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June 23, 2017

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Mr. Sean Conley, Chief Academic Officer
Ms. Jennifer Dull, Director, Strategy and Compliance
Mr. Macon Tucker, Manager of Specialized Services
Baltimore City Public Schools
200 East North Avenue, Room 204-B
Baltimore, Maryland 21202

RE: XXXXXXXXXXXX and
Similarly-Situated Students
Reference: #17-134

Dear Parties:

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

ALLEGATION:

On May 3, 2017, the MSDE received a complaint from Mr. XXXXXXXXXXXX, hereafter, “the complainant,” on behalf of his daughter, and similarly-situated students. In that correspondence, the complainant alleged that the Baltimore City Public Schools (BCPS) violated certain provisions of the Individuals with Disabilities Education Act (IDEA) with respect to the above-referenced student.

The MSDE investigated the allegation that the BCPS has not followed proper procedures when considering the need for Extended School Year (ESY) services for the above-referenced student and similarly-situated students, in accordance with 34 CFR §300.106, COMAR 13A.05.01.03 and 13A.05.01.08, and *MM v. School District of Greenville Co. (S.C.)*, 303 F3d. 523, 37 IDELR 183 (4th Cir. 2002).

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INVESTIGATIVE PROCEDURES:

1. On May 3, 2017, Ms. Anita Mandis, Chief, Complaint Investigation Section, MSDE, spoke with the complainant and clarified the allegation to be investigated.
2. On May 8 and 10, 2017, the complainant provided documentation to the MSDE for consideration.
3. On May 10, 2017, the MSDE sent correspondence to the complainant that acknowledged receipt of the complaint and identified the allegation subject to this investigation. On the same date, the MSDE notified Mr. Sean Conley, Chief Academic Officer, BCPS, Ms. Jennifer Dull, Director, Strategy and Compliance, BCPS, and Mr. Macon Tucker, Manager of Specialized Services, BCPS of the allegations and requested that the BCPS review the alleged violation.
4. On June 8, 2017, Ms. Mandis and Ms. Janet Zimmerman, Compliance Specialist, MSDE, conducted an interview with Ms. LaShawn Badham, Office of Nonpublic and Citywide Services, BCPS, at the BCPS Central Office. Mr. Darnell Henderson, BCPS legal counsel, attended the interview to provide information on the school system's practices and procedures, as needed.
5. On June 9, 2017, the MSDE received documentation from the BCPS for consideration.
6. The MSDE reviewed documentation, relevant to the findings and conclusions referenced in this Letter of Findings, which includes:
 - a. IEP, dated April 28, 2016;
 - b. IEP Progress Summary, dated April 20, 2017;
 - c. Letter from XXXXXXXXXXXXXXXXXXXX, addressed To Whom It May Concern, dated April 26, 2017;
 - d. IEP, dated April 27, 2017;
 - e. Prior Written Notice document, dated May 1, 2017; and
 - f. Correspondence from the complainant containing an allegation of a violation of the IDEA, received by the MSDE on May 3, 2017.

BACKGROUND:

The student is fourteen (14) years old and is identified as a student with Multiple Disabilities under the IDEA, including Autism, Intellectual Disability, Orthopedic Impairment, and Other Health Impairment. She has an IEP that requires the provision of special education instruction and related services. The student is placed by the BCPS at the XXXXXXXXXXXX, a nonpublic, separate, special education school (Docs. a, d, and f).

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FINDINGS OF FACTS:

