




Karen B. Salmon, Ph.D.
State Superintendent of Schools

March 6, 2020




Ms. Trinell Bowman
Executive Director
Department of Special Education
Prince George's County Public Schools
John Carroll Elementary School
1400 Nalley Terrace
Landover, Maryland 20785

RE: 
Reference: #20-081

Dear Parties:

The Maryland State Department of Education (MSDE), Division of Early Intervention and Special Education Services, has completed the investigation of the complaint regarding special education services for the above-referenced student. This correspondence is the report of the final results of the investigation.

ALLEGATIONS:

On January 7, 2020, the MSDE received a complaint from  hereafter, "the complainant," on behalf of her son, the above-referenced student. 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 student.

The MSDE investigated the following allegations:

1. The PGCPS did not ensure that the student's behavior arising out of inattention, depression, and anxiety were addressed from January 7, 2019 until the end of the 2018-2019 school year, in accordance with 34 CFR §300.324.
2. The PGCPS did not ensure that a Behavioral Intervention Plan (BIP) was developed from January 7, 2019 until the end of the 2018-2019 school year, consistent with the decision made by the IEP team in October 2018, in accordance with 34 CFR §§300.101 and .323.

3. The PGCPS did not ensure that the Individualized Education Program (IEP) team addressed the student's lack of school attendance during the second (2nd) and third (3rd) quarters of the 2018-2019 school year, in accordance with 34 CFR §300.324.
4. The PGCPS did not ensure that the report of the student's progress towards achievement of the annual IEP goal to improve attention, made in February 2019, was consistent with the data, in accordance with 34 CFR §300.324.
5. The PGCPS did not ensure that the IEP in effect from January 7, 2019 until the end of the 2018-2019 school year included the required content, in accordance with in accordance with 34 CFR §300.320.
6. The PGCPS did not ensure that the student was provided with special education instruction in a resource room class as required by the IEP from January 7, 2019 until the end of the 2018-2019 school year, in accordance with 34 CFR §§300.101 and .323.
7. The PGCPS did not ensure that the student was provided with notes and outlines, small group instruction, use of a word processor, monitoring of test responses, and extra time, as required by the IEP from January 7, 2019 until the end of the 2018-2029 school year, in accordance with 34 CFR §§300.101 and .323.
8. The PGCPS did not ensure that proper procedures were followed when the student was disciplinarily removed from school during the second (2nd) and third (3rd) quarters of the 2018-2019 school year, in accordance with 34 CFR §300.530.
9. The PGCPS did not ensure that the student was provided with special education instruction in science by both general and special education teachers, as required by the IEP, after he returned to school during the 2018-2019 school year, in accordance with 34 CFR §§300.101 and .323.
10. The PGCPS did not ensure that the IEP team's May 2019 decisions about how to remediate the loss of services to the student were consistent with the data, in accordance with 34 CFR §300.324.
11. The PGCPS has not taken appropriate steps to ensure that the student's educational record has been transferred to the Montgomery County Public Schools (MCPS) in response to the MCPS' request at the start of the 2019-2020 school year, in accordance with 34 CFR §300.323, COMAR 13A.08.02, and *The Maryland Student Records Manual*.

BACKGROUND:

The student is twenty (20) years old, is identified as a student with a Specific Learning Disability under the IDEA, and has an IEP that requires the provision of special education services.

On October 21, 2018, the student began attending [REDACTED] after transferring from the MCPS to the PGCPs.

From January 14, 2019 until April 10, 2019, the student did not attend school.

On April 10, 2019, the student again began attending [REDACTED]

At the start of the 2019-2020 school year, the student enrolled in the MCPS.

The complainant reports that the student has been disciplinarily removed from school by the MCPS and is seeking to enroll in a General Educational Development Testing Program (GED program).

