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State Superintendent of Schools

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June 21, 2016

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District 01 – Baltimore City
Juvenile Protection Division
217 East Redwood Street, Suite 1000
Baltimore, Maryland 21202

Ms. S. Beth Hart
Director, Juvenile Services Education
Maryland State Department of Education
200 West Baltimore Street
Baltimore, Maryland 21201

RE: XXXXX
Reference: #16-110

Dear Parties:

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

ALLEGATIONS:

On April 20, 2016, the MSDE received a complaint from Grace Reusing, Esq., Office of the Public Defender, hereafter “the complainant,” on behalf of the above-referenced student. In that correspondence, the complainant alleged that the Maryland State Department of Education Juvenile Services Education (JSE) violated certain provisions of the Individuals with Disabilities Education Act (IDEA) with respect to the above-referenced student.

The MSDE investigated the following allegations:

1. The JSE did not ensure that the student was provided with the special education instruction by a special education teacher and the amount of related services required by the Individualized Education Program (IEP) while he was placed by the Maryland Department of Juvenile Services (DJS) at the XXXXXXXXXXXXXXXXXXXXXXXXXX (XXX) from August, 2015 to September, 2015, in accordance with 34 CFR §§300.101 and .323.
2. The JSE did not ensure that the student's educational record was maintained while he was placed by the DJS at the XXXX from August, 2015 to September, 2015, in accordance with COMAR 13A.05.11.09 and 13A.08.02.
3. The JSE did not ensure that the student was provided with the special education instruction by a special education teacher and the amount of related services required by the IEP while he was placed by the DJS at the XXXXXXXXXXXXXXXXXX (XXX) from September, 2015 to March, 2016, in accordance with 34 CFR §§300.101 and .323.
4. The JSE did not ensure that the revisions made to the IEP were made either by the IEP team or by agreement of the parent while the student was placed by the DJS at the XXX from September, 2015 to March, 2016, in accordance with 34 CFR §300.324.
5. The JSE did not ensure that the student's social, emotional, and behavioral needs were addressed while he was placed by the DJS at the XXXX from September, 2015 to March, 2016, in accordance with 34 CFR §300.324.
6. The JSE did not ensure that the student was provided with the opportunity to earn service-learning hour credits necessary to progress towards the standards for graduation while he was placed by the DJS at the XXXX from September, 2015 to March, 2016, in accordance with COMAR 13A.03.02.05. and 13A.05.11.03.
7. The JSE did not ensure that the student was provided with special education instruction by teachers who hold a valid Maryland certification in the areas of instruction at the XXX from September, 2015 to March, 2016, in accordance with 34 CFR §§300.2, .18, .101, .156, .323, and COMAR 13A.05.11.07 and 13A.12.01.01.

INVESTIGATIVE PROCEDURES:

1. On April 22, 2016, the MSDE sent correspondence to the complainant that acknowledged receipt of the correspondence containing allegations of violations of the IDEA and identified the allegations subject to this investigation. On the same date, the MSDE notified the JSE of the allegations and requested that JSE review the alleged violations.

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2. On May 3, 2016, Ms. Anita Mandis, Section Chief, Complaint Investigation Section, MSDE, requested documents from the JSE.
3. On May 4 and 27, 2016, Ms. Mandis met with Ms. Dawn Hubbard, Compliance Specialist, JSE, to review documents and discuss the allegations.
4. On June 17, 2016, Ms. Mandis requested documents from the JSE, which were provided on June 21, 2016.
5. The MSDE reviewed documentation, relevant to the findings and conclusions referenced in this Letter of Findings, which includes:
 - a. IEP, dated April 3, 2013;
 - b. IEP developed in XXXXXXXXXX (XXX IEP), dated April 3, 2015;
 - c. JSE IEP, dated April 3, 2015;
 - d. Request for Records, dated August 7, 2015;
 - e. Invitation to an September 4, 2015 IEP team meeting, dated August 13, 2015;
 - f. Excerpts from the XXXXX communication log for August, 2015;
 - g. Request for Records, dated August 17 and 18, 2015 and electronic mail correspondence from the XXXXX staff to the DJS staff, dated August 18, 2015;
 - h. Electronic mail message among the JSE staff, dated August 19, 2015;
 - i. Written summary of the September 4, 2015 IEP team meeting;
 - j. Progress reports, dated September 25, 2015 and October 23, 2015;
 - k. Report of the student's progress towards achievement of the annual IEP goals, dated November 20, 2015;
 - l. Electronic mail messages between the XXXX and the JSE, dated February 10 and 25, 2016;
 - m. Correspondence alleging violations of the IDEA, received by the MSDE on April 20, 2016;
 - n. Maryland State Department of Juvenile Services Placement Summary;
 - o. The *JSE Special Education Policies and Procedures*; and
 - p. Student Record Card 3 (SR 3).