1. In addition to Autism and an Intellectual Disability, the student has a seizure disorder, and feeding and respiratory disorders. She also has scoliosis and underwent spinal stabilization surgery on October 27, 2015. While the surgery greatly improved her posture through her trunk and pelvis, the student needs to relearn how to manage her body with the immobility of her spine (Docs. a and d).
2. The IEP includes a goal for the student to demonstrate relaxation of her lower extremities to obtain extension of her legs after a change in position when given moderate to maximal assistance for extension. It also includes goals for the student to maintain upright head posture “in supported sit” and to move herself or an object, and requires the provision of physical therapy to assist her in achieving the goals. The IEP further includes goals to improve communication, fine motor, self-care, reading comprehension, and math problem solving skills, and special education and related services to assist the student in achieving the goals (Docs. a and d).
3. The IEP in effect since April 28, 2016 requires the provision of special education and related services to assist the student in achieving the IEP goals. It includes the requirement that the physical therapist provide one hour of quarterly parent training to address passive range of motion and stretching, positioning, and motor activities to enhance the physical therapy services received in school and to “maintain her comfort level following school breaks” (Docs. a and d).
4. The IEP team, including the BCPS Office of Nonpublic and Citywide Services staff, met on April 27, 2017 and May 1, 2017 and conducted the annual IEP review and determined the need for ESY services. The team documented that the student achieved one out of the three communication goals, one out of the two fine motor skills goals, and made “some progress” on the remaining goals.¹ The team also documented the following:

[The student’s] performance and progress on her [physical therapy] goals and objectives over this year have been impacted by a prolonged recovery from orthopedic surgery, increased flexor tone and continued tightness in her lower extremities, decreased level of alertness during the first [seven to eight] months of the IEP, and chronic health issues. [The student] has not completed any of the [physical therapy] goals and objectives on her current IEP but is now making progress on them since her alertness and activity levels have increased (Docs. a, d, e, and review of audio recording of the IEP team meeting).

¹ The IEP included 10 goals (Doc. a).

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5. In addition, the team documented the following:

[The student's] hips do not extend enough for her to be comfortably positioned in prone and her hip flexor tightness, along with the immobility of her spine, results in her being pitched onto her face. In order to be more comfortably positioned in prone, [the student] needs to be positioned with her hips over the wide end of a wedge.

The IEP states that the student “has more recently responded well to positioning in prone over a large therapy ball,” which “allows sufficient hip flexion for her to be comfortable” (Docs. a and d).

6. The team discussed that the student's hospitalizations were shorter in length this year, and that her last hospitalization was for pneumonia. The school nurse reported that the primary focus of her health plan was to monitor her chronic respiratory problems. The IEP team has documented that the student needs to learn how to balance her head over her trunk with the changes that have occurred to her spine through the surgery, and that repetition and practice of motor skills “is highly important for maintenance of effective swallowing and for her respiratory function” (Docs. a, d, and review of the audio recording of the IEP team meeting).
7. The complainant reported that this year, arrangements were made for the student to receive the same therapies she receives in school while in the hospital, which is why her hospitalizations were shorter. The complainant indicated that without continuous therapy, the student will experience an increase in hospitalizations and lose more instructional time, which will result in the regression that was experienced in the past. The school-based physical therapist indicated that she had been unaware that the therapies were not automatically continued during the student's hospitalizations in the past. She agreed that ensuring the continuation of the therapies while the student was hospitalized this year was an important factor (Review of the audio recording of the IEP team meeting).
8. The complainant indicated that based on the above information, he would be requesting ESY services for the student. The public agency representative responded that the team needed to complete its review of the IEP before considering ESY services and that they needed to determine whether the student's academic progress will be hampered if she does not receive ESY services² (Review of the audio recording of the IEP team meeting).

² The documentation of the previous year's ESY determination reflects the same discussion and states that “City Schools noted that only educationally relevant services are the responsibility of the school system (Doc. a).

