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 due process.

Sincerely,

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

MEF:ks

cc : Kevin M. Maxwell  
Alison Steinfelds  
XXXXXXXXXX  
Martha J. Arthur  
Dori Wilson  
Anita Mandis  
Kathy Stump