FINDINGS OF FACTS:

1. The IEP in effect on January 7, 2019 is dated October 25, 2018. On October 25, 2018, the IEP team reviewed the MCPS IEP, dated October 5, 2018, which was in effect when the student transferred to the PGCPs on October 21, 2018. On October 25, 2018, the PGCPs IEP team decided to continue the October 5, 2018 MCPS IEP. The IEP states that the student's "weaknesses in verbal comprehension and information processing, along with symptoms of ADHD-inattentive type, anxiety and depression impact his learning in the areas of reading comprehension, math problem solving, written language content, organization, and attention/focus."
2. The IEP states that the IEP team considered data from 2016 classroom-based assessments, a 2017 educational assessment, 2017 teacher reports, and first (1st) quarter report cards for the 2018-2019 school year. Based on this information, the team found that the student, who was in the tenth (10th) grade, was performing at between a fifth (5th) and sixth (6th) grade level in reading comprehension. The team documented that, while the student was able to answer basic comprehension questions and identify themes and central ideas, he struggled to identify textual evidence or analyze the author's choices. The team also documented that the student's work is often incomplete, that he rarely completes assignments independently, and he often refuses to work in class.
3. The IEP states that, based on data from 2016 classroom-based assessments, a 2017 educational assessment, 2017 teacher reports, and first (1st) quarter report cards, the student was performing at the eighth (8th) grade level in math problem solving. The team documented that the student demonstrated difficulty with material that involves fractions, percentages, conversions, and decimals, and that his division skills were "quite weak." The IEP states that the student had good basic skills but did not always learn new lessons, had trouble staying focused and missed important topics and information. It further states that, while the student does well with models and examples that require single step solutions, he struggled with multi step problems.

4. The IEP states that, based on data from 2016 classroom-based assessments, a 2017 educational assessment, 2017 teacher reports, and first (1st) quarter report cards, the student was performing at the eighth (8th) grade level in written language. The IEP states that the student demonstrated the ability to write cohesive, persuasive arguments with a solid claim and supporting evidence, but that he had not earned above a fifty percent (50%) during the first two (2) major writing assignments because he had poor attendance and refused to complete work during class and at home.
5. The IEP states that, based on data from a 2017 assessment, 2017 teacher reports, and first (1st) quarter report cards, the student was not meeting grade level expectations and was demonstrating difficulty with all areas of executive functioning, including organization, task initiation, and self-monitoring. The IEP states that the student “often does not arrive for class with necessary materials and sometimes does not keep a backpack or notebook.” It states that “he misses assignments due to unexcused absences and does not make up missed work or attend academic support,” and that “he does not make effective use of resource class to get organized or complete assignments.”
6. The IEP states that, based on data from a 2017 assessment, 2017 teacher reports, and first (1st) quarter report cards, the student meets the criteria for Attention Deficit Hyperactivity Disorder (ADHD), predominantly the inattentive type. It states that the student “often arrives late or not at all, then spends much of the period talking to peers, using his phone, or putting his head down on the desk,” and that “his attitude and diligence were in significant decline over the course of the first quarter.”
7. The IEP states that, based on parent and teacher input, direct observations, and discipline records, the student’s attendance was “very spotty,” did not regularly attend all classes when he came to school, did not follow school rules, had conflicts with peers, was disrespectful to school staff, and struggled with handling frustration and disappointment in an appropriate manner. It states that the student acknowledged “the impact of excessive absences on his overall school progress.”
8. The IEP includes goals for the student to improve self-management, organization, attention, reading comprehension, written language content, and math problem solving skills consistent with the identified areas of need. It requires the provision of special education instruction and many supports to assist him with achieving the goals.
9. The IEP requires five (5) forty-five (45) minute sessions of special education instruction per week in the general education classroom from a special education teacher and fifteen (15) forty-five (45) minute sessions of special education instruction per week in the general education classroom from both special and general education teachers. It states that this includes “one period of resource class” and “supported/co-taught English, math, and social studies classes.” It also includes transition activities such as taking the Scholastic Aptitude Test and exploring work opportunities through volunteering in his areas of interest.