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9. The audio recording of the May 1, 2017 portion of the meeting reflects that, following the review of the IEP, the team discussed that the student's annual IEP goals address critical life skills, including the areas of communication, self-care, motor skills, and academics. The public agency representative reported that the student was hospitalized twice during the school year, once for eight days, and a second time for nine days. The public agency representative further reported that the student had been unable to attend school due to illness on twenty-seven days, six of which were consecutive. The public agency representative stated that the student "did not experience regression in her skills and met a lot of the annual IEP goals even with a 68% attendance rate." Therefore, the public agency representative found that there was not a substantial likelihood of regression during skills during breaks from the school year (Docs. d, e, and review of the audio recording of the IEP team meeting).
10. The complainant disagreed that the student had met many of her IEP goals, and argued that the progress that was made during the school year was towards recouping the skills in which she had previously lost and that the student was able to make that progress only because last year the IEP team determined that ESY services would be provided (Review of the audio recording of the IEP team meeting).
11. The public agency representative reported that the student had not been determined to require ESY services in the years prior to the last school year, and indicated that information about the provision of ESY services during the last year was not relevant to the determination of whether she requires them to continue this year (Review of the audio recording of the IEP team meeting).
12. On May 1, 2017, the complainant provided a letter from the student's private physical therapist and neurologist, which states that since 2016, the student developed "significant knee joint contractures, limiting her functional mobility," which prevent her from "achieving full supported standing, as medically necessary for bone health, circulation, digestion and range of motion management." The letter contains a recommendation that the student receives "continuous therapies in the school environment," which is "imperative to ensure her continued participation in the school environment" and needed "to prevent adverse health events"³ (Doc. c and review of the audio recording of the IEP team meeting).
13. Despite the discussion of the student's present levels of performance at the April 28, 2017 portion of the meeting, the school-based physical therapist and the public agency representative reported that they were unaware of why the student experienced

³ While the letter was authored by two providers, only one of the authors signed the letter. However, no concerns were raised about this at the IEP team meeting (Doc. c and review of the audio recording of the IEP team meeting).

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frequent hospitalizations and that there is no data that indicates that services provided in the school setting prevents or reduces the student's hospitalizations. While the written summary of the meeting states that the team considered information from the student's private providers, the audio recording of the meeting reflects no discussion by the team of the information in the letter from the private providers or any request for the complainant to provide additional data to support his assertion (Doc. e and review of the audio recording of the IEP team meeting).

14. The public agency representative stated that the IEP team could not consider the services that the student was receiving outside of the school setting and had to presume that no services were being provided during the periods of time that the student was not in attendance at school. The public agency representative further stated that the therapies provided in the hospital setting would be considered medical services and not educational services, even if they were not provided by a physician, because of the setting in which they were provided (Review of the audio recording of the IEP team meeting).
15. The public agency representative noted that the student was to receive ESY services of physical therapy for two weeks following the end of the previous school year, but that she did not consistently attend school during that time period. The complainant reported that the student was enrolled in a private camp during the days that she did not attend ESY and that she received the same therapies she receives in school while at camp. The public agency representative again stated that the team would not consider such information and there was no request for the complainant to provide data to support his assertion (Review of the audio recording of the IEP team meeting).
16. The public agency representative stated that the IEP team was not saying that the student does not require services beyond the regular school year, but were saying that the school system was not responsible for the provision of those services. The public agency representative also stated that the difference between the students who receive ESY services and the student is that the student receives instruction in a 12 month program with over 200 days of school each year and the students who receive ESY services participate in a 180 day school year (Review of the audio recording of the IEP team meeting).
17. Prior to the discussion about ESY services, at the April 27, 2017 portion of the meeting, the complainant asked why the draft IEP reflected that none of the goals would be addressed through ESY. A school-based member of the team responded that none of the goals should have been addressed the previous year either because the student receives instruction in a 12 month program (Review of the audio recording of the IEP team meeting).

