

February 13, 2025

Ms. Jaime Seaton  
BGS Law, LLC  
110 N. Washington Street  
Suite 404  
Rockville, Maryland 20850

Dr. Richard Jeffries  
Director of Special Education  
Howard County Public School System  
10910 Clarksville Pike  
Ellicott City, Maryland 21042

RE: [REDACTED]  
Reference: #25-194

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 on the final results of the investigation.

**ALLEGATIONS:**

On December 23, 2024, MSDE received a complaint from Ms. Jaime Seaton, hereafter, “the complainant,” on behalf of the above-referenced student. In that correspondence, the complainant alleged that the Howard County Public School System (HCPSS) violated certain provisions of the Individuals with Disabilities Education Act (IDEA) concerning the above-referenced student.

MSDE investigated the following allegations:

1. The HCPSS did not ensure that the student was provided with the supplementary aids, services, and accommodations as required by the Individualized Education Program (IEP) during ESY 2024, in accordance with 34 CFR §§ 300.101 and .323.
2. The HCPSS has not ensured that the IEP contains appropriate measurable goals since December 2023, in accordance with 34 CFR § 300.320.
3. The HCPSS did not follow proper procedures in making the determination that the student would participate in the alternate Maryland School Assessment Program and would pursue a Certificate of Program Completion instead of a high school diploma, since December 2023, in accordance with 34 CFR § 300.320 and COMAR 13A.03.02.09.

4. The HCPSS did not follow proper procedures when determining the amount and nature of special education services required while the student was approved for Home and Hospital Services (HHS), from October 24, 2024, through November 25, 2024, in accordance with COMAR13A.05.01.10C(5)(a) & (b).
5. The HCPSS has not ensured that the IEP team addressed the parent's concerns regarding the provision of accommodations during ESY 2024, appropriateness of IEP goals, determining that the student would participate in the alternative Maryland School Assessment Program and would pursue a Certificate of Program Completion instead of a high school diploma, and consideration of a private physician's letter, since December 2023, in accordance with 34 CFR § 300.324.

### **BACKGROUND:**

The student is 17 years old and is identified as a student with autism under the IDEA. He attends [REDACTED] School and has an IEP that requires the provision of special education instruction and related services.

### **FINDINGS OF FACT:**

1. On January 2, 2024, the IEP team convened as a continuation of a previous meeting. The IEP Team Meeting Report generated after the meeting reflects that the IEP team discussed the student's goals and objectives and responded to the parents and advocate questions. It further reflected that the IEP team discussed the Least Restrictive Environment (LRE), including the continuum of placement.  
  
"The school team proposed that the student be instructed on the alternative educational standards, the parents have denied consent for this. The school team expressed concerns regarding the negative impact this will have on [the student's] progress on his IEP as well as progress within the general education setting."
2. On February 8, 2024, the IEP team convened for an interim review and to address parental concerns. The IEP Team Meeting Report generated after the meeting reflects that the IEP team discussed the student's goals, and that the "parents do not consent to the IEP team recommendation for alternative curriculum and assessments for [the student]."
3. On March 6, 2024, the IEP team convened for an interim review and to address parental concerns. The IEP Team Meeting Report generated after the meeting reflects that the IEP team discussed and addressed parental concerns regarding the IEP goals, objectives, supplementary aids, services, and accommodations.
4. The IEP developed on April 18, 2024, reflects that the student will exit with a Maryland High School diploma with "successful completion of a State-approved career and technical education program." The IEP reflects a completed Appendix A (guidance for the IEP team, participation decision for the alternative assessments and instruction using alternate standards document). Additionally, on December 12, 2023, the parents did not agree to the student participating in an alternative assessment, however, the IEP team determined that the student will be instructed using alternate standards, which, if continued, will result in the student not earning credits towards a Maryland High School Diploma.

The IEP required a LRE of inside the general education classroom between 40-79% of the school day;

- 19 hours and 23 minutes weekly inside the general education classroom; and
- 14 hours and 22 minutes weekly outside the general education classroom.