10. The supports required by the IEP include repetition of directions, provision of a proofreading checklist, assistance with organization including the use of organizational aids and structured time for organization of materials, monitoring of independent work, and checks for understanding including having the student repeat and rephrase information. They also include frequent and immediate feedback, provision of strategies to initiate and sustain attention, reinforcement of positive behavior through non-verbal communication, encouragement to ask for assistance, and preferential seating.
11. In addition, the student's IEP requires the provision of notes and outlines to supplement his own so that he can concentrate on teacher lectures, small group instruction and testing to reduce distraction to himself and others, the provision of a word processor to assist with written language content, monitoring of test responses, and extended time.
12. The Prior Written Notice (PWN) document generated by the PGCPS IEP team following the October 25, 2018 IEP team meeting states "the IEP was revised and the BIP was reviewed." However, there was no BIP to review. The documentation from the MCPS reflects that in December 2017, the MCPS IEP team decided that a BIP would be developed as soon as the complainant provided written consent for a Functional Behavioral Assessment (FBA) to be conducted, and another request was made following a disciplinary removal of the student from school in 2018, but that consent was not provided. The MCPS IEP team reconfirmed at the October 5, 2018 IEP team meeting the student's need for an FBA and BIP after an incident that involved his throwing a vase.
13. The PWN document generated by the PGCPS IEP team following the October 25, 2018 IEP team meeting states "the team also reviewed his progress and discussed with the mother that he was making tremendous behavioral and academic progress." The PWN states that the documents used as a basis for making these decisions were the MCPS assessments, IEP, BIP, credits earned by the student and his discipline record.
14. The IEP dated October 25, 2018 continues to state, as the October 5, 2018 MCPS IEP stated, "the team has determined that [the student] requires a [Functional Behavioral Assessment (FBA)] and a BIP to address concerning behavior." However, there is no documentation that the PGCPS IEP team requested that the complainant consent to such an assessment, as the MCPS IEP team had done.
15. The PGCPS Academic Resource class assists students with addressing IEP goals and support with individual learning strategies. The College Career Research and Development class provides students with career development and work-based learning opportunities. From January 7, 2019 until May 8, 2019, the student was placed in the College Career Research and Development class instead of the Academic Resource class that was required by the IEP.
16. There is no documentation that the student was provided with the accommodations and supports required by the IEP.

17. The student's disciplinary record reflects that he was disciplinarily removed from school for three (3) days following an incident that occurred on January 11, 2019. He did not return to school until April 10, 2019.
18. On February 15, 2019, reports were made on the student's progress towards achievement of the annual IEP goals. Some of the reports, including the one on the goal to improve attention, stated that the student was making sufficient progress towards achieving the goals by December 7, 2018 even though the student had not been attending school for over one (1) month and even though the date for achieving the goals had passed.
19. In March 2019, the complainant sent the student's teachers electronic mail (email) messages asking them to send home his school work.
20. On March 26, 2019, the PGCPS Central Office staff reached out to the complainant by email to assist, which resulted in the student's return to school on April 10, 2019.
21. On April 10, 2019, the complainant sent an email message to the school staff expressing concern that, following the January 11, 2019 incident, the principal informed her that the student had to be withdrawn from school. The complainant indicated that based on that information, she did not return the student to school until she was contacted by the school system and informed that he was not withdrawn from school. The MSDE has not been provided with a response regarding this matter from the PGCPS.
22. On May 8, 2019, the IEP team convened and determined that "there was a lack of progress during the 3rd quarter due to attendance." The team documented that it had "failed to meet to discuss lack of progress," and determined the remedy to redress the violation. However, there is no documentation that the team addressed the student's continuing lack of consistent attendance following the meeting.
23. The remedy determined by the team on May 8, 2019 included the following:
 - a. Provision of a summer school course for the student, which could be a course that the student failed or a class required for graduation;
 - b. Provision of a one-to-one transition facilitator assist the student with agency linkages and support with exploring employment options to prepare him for transition from high school, along with a web-based program that supports students in exploring and developing postsecondary plans;
 - c. Provision of after school tutoring for the remainder of the school year to ensure support with current classes and any additional support to address IEP goals; and

- d. Changing the student's schedule from a Career, Research, and Development class to an Academic Resource class to provide additional academic and organizational supports.

The explanation for the decision was documented as follows:

The IEP team reviewed [the student's] grades and attendance as well as feedback from his teachers and parent. [The student] is capable and does well when he is in class and turns in his work. His attendance impacted his instructional programming which resulted in loss of instruction and availability of his special education services. A remedy was offered to the parent for lack of access and progress.