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18. At the May 1, 2017 portion of the meeting, the public agency representative stated that the complainant's request for IEP therapies to be provided during breaks in the school year was similar to requesting that those therapies be provided on the weekends and evenings during the regular school year. However, there is no indication that the IEP team considered whether the therapies could effectively be provided during non-school hours during breaks in services and if so, why this would not be sufficient during the regular school year (Review of the audio recording of the IEP team meeting).
19. Without considering any of the other required factors, the public agency representative announced the decision that the student does not require ESY services. The public agency representative noted that the complainant was in disagreement and reminded him of his right to resolve any disagreement through due process. When the complainant asked whether the team planned to consider the remaining required factors, the team proceeded to discuss the remaining factors. The team considered whether the nature and severity of the student's disability warrants the provision of ESY services and decided that it does. The team also considered whether there are interfering behaviors that would warrant the provision of ESY services and decided that there are no such behaviors (Review of the audio recording of the IEP team meeting).
20. The audio recording of the May 1, 2017 portion of the meeting reflects that the complainant argued that the special circumstances that were used as a basis for determining the need for ESY services last year continued to exist, i.e., the nature of the student's disability and her hospitalizations. The public agency representative reported that there was no information that the student is medically fragile. Despite the information provided during the discussion of the student's present levels of performance, the team decided that the student's surgery no longer serves as a special circumstance to be considered (Review of the audio recording of the IEP team meeting).
21. Despite the information provided during the discussion of the student's present levels of performance that the student was starting to get back to where she was with some of her skills since her last surgery, the school staff were reluctant to characterize these as breakthrough skills. The complainant argued that any recent skill development would be a breakthrough for the student since she had experienced such a significant loss of skills after surgery, and the occupational therapist agreed. However, the written summary of the meeting states that "the staff and City schools agree that there are not emerging skills or breakthrough opportunities that would be missed without ESY" (Review of the audio recording of the IEP team meeting).
22. The audio recording of the May 1, 2017 portion of the IEP team meeting reflects that the complainant and the public agency representative discussed that the student was found to require physical therapy as an ESY service the previous school year based on information from the school-based therapists about the student's regression of skills. They also discussed that the therapists have been informed that in the future they need to document

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the student's skills more specifically prior to and following foreseen breaks as well as how long recoupment takes. However, neither the progress reports provided by the school staff, dated April 30, 2017, nor the information provided at the meeting contain such information about whether or not the student experienced a regression of skills (Docs. a, b, and review of the audio recording of the IEP team meeting).

23. A review of documentation of the ESY services determination for the previous school year reflects that the related service providers reported that each time the student has an extended absence due to a school break, illness, or for medical procedures, she returns to school with increased tightness through her legs, and that she has difficulty tolerating positioning both in and out of her wheelchair. The team documented that "this trend is observed even over relatively short breaks of a few days." The team further documented the following:

Following breaks, [the student] quickly becomes uncomfortable in her wheelchair and begins to whine or cry. Upon removal from her wheelchair, [the student's] legs remain flexed and she is fearful of having her legs extended. She requires slow stretching and cannot be placed or moved into any position without extensive stretching of her legs. She displays a look of fear or may start to cry if stretched too rapidly or too far (Doc. a).

24. At the May 1, 2017 portion of the IEP team meeting, the school-based physical therapist reported that the student has not demonstrated the same difficulty transitioning from the wheelchair this year. The complainant reported that this is because she has not experienced a break in services (Review of the audio recording of the IEP team meeting).
25. When the complainant asked the therapists what they thought would happen if the therapies were not continued throughout the year, the public agency representative did not permit them to respond, stating that the question was not "germane to the discussion." The public agency representative then decided that there was no data to indicate that the student would experience regression of breakthrough skills without the provision of ESY services and the team documented its decision that the BCPS and school-based staff "do not feel that [the student's] 12-month educational program will be significantly jeopardized if ESY is not provided" (Docs. d, e, and review of the audio recording of the IEP team meeting).
26. No documentation was provided that proper procedures have been followed in other cases when determining whether services are medical or whether they constitute special education and related services in response to the MSDE request for such documentation.

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27. No documentation was provided that ESY services address functional skills goals where there is no need to address academic skills in response to the MSDE's request for such documentation.
28. No documentation was provided that the BCPS considers ESY services beyond the summer break in response to the MSDE's request for such documentation.

DISCUSSION/CONCLUSIONS:

In order to provide a student with a Free Appropriate Public Education (FAPE), the public agency must ensure that an IEP is developed that addresses all of the needs that arise out of the student's disability that are identified in the evaluation data. In developing each student's IEP, the public agency must ensure that it includes a statement of the student's present levels of performance, including how the disability affects the student's progress in the general curriculum. The IEP must also include academic and functional goals designed to meet the needs that arise out of the student's disability, and the special education instruction and related services required to assist the student in achieving the goals [Emphasis added] (34 CFR §§300.101 and .320).