The IEP required goals:

- Transition: Post Secondary Goals:
  - Employment: "After exiting school and with support from the DDA [Developmental Disabilities Administration], [the student] will participate in community learning services to develop the skills and social supports necessary to gain employment;"
    - Related goal: "Self-Management/Behavior: By December 2024, [the student] will demonstrate the skills needed to become more independent in the school environment and manage expected behaviors with 80% accuracy on 4 out of 5 occasions with minimal prompts;"
  - Education:
    - Related goal: "Study/Organizational Skills: By December 2024, [the student] will develop the skills necessary (utilizing environmental signs, providing pertinent personal information, and answering posed questions) to gain more independence with 75% accuracy on 4 out of 5 occasions with minimal prompts;"
  - Independent living: "Upon exit, [the student] will use time and self-management skills, walk to and from destinations independently, and respond appropriately to safety, health, and self-protection needs;"
    - Related goal: "Goals: Study/Organizational Skills: By June 2025, [the student] will develop the skills necessary to gain more independence with his independent community living skills with 75% accuracy on 4 out of 5 occasions with minimal prompts;"
- Written language: "By December 2024, when given an instructional level writing prompt, sentence starters and/or visual prompts, [the student] will produce a paragraph with (3-4) sentences, capitalization, and ending punctuation on 4 out of 5 occasions with moderate adult prompts;"
  - Method of measurement: teacher report, work samples, classroom-based assessments, Occupational Therapy (OT) data;
  - Criteria (mastery and retention): three out of five occasions; minimal: 1-2 prompts; moderate: 3-4 prompts; maximum: 5+ prompts;
- Self-management behavior: "By December 2024, [the student] will demonstrate the skills needed to become more independent in the school environment and manage expected behaviors with 80% accuracy on 4 out of 5 occasions with minimal prompts;"
  - Method of measurement: teacher report and observational record;
  - Criteria (mastery and retention): 80% accuracy on four out of five occasions with minimal supports; minimal: 1-2 prompts; moderate: 3-4 prompts; maximum: 5+ prompts;
- Reading comprehension: "Given passage on his instructional level, [the student] will recall details and/or examples from the given text to answer specific comprehension questions with 80% accuracy on 3 out of 4 occasions with minimal prompting;"
  - Method of measurement: teacher report, work samples, classroom-based assessments;

- Criteria (mastery and retention): 80% accuracy on four out of five trials with minimal prompting; minimal: 1-2 prompts; moderate: 3-4 prompts; maximum: 5+ prompts;
- Math: “By December 2024, given math problems and physical manipulatives (when appropriate), [the student] will make sense of given problems and persevere in solving them with 80% accuracy with minimal prompting on four of five occasions;”
  - Method of measurement: teacher report, work samples, classroom-based assessments;
  - Criteria (mastery and retention): 80% accuracy on four out of five trials with minimal prompting; minimal: 1-2 prompts; moderate: 3-4 prompts; maximum: 5+ prompts;
- Study/organizational skills goal one: “By December 2024, [the student] will increase his study/organizational skills by initiating and persevering with classroom activities to submit work timely on 4 out of 5 occasions;”
  - Method of measurement: teacher report, work samples, observational record;
  - Criteria (mastery and retention): three out of five trials; minimal prompting; minimal: 1-2 prompts; moderate: 3-4 prompts; maximum: 5+ prompts;
- Social interaction skills: “Given up to 2 verbal or visual prompts, [the student] will increase positive peer interactions by distinguishing between expected and unexpected communication and social behaviors for a variety of situations;”
  - Method of measurement: observational record;
  - Criteria (mastery and retention): 75% accuracy over two of three sessions;
- Communication: “Given choices and visual supports as needed, [the student] will relay information related to people, times, places, and other details;”
  - Method of measurement: observational record;
  - Criteria (mastery and retention): 75% accuracy over two of three sessions; and
- Study/organizational skills goal two: “By December 2024, [the student] will develop the skills necessary (utilizing environmental signs, providing pertinent personal information and answering posed questions) to gain more independence with 75% accuracy on 4 out of 5 occasions with minimal prompts;”
  - Method of measurement: teacher report and observation record; and
  - Criteria (mastery and retention): 75% accuracy on four out of five occasions with minimal prompts; minimal prompting; minimal: 1-2 prompts; moderate: 3-4 prompts; maximum: 5+ prompts.