24. The complainant enrolled the student in the MCPS for the 2019-2020 school year.
25. The PGCPS provided the MSDE with a printout that states that a request was received on September 9, 2019 and a release made by the data manager to [REDACTED] on September 10, 2019 with the following comment "Emailed Montgomery Co. to delete their SIS_DB record 9/10/2019."
26. However, the complainant provided the MSDE with a copy of a request for records from [REDACTED] High School addressed to [REDACTED] dated September 3, 2019 sent by facsimile, which contains a received receipt date of September 3, 2019 at 9:52 a.m. The complainant also provided an email from her to the PGCPS school staff, dated November 22, 2019, stating that she was informed by the staff at [REDACTED] that they made a request for records on September 3, 2019 and had not received them as of November 18, 2019. In the email, the complainant requested that the records be copied and that she be informed when she could pick them up and deliver them to [REDACTED]. The MSDE has not been provided with a response regarding this matter from the PGCPS.

CONCLUSIONS:

Allegation #1 Addressing Inattention, Depression, and Anxiety

In its written response, the PGCPS states that when it "rolled over" the MCPS IEP on October 25, 2018, the IEP team should have extended out the date for completion of the annual goals developed in December 2017 to October 25, 2019. However, the PGCPS provides no explanation of the basis for continuing the goals beyond one (1) year of development.

The MSDE finds this statement to be inconsistent with an understanding that the annual IEP goals are to be achieved annually or revised prior to the end of the year they are in effect to address lack of expected progress.

Based on the Finding of Fact #18, the MSDE finds that the IEP team did not address the lack of expected progress towards achievement of the goal to improve attention or document a basis for

extending the goal beyond one (1) year, in accordance with 34 CFR §300.324. Therefore, this office finds that a violation occurred with respect to the allegation.

Allegation #2 Development of a Behavioral Intervention Plan (BIP)

In its written response, the PGCPS states that the October 25, 2018 PGCPS IEP team decided that the October 5, 2018 MCPS IEP remained appropriate and decided to copy it verbatim. At the same time, the PGCPS states that the PGCPS IEP team continued the language in that October 5, 2018 MCPS IEP that a FBA and BIP were needed “in error.” The school system states:

Nowhere in the PWN of the October 25 meeting is there any reference to any team member suggesting the need for an FBA/BIP, which is consistent with the fact that the team members would have been aware that the student did not present with the type of behaviors that would have required an FBA/BIP during his prior period of attendance.

Based on the Findings of Facts #12 and #13, the MSDE finds that the PWN from the October 25, 2018 PGCPS IEP team meeting states that a BIP was reviewed by the PGCPS IEP team. Therefore, the documentation does not support the PGCPS’ argument that the PWN makes no reference to a BIP.

The PGCPS also points to the language in the PWN of the October 25, 2018 PGCPS IEP team meeting that the student was making “tremendous behavioral and academic progress while in MCPS” as supporting its position that the language about the FBA and BIP were continued in error. At the same time, the school system acknowledges that the “MCPS IEP team reconfirmed, at the October 5, 2018 IEP team meeting, the student’s need for an FBA/BIP after an incident that led to him throwing a vase.”

Based on the Finding of Fact #13, the MSDE finds that the data reported as a basis for the October 25, 2018 decision that the student made tremendous behavioral progress, i.e., the student’s BIP, does not exist. Further, based on the Findings of Facts #1 - #8, #12 and #13, the MSDE finds that the data reported as a basis for the October 25, 2018 decision that the student made tremendous academic and behavioral progress, i.e., the student’s IEP and discipline record, is inconsistent with the decision, in accordance with 34 CFR §300.324.

In its written response, the PGCPS also suggests that the MCPS IEP team chose not to conduct an FBA and develop a BIP because it did not believe that they were needed. Based on the Finding of Fact #12, the MSDE finds that the documentation reflects that the MCPS did not conduct an FBA and develop a BIP because the complainant had not provided written consent, as required by 34 CFR §300.300, and not because they were no longer determined to be necessary.

Based on the Finding of Fact #14, the MSDE finds that there is no documentation that the PGCPS IEP team attempted to obtain parental consent for a FBA, as the MCPS IEP team had done, in accordance with 34 CFR §§300.300 and .324. Therefore, this office finds that the PGCPS did not take appropriate steps to address the student's behavior through a BIP, and that a violation occurred with respect to the allegation.