The United States Supreme Court has established a three prong test in determining whether a service constitutes a medical service or whether it constitutes special education and related services for which a public agency is responsible to provide. First, the student must be identified as a student with a disability under the IDEA. Second, the service must be needed to assist the student to benefit from special education. If the service could be given during non-school hours, the public agency is not required to provide the service. Third, it must not require the services of a physician. If the services can be provided by a nurse or other qualified professional, it is considered school health services, which the public agency is required to be provide if determined necessary of the IEP team (*Irving Independent School District v. Tatro*, 104 S.Ct. 3371 [1984] and *Letter to Greer*, OSEP, 19 IDELR 348, July 14, 1992).

Extended School Year (ESY) services are the individualized extension of specific special education and related services that are provided to a student beyond the normal school year of the public agency. When determining whether ESY services are required for the provision of FAPE, the IEP team must consider all of the factors below.

1. Whether the student's IEP includes annual goals related to critical life skills;
2. Whether there is a likelihood of substantial regression of critical life skills caused by the normal school break and a failure to recover those lost skills in a reasonable time;
3. The student's degree of progress toward mastery of the annual IEP goals related to critical life skills;
4. The presence of emerging skills or breakthrough opportunities;
5. Interfering behaviors;

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6. The nature and severity of the disability; and
7. Special circumstances (34 CFR §300.106 and COMAR 13A.05.01.08).

After considering the required factors, the IEP team must decide whether the benefits that a student receives from the education program during the regular school year will be significantly jeopardized if the student is not provided with ESY services [Emphasis added] (*MM v. School District of Greenville Co. (S.C.)*, 303 F3d. 523, 37 IDELR 183 (4th Cir. 2002).

At least annually, each public agency must ensure that the IEP team determines whether a student requires ESY services in order to receive a FAPE. In implementing the requirements, the public agency may not limit the type, amount, or duration of the services (34 CFR §300.106 and COMAR 13A.05.01.03).

The United States Department of Education, Office of Special Education Programs (OSEP) has explained that, typically, ESY services are provided during the summer months. However, there is nothing in the regulations that limit ESY services to the summer. If the IEP team determines that a student requires ESY services such as before and after regular school hours or during school vacations in order to receive a FAPE, those services must be provided (Analysis of Comments and Changes to the IDEA, *Federal Register*, Vol. 71, No. 156, August 14, 2006, p. 46582).

The Courts have held that limiting the education programs of students with disabilities to 180 days or nine months per year is impermissible. If a student requires more than 180 days or nine months of special education services in order to receive a FAPE, the public agency may not limit the school year or consideration of the need for extended school year programming to this time period (*Yaris v. Special School District of St. Louis County, et al.*, 728 F.2d 1055 [1984] and *Battle v. Commonwealth of Pennsylvania, et al.*, 629 F.2nd 269 [1980]).

Based on the Findings of Facts #14 and #26, the MSDE finds that the BCPS does not follow proper procedures when determining whether services are medical or whether they are related services when provided in a hospital setting. Therefore, this office finds that the IEP team did not follow proper procedures when determining that there were breaks in services to the student and that there was no regression during breaks in services.

Based on the Findings of Facts #1 - #7, #9 - #15, #18, and #20 - #24, the MSDE finds that proper procedures were not followed when making the ESY determination for the named student because there was either no data to support the following IEP team's decisions or the decisions were inconsistent with the data:

- a. That the student achieved many of the annual IEP goals despite the hospitalizations that she experienced;

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- b. That the IEP team was unaware of the reason for the student's hospitalizations and no information that the student is medically fragile;
- c. That there was no connection between the length of hospitalizations and the provision of therapies;
- d. That a request for educational services during breaks in the school year was similar to requesting that services be provided on weekend and evenings during the regular school year;
- e. That no special circumstances exist;
- f. That there were no emerging or breakthrough skills; and
- g. That there were breaks in services during the school year.

Based on the Findings of Facts #16, #17, and #28, the MSDE finds that the BCPS limits the consideration of ESY services to students who participate in 10 month educational programs and experience a break in services during the summer months. Therefore, this office finds that a violation occurred with respect to the student and similarly-situated students who receive educational services beyond the regular 10 month program.

Based on the Findings of Facts #8 and #27, the MSDE also finds that the BCPS limits the consideration of ESY services to those designed to address academic goals and not functional skills goals. Therefore, this office finds that a violation occurred with respect to the student and similarly-situated students who have goals for which related services are provided.