There is documentation that the parents did not consent to this IEP.

5. On May 20, 2024, the HCPSS sent the parents a letter in response to the April 18, 2024, prior written notice. The letter reflects:
  - The HCPSS has been providing the student with comparable IEP services since September 2023, upon the student’s enrollment in the HCPSS;
  - On December 11, 2023, and January 2, 2024, the HCPSS made an offer of free appropriate public education (FAPE) when HCPSS provided the parent with an authorization form, that would allow the HCPSS to implement the student’s initial IEP, the parents did not provide consent;
  - On February 8, 2024, March 6, 2024, and April 18, 2024, IEP team meetings were held to address the parents’ concerns and to further develop the IEP;
  - On April 18, 2024, the HCPSS requested the parents provide consent to the IEP by May 17, 2024. On May 17, 2024, the parents had not provided consent to the IEP. Resulting in the student no longer being considered a special education student being served under the IDEA; and

- On May 18, 2024, the parents requested an IEP team meeting to address their concerns with the IEP. An IEP team meeting was scheduled for May 22, 2024, however, the HCPSS did not convene the meeting to consider HHS and ESY, because HHS determination was now considered a general education function, and ESY is a special education service not offered to general education students. In addition, the HCPSS indicated that they would not hold the meeting to address the April 18, 2024, IEP since the IEP was collaboratively developed with the parents since December 11, 2023, and parental concerns were considered and addressed at multiple IEP team meetings.
6. On June 24, 2024, the IEP team convened to conduct interim review to address parental concerns. The IEP Team Meeting Report generated after the meeting reflects that the complainant and parents brought up concerns regarding ESY 2024, IEP goals, least restrictive placement (LRE), and that the family is obtaining a private evaluation. It is reflected that the IEP team referenced data from a previously provided private evaluation and addressed the complainant's and the parents' concerns.

The IEP Team Meeting Report further reflects that "comprehensive summer school is optional and d family signs up for it,- [the student] would not receive specially designed instruction in summer school... comprehensive summer school does not offer additional adult support and there are special ed staff there so [the student] could be supported entering the building and navigating to class, the restroom, and lunch."

7. The student's IEP in effect during ESY 2024, was developed on June 24, 2024. The IEP reflects that the student will exit with a Maryland high school diploma with "successful completion of a State-approved career and technical education program." The IEP reflects a completed Appendix A (guidance for the IEP team, participation decision for the alternative assessments and instruction using alternate standards document). It is further reflected that on December 12, 2023, the parents did not agree to the student participating in an alternative assessment, however, the IEP team has determined that the student will be instructed using alternate standards, which, if continued, will result in the student not earning credits towards a Maryland High School Diploma.

The IEP requires a LRE of inside the general education classroom between 40-79% of the school day;

- 19 hours and 23 minutes weekly inside the general education classroom; and
- 14 hours and 22 minutes weekly outside the general education classroom.

The IEP requires supplementary aids, services, and accommodations:

- Notes and outlines;
- Assistive technology (AT);
- Calculation device for mathematics and non-mathematics sections;
- Extended time (2x);
- AT consult, as requested;
- Occupation therapy consult, quarterly;
- Staff training, periodically;
- Daily
  - Give time to respond;
  - Provide student with models of task;
  - Check for understanding;

- Assistive technology: word processor with cloud-based storage, grammar/spell check, and access to a PDF annotator, digital copy of teacher notes before/after class;
- Modified paper
- Simplified language;
- Visual timer during classwork;
- Visual schedule;
- Processing time;
- Independent work;
- Eye contact/proximity control;
- Advance preparation for schedule changes;
- Use of positive/concrete reinforcers
- Visually supported social stories and social scripts;
- Cue for “whole body listening”;
- Close adult support during transition/instruction;
- Verbal prompts go to the nurse to take medication;
- Preferential seating; and
- Modified lock for locker.
- As needed
  - Visual checklist
  - Note taking assistance after an attempt has been made;
  - Study guides to support with previewing academic content;
  - Graph paper;
  - Reinforce positive behavior through non-verbal/verbal communication; and
  - Provide access to fidgets.
- When appropriate
  - Multiple choice with a reduced selection of answers;
  - Reduced quantity of work to demonstrate mastery of all skills; and
  - Prompt to turn in assignments.