Allegation #3 Addressing Lack of School Attendance

While the PGCPS acknowledges, "truancy and tardiness were issues for the student," at the same time, it states "behavior was not." The MSDE finds these statements to be internally inconsistent and fail to reflect that truancy and tardiness can constitute behavior that interferes with a student's progress, which the IEP team is required to address.

Based on the Findings of Facts #1 - #7, and #18 - #24, the MSDE finds that the PGCPS did not address the student's interfering behavior of truancy and tardiness, in accordance with 34 CFR §300.324. Therefore, this office finds a violation with respect to this allegation.

Allegation #4 February 2019 IEP Progress Report

Based on the Finding of Fact #18, the MSDE finds that the progress reported on the student's goal to improve his attention was not consistent with the data, in accordance with 34 CFR §300.324. Therefore, this office finds that a violation occurred with respect to this allegation.

Allegation #5 IEP Content

In this case, the complainant alleges that the IEP did not include the following:

- a. A statement of present levels of academic and functional performance in the areas of reading comprehension, math problem solving, written language, organization, and self-management behavior; and
- b. A statement of the amount of special education instruction to be provided in an academic resource class.

Based on the Findings of Facts #2 - #7, the MSDE finds that the PGCPS did ensure that the IEP included a statement of present levels of academic and functional performance in the areas of reading comprehension, math problem solving, written language, organization, and self-management behavior, in accordance with 34 CFR §300.324. Therefore, this office does not find that a violation occurred with respect to this aspect of the allegation.

Based on the Finding of Fact #9, the MSDE finds that the PGCPS did ensure that the IEP included a statement of the amount of special education instruction to be provided in an

academic resource class, in accordance with 34 CFR §300.324. Therefore, this office does not find that a violation occurred with respect to this aspect of the allegation.

Allegation #6 Provision of Special Education Instruction in a Resource Room

In its written response, the PGCPS acknowledges that the student was placed in a College Career Research and Development class instead of the Academic Resource class required by the IEP, and asserts that it was because the student required the College Career Research and Development class to graduate. The PGCPS asserts that both classes “are small, self-contained classes and both were taught by certificated special educators.”

Based on the Findings of Facts #15 and #23, the MSDE finds that the College Career Research and Development class did not provide the same service provided in an Academic Resource class required by the IEP. Based on those Findings of Facts, the MSDE finds that the PGCPS did not ensure that the student was provided with special education instruction in a resource room as required by the IEP from October 21, 2018 until May 8, 2019, in accordance with 34 CFR §§300.101 and .323. Therefore, this office finds that a violation occurred with respect to the allegation.

Allegation #7 Provision of IEP Supports

Based on the Findings of Facts #10, #11, and #16, the MSDE finds that the PGCPS did not ensure that the student was provided with the supports required by the IEP, in accordance with 34 CFR §§300.101 and .323. Therefore, this office finds that a violation occurred with respect to the allegation.

Allegation #8 Disciplinary Procedures

In this case, the complainant alleges that, following an incident on January 11, 2019 in which the student was accused of acting in a disrespectful manner to the school staff, the school staff required him to withdraw from school and did not provide him with the IDEA disciplinary protections.

Based on the Findings of Facts #17 - #22, the MSDE finds that there is no documentation that the student was disciplinarily removed from school in excess of ten (10) school days, and thus, was not entitled to the disciplinary protections, in accordance with 34 CFR §300.530. Therefore, this office does not find that a violation occurred with respect to the allegation.

Allegation #9 Provision of Special Education Instruction in Science

Based on the Finding of Fact #9, the MSDE finds that the IEP did not require the provision of special education instruction in science from both a general and special education teacher. Therefore, this office does not find that a violation occurred with respect to the allegation.

Allegation #10

May 2019 IEP Team Decisions

Based on the Findings of Facts #9, #22, and #23, MSDE finds that, while components of the services offered to compensate the student for the loss of services during the third (3rd) quarter of the school year were already required by the IEP, additional services above and beyond what was required by the IEP were offered. Therefore, this office does not find that a violation occurred with respect to the allegation and does not require additional services to remediate the lack of progress during the third (3rd) quarter of the 2018-2019 school year.