Based on the Findings of Facts #9 and #19 - #22, the MSDE finds that, while the IEP team eventually considered all of the required factors, there is evidence that the public agency representative made the decision about the need for ESY services prior to the team's consideration of all of the factors. Therefore, this office finds that violations occurred.

Additional Discussion/Conclusion – Parent Participation

The public agency must take steps to ensure that a parent is afforded the opportunity to participate in each IEP team meeting (34 CFR §300.322). Therefore, in developing the IEP, the IEP team must consider the concerns of the parents for enhancing the education of the student (34 CFR §300.324.) If the parent shares an independent evaluation obtained at private expense, the IEP team must consider the results of the evaluation (34 CFR §300.502).

It is well established that the failure to provide for meaningful participation by parents in the IEP team meeting may result in a denial of a FAPE (*Deal v. Hamilton County Bd. of Educ.*, 42 IDELR 109 [6th Cir. 2004], *A.K. v. Alexandria City School Board*, 484 F.3d 672,

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April 26, 2007). Parental participation means more than having an opportunity to speak. The school system is not to simply accede to parents' demands without considering suitable alternatives. However, it must show that it came to the meeting with an open mind and must be receptive and responsive to parents' positions at all stages, and answer parents' questions (*Blackmon v. Springfield R-XII Sch. Dist.*, 31 IDELR 132 [8th Cir. 1999], *Bd. of Educ. of Waterford-Halfmoon Union Free Sch. Dist.*, 20 IDELR 1092 [SEA NY 1994], and *R.L. and S.L. v. Miami-Dade County Sch. Bd.*, 63 IDELR 182 [11th Cir. 2014]).

Based on the Findings of Facts #13, #15, #20, and #25, the MSDE finds that the BCPS did not ensure that the information provided by the complainant and the student's private physicians was considered by the IEP team. This, in addition to the public agency representative making the ESY decision before considering all of the required factors, demonstrates that the ESY decision was predetermined and that the complainant was not provided with the opportunity for meaningful participation in the decision making. As a result of all of the above, this office finds that violations occurred and that the student was denied a FAPE.

CORRECTIVE ACTIONS/TIMELINES:

Student Specific

The MSDE requires the BCPS to provide documentation by August 1, 2017 that the named student will be offered services to address all of the IEP goals during all breaks in her school program through the summer of 2018 to remediate the loss of a FAPE.

System-Based

The MSDE further requires the following:

1. By August 1, 2017, the BCPS must provide documentation to the MSDE that all parents of students with disabilities are notified in writing of the right to request reimbursement for all services privately obtained during the summer of 2017 that are designed to assist the students with the IEP goals. The notice must include information that upon receipt of such a request and documentation of private payment of the services, either the parent will be reimbursed or an IEP team will be convened by December 1, 2017 to determine whether the services obtained were designed to assist the student with the IEP goals. The BCPS must provide the MSDE with documentation by February 1, 2018 of all requests received, and either the documentation of the agreement to pay for those services or the IEP team's determination that the services were not designed to address the IEP goals.
2. By April 1, 2018, the BCPS must provide documentation to the MSDE that all IEP team chairpersons have received updated training on the requirements for making ESY determinations to ensure that the violations identified through this investigation do not recur.

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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 by contacting Ms. Bonnie Preis, Compliance Consultant, Family Support and Dispute Resolution Branch, MSDE at (410) 767-7770.

Please be advised that the BCPS and the complainant have the right to submit additional written documentation to this office within fifteen (15) days of the date of this letter if they disagree with the findings of fact 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 within the timelines reported in this Letter of Findings.

Questions regarding the findings, conclusions and corrective actions contained in this letter should be addressed to this office in writing. The student's parents and the school system maintain the right to request mediation or to file a due process complaint, if they disagree with the identification, evaluation, placement, or provision of a FAPE for the student, including issues subject to this State 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:am

c: Sonja Brookins Santelises Alma McPherson
 Darnell L. Henderson Anita Mandis
 Dori Wilson Bonnie Preis