The IEP requires goals:

- Transition: Post Secondary Goals:
  - Employment: “After exiting school and with support from the DDA [Developmental Disabilities Administration], [the student] will participate in community learning services to develop the skills and social supports necessary to gain employment;”
    - Related goal: “Self-Management/Behavior: By June 2025, [the student] will demonstrate the skills needed to become more independent in the school environment and manage expected behaviors with 80% accuracy on 4 out of 5 occasions with minimal prompts;”
  - Education:
    - Related goal: “Study/Organizational Skills: By June 2025, [the student] will develop the skills necessary (utilizing environmental signs, providing pertinent personal information, and answering posed questions) to gain more independence with 75% accuracy on 4 out of 5 occasions with minimal prompts;”

- Independent living: “Upon exit, [the student] will use time and self-management skills, walk to and from destinations independently, and respond appropriately to safety, health, and self-protection needs;
  - Related goal: “Goals: Study/Organizational Skills: By June 2025, [the student] will develop the skills necessary (utilizing environmental signs, providing pertinent personal information, and answering posed questions) to gain more independence with 75% accuracy on 4 out of 5 occasions with minimal prompts;”
- Written language: “By June 2025, when given an instructional level writing prompt, sentence starters and/or visual prompts, [the student] will produce a paragraph with (3-4) sentences, capitalization, and ending punctuation on 4 out of 5 occasions with moderate adult prompts;”
  - Method of measurement: teacher report, work samples, classroom-based assessments, Occupational Therapy (OT) data;
  - Criteria (mastery and retention): three out of five occasions; minimal: 1-2 prompts; moderate: 3-4 prompts; maximum: 5+ prompts;
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  - Method of measurement: teacher report and observational record;
  - Criteria (mastery and retention): 80% accuracy on four out of five occasions with minimal supports; minimal: 1-2 prompts; moderate: 3-4 prompts; maximum: 5+ prompts;
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  - Method of measurement: teacher report, work samples, classroom-based assessments;
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- Study/organizational skills goal one: “By June 2025, [the student] will increase his study/organizational skills by initiating and persevering with classroom activities to submit work timely on 4 out of 5 occasions;”
  - Method of measurement: teacher report, work samples, classroom-based assessments;
  - Criteria (mastery and retention): three out of five trials; minimal prompting; minimal: 1-2 prompts; moderate: 3-4 prompts; maximum: 5+ prompts;
- Social interaction skills: “Given up to 2 verbal or visual prompts, [the student] will increase positive peer interactions by distinguishing between expected and unexpected communication and social behaviors for a variety of situations;”
  - Method of measurement: observational record;
  - Criteria (mastery and retention): 75% accuracy over two of three sessions;

- Communication: “Given choices and visual supports as needed, [the student] will relay information related to people, times, places, and other details;”
  - Method of measurement: observational record;
  - Criteria (mastery and retention): 75% accuracy over two of three sessions; and
- Study/organizational skills goal two: “By June 2025, [the student] will develop the skills necessary (utilizing environmental signs, providing pertinent personal information and answering posed questions) to gain more independence with 75% accuracy on 4 out of 5 occasions with minimal prompts;”
  - Method of measurement: teacher report and observation record; and
  - Criteria (mastery and retention): 75% accuracy on four out of five occasions with minimal prompts; minimal prompting; minimal: 1-2 prompts; moderate: 3-4 prompts; maximum: 5+ prompts.

The IEP reflects the student is eligible for ESY.