Allegation #11

Transfer of the Educational Record

Based on the Findings of Facts #25 and #26, MSDE finds that while there is documentation of some communication between the PGCPs and the MCPS by email on September 10, 2019, there is no documentation that the PGCPs ensured that the MCPS received the student's educational record, in accordance with 34 CFR §300.323, COMAR 13A.08.02, and *The Maryland Student Records Manual*. Therefore, this office finds that a violation occurred with respect to the allegation.

CORRECTIVE ACTIONS/TIMEFRAMES:

The IDEA requires that State complaint procedures include those for effective implementation of the decisions made as a result of a State complaint investigation, including technical assistance activities, negotiations, and corrective actions to achieve compliance (34 CFR §300.152). Accordingly, the MSDE requires the public agency to provide documentation of the completion of the corrective actions listed below.

The MSDE has established a reasonable timeframe below to ensure that noncompliance is corrected in a timely manner.¹ This office will follow up with the public agency to ensure that it completes the required action consistent with the MSDE Special Education State Complaint Resolution Procedures.

If the public agency anticipates that any of the timeframes below may not be met, or if either party seeks technical assistance, they should contact Dr. Nancy Birenbaum, Compliance Specialist, Family Support and Dispute Resolution Branch, MSDE, to ensure the effective implementation of the action.² Dr. Birenbaum can be reached at (410) 767-7770.

¹ The United States Department of Education, Office of Special Education Programs (OSEP) states that the public agency must correct noncompliance in a timely manner, which is as soon as possible, but not later than one (1) year from the date of identification of the noncompliance. The OSEP has indicated that, in some circumstances, providing the remedy could take more than one (1) year to complete. If noncompliance is not corrected in a timely manner, the MSDE is required to provide technical assistance to the public agency, and take tiered enforcement action, involving progressive steps that could result in the redirecting, targeting, or withholding of funds, as appropriate.

² The MSDE will notify the public agency's Director of Special Education of any corrective action that has not been completed within the established timeframe.

Student Specific

The PGCPS has offered a remedy for the violation related to the lack of expected progress due to lack of attendance during the third (3rd) quarter of the school year. The MSDE requires the PGCPS to redress the remaining violations, including those related to not seeking consent to conduct an FBA, not addressing the student's continued lack of regular attendance following the May 2019 IEP team meeting, and not implementing the IEP, as follows:

The MSDE requires the PGCPS to provide documentation by the end of the 2019-2020 school year that it has contacted the complainant to request information about whether the student is enrolled in a GED program. If the student is enrolled in a GED program, the PGCPS must provide documentation that it has offered to provide or pay for tutoring to assist the student with completing the program.

School Based

The MSDE requires the PGCPS to provide documentation by the start of the 2020-2021 school year of the steps taken at [REDACTED] School to ensure compliance with the following:

- a. That IEPs, PWNs, progress reports, and other student educational records contain accurate information;
- b. That student educational records are transferred to requesting schools in a timely manner;
- c. That each student receives the special education and supports required by the IEP;
- d. That steps are taken to obtain written parental consent to conduct assessments when transferring students' records indicate that assessments are recommended; and
- e. That the IEP team addresses any lack of expected progress towards achievement of annual IEP goals.

System Based

The MSDE requires the PGCPS to provide documentation by the start of the 2020-2021 school year of the steps taken to ensure that all schools within the school system comply with the following:

- a. That IEP goals not be continued beyond one (1) year of development without explanation of why they were not achieved but remain appropriate, including those for transferring students with an IEP that will be continued upon transfer to a new school within the school system; and
- b. That IEP teams address interfering behavior of lack of regular school or class attendance.

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

Ms. Trinell Bowman

March 6, 2020

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As of the date of this correspondence, this Letter of Findings is considered final. This office will not reconsider the conclusions reached in this Letter of Findings unless new, previously unavailable documentation is submitted and received by this office within fifteen (15) days of the date of this correspondence. The new documentation must support a written request for reconsideration, and the written request must include a compelling reason for why the documentation was not made available during the investigation. Pending this office's decision on a request for reconsideration, the public agency must implement any corrective actions within the timeframes reported in this Letter of Findings.

The parent 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 a due process complaint.

Sincerely,

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

c: Monica Goldson
Gwendolyn Mason
Barbara Vandyke
[REDACTED]
Jeffrey Krew
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