On June 24, 2024, the parents consented to the implementation of the IEP.

8. There is documentation that the parents registered, and the student attended the Algebra I credit completion program as part of the comprehensive summer school. There is documentation that the HCPSS provided the student with supplementary aids and accommodations including close adult support during transition/instruction.

There is documentation that the credit completion program as part of the comprehensive summer school is a general education program.

There is documentation that the student did not attend ESY 2024.

9. On October 21, 2024, the parents requested HHS paperwork from HCPSS. On October 24, 2024, the student was placed on HHS for an emotional condition.
10. On October 29, 2024, a private physician emailed the HCPSS. The email reflects that the student was “recently diagnosed with Autistic Disorder.” The email further reflects that the private physician recommended that the student participate in the HHS program. On October 30, 2024, the HCPSS spoke with the parents regarding the private physician's email.
11. There is documentation that IEP team meetings were scheduled for November 7, 13, and 18, 2024, and that they were canceled at the parents’ request.
12. On November 25, 2024, the IEP team convened to consider HHS and amend the student’s IEP. The IEP Team Meeting Notice generated following the meeting reflects that the HHS 30-day review was completed and that the school-based team shared that the student has been receiving less service time than the IEP required for four weeks. Therefore, the HCPSS offered the student 13 hours of compensatory services as a remedy.



13. The student's IEP developed on June 24, 2024, was amended on November 25, 2024. The IEP reflects that the IEP school-based team proposed that the student would receive seven hours and 45 minutes of instruction while on HHS. The student would receive two hours of instruction per content area, weekly. This is a total of 6 hours weekly for content area support, with an additional one hour and 45 minutes of special education support to work on specified HHS goals and objectives. This was an increase to the previously determined four hours and thirty minutes of instruction in HHS for algebra, English, and social studies.

The IEP requires one hour and 45 minutes weekly of instruction while receiving HHS from October 21, 2024, through December 27, 2024.

14. There is documentation that the student's 60<sup>th</sup> consecutive school day on HHS will be February 6, 2025.

### **DISCUSSIONS AND CONCLUSIONS:**

#### **Allegation #1 Provision of Supplementary Aids, Services, and Accommodations**

In this case, the student did not attend ESY 2024, instead the student attended the Algebra I credit completion program as part of the comprehensive summer school. There is documentation that the HCPSS provided the student with supplementary aids and accommodations including close adult support during transition/instruction while attending the credit completion program.

Based on Findings of Fact #6, #7, and #8, MSDE finds that the HCPSS was not required to ensure that the student was provided with the supplementary aids, services, and accommodations as required by the IEP during ESY 2024, because the student did not attend ESY 2024, in accordance with 34 CFR §§ 300.101 and .323. Therefore, MSDE does not find a violation.

#### **Allegation #2 Measurable IEP Goals**

The public agency must ensure that the IEP contains measurable annual goals, including academic and functional goals designed to meet the child's needs resulting from the child's disability. These goals should enable the child to be involved in and make progress in the general education curriculum and meet each of the child's other educational needs resulting from the child's disability (34 CFR § 300.320).

Based on Findings of Fact #4 and #7, MSDE finds that the HCPSS has ensured that the IEP contains appropriate measurable goals since December 2023, in accordance with 34 CFR § 300.320. Therefore, MSDE does not find a violation.

#### **Allegation #3 Proper Procedures in Determining that the Student Would Participate in the Alternate Maryland School Assessment Program**

In this case, the school-based IEP team completed the Appendix A document and determined the student eligible to participate in the alternate Maryland School Assessment Program and would pursue a Certificate of Program Completion instead of a high school diploma. The parents disagreed with the determination. The IEP team documented the parents' disagreement in the student's file as required, and continued to identify the student as a student who will exit with a Maryland High School diploma.

The student's IEP reflects that they will exit with a Maryland High School diploma with "successful completion of a State-approved career and technical education program.

Based on Findings of Fact #1, #2, #4 and #7, MSDE finds that the HCPSS did follow proper procedures in making the determination that the student would participate in the alternate Maryland School Assessment Program and would pursue a Certificate of Program Completion instead of a high school diploma, since December 2023, in accordance with 34 CFR § 300.320 and COMAR 13A.03.02.09. Therefore, MSDE does not find a violation.

#### **Allegation #4                      Proper Procedures in Determining HHS Services**

If a student with a disability is unable to participate in the student's school of enrollment and is provided instruction at home because of a physical or an emotional condition, the IEP team must review and revise the student's IEP and determine the instructional services to be provided to the student as long as the medical restrictions apply and develop a plan for returning the student to a school-based program (COMAR 13A.05.01.10(C)(5)).

The IEP team should convene as soon as possible to avoid a disruption in the provision of special education and related services to the student. According to the HHS regulation, HHS is required to begin no later than 10 school days following the local school system's receipt of: 1) notification that the student is unable to attend school, and 2) verification of the need for services. Once the local school system has received both requirements, the IEP team should be prepared to meet within 10 school days as well, so that HHS can begin timely and in accordance with the student's IEP. If the IEP team cannot meet within 10 school days, HHS may still begin so that the student has access to instruction. The IEP team should meet as soon as possible, however, because failure to implement a student's IEP as written raises concerns about the delivery of a FAPE. (COMAR 13A.03.05.03D(4)).

In this case, the student was determined eligible for HHS on October 24, 2024. The student's IEP was amended to reflect HHS on November 25, 2024. On November 25, 2024, the HCPSS acknowledged that they had not provided the required HHS services and offered 13 hours of compensatory services as a remedy.

Based on Findings of Fact #9 through #13, MSDE finds that the HCPSS did not follow proper procedures when determining the amount and nature of special education services required while the student was approved for HHS from October 24, 2024, through November 25, 2024, in accordance with COMAR13A.05.01.10C(5)(a) & (b). Therefore, MSDE finds a violation.

Notwithstanding the violation, based on Finding of Fact #12, MSDE finds that on November 25, 2024, the HCPSS determined the amount of compensatory services to be provided for the missed HHS services. Therefore, no further student-specific corrective action is required.

## **Allegation #5                      Addressing Parents Concerns**

Based on the Findings of Fact #2, #3, #6, and #10, MSDE finds that the HCPSS has ensured that the IEP team addressed the parent's concerns regarding the provision of accommodations during ESY 2024, appropriateness of IEP goals, determining that the student would participate in the in the alternative Maryland School Assessment Program and would pursue a Certificate of Program Completion instead of a high school diploma, and consideration of a private physician's letter, since December 2023, in accordance with 34 CFR § 300.324. Therefore, MSDE does not find a violation.

### **TIMELINES:**

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 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. The written request for reconsideration should be provided to Tracy Givens, Section Chief, Dispute Resolution via email at [Tracy.Givens@maryland.gov](mailto:Tracy.Givens@maryland.gov). Pending this office's decision on a request for reconsideration, the public agency must implement any corrective actions within the timelines reported in this Letter of Findings.

The parties 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. MSDE recommends that this Letter of Findings be included with any request for mediation or a due process complaint.

Sincerely,

Antoine L. Hickman, Ed.D.  
Assistant State Superintendent  
Division of Early Intervention and Special Education Services

ALH/sd

c:        William Barnes, Superintendent, HCPSS  
          Janice Yetter, Director of Special Education, Secondary Schools, HCPSS  
          Kelly Russo, Coordinator of Special Education Compliance and Dispute Resolution, HCPSS  
          ██████████, Principal, ██████████, HCPSS  
          Dr. Brian Morrison, Branch Chief, Policy and Accountability, MSDE  
          Dr. Paige Bradford, Section Chief, Performance Support and Technical Assistance, MSDE  
          Alison Barmat, Branch Chief, Family Support and Dispute Resolution, MSDE  
          Nicole Green, Compliance Specialist, MSDE  
          Tracy Givens, Section Chief, Dispute Resolution, MSDE  
          Sarah Denney, Complaint Investigator, Dispute Resolution, MSDE