BACKGROUND:

The student is eighteen (18) 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 instruction and related services (Docs. c and i).

During the time period covered by this investigation, the student has had the following residential and educational placements:

- From August 4, 2015 to September 2, 2015, the Maryland Department of Juvenile Services (DJS) placed the student at the XXXXX. On August 11, 2015, the student was enrolled in the JSE program at the XXXX.
- From September 2, 2015 to March 7, 2016, the DJS placed the student at the XXX, where he was enrolled in the JSE program.
- On March 7, 2016, the student returned to the community, and there is no documentation that he is enrolled in an educational program (Doc. n and review of the XXXXX staff notes).

**ALLEGATIONS #1 - #5 DEVELOPMENT AND IMPLEMENTATION OF THE IEP
AND MAINTENANCE OF THE EDUCATIONAL RECORD**

FINDINGS OF FACTS:

1. The DJS Education Profile for the student reflects that, prior to being placed by the DJS at the XXX on August 4, 2015, the student was enrolled in the Baltimore City Public Schools (BCPS) (Review of the DJS Education Profile).
2. On Friday, August 7, 2015, the XXXX staff requested the student's educational record from the BCPS in preparation for his enrollment in the JSE program. On Tuesday, August 11, 2015, the student was enrolled in the JSE program at the XXXX. At that time, the XXX staff decided to implement an April 3, 2013 IEP that was developed during the student's previous placement at that facility while awaiting receipt of the student's educational record. Also at that time, an IEP team meeting was scheduled for September 4, 2015 (Docs. a, d, f, and review of notes of the BCJJC staff).
3. The April 3, 2013 IEP required the provision of special education instruction in the general education classroom, primarily by a general education teacher, and weekly psychological services. The special education and related services were intended to assist the student with achieving annual goals to improve reading comprehension, math calculation and problem solving, written language expression, and attention to tasks (Doc. a).
4. On August 11, 2015, the XXXX staff received a transcript for the student from the BCPS indicating that the student had earned no credits during the 2014-2015 school year (Review of BCPS transcript).
5. On August 17 and 18, 2015, the XXXX staff made requests for the student's educational record from the DJS (Doc. g).

6. On August 19, 2015, the student informed the XXXX staff that an IEP had been developed for him when the DJS placed him at the XXXXXXXXXXXXXXXXXXXX, a residential placement in Tennessee (Doc. h).
7. On August 20, 2015, the XXX staff requested the student's educational record directly from the XXXXXXXXXXXXXXXXXXXX and XXXXXXXXXXXXXXXX, a residential placement in Montgomery County, where the student was placed on July 8, 2015 immediately following his placement at the XXXXXXXXXXXXXXXX (Doc. f).
8. On August 21, 2015, the XXXXXXXXXXXXXXXXXXXX provided the XXXX staff with an IEP that was developed at that placement (XX IEP). The XX IEP states that the student has a Specific Learning Disability that impacts math reasoning and contains a goal for the student to "acquire the skills necessary to pass the math section of the GED test." It also states that the student displays behaviors that interfere with his learning, and includes a goal for the student to participate in class, follow directions, and speak respectfully to others. The XX IEP required the provision of five hours per week of special education instruction in the area of math from a "math teacher," five hours per week of group counseling from a "therapist," and one hour per week of individual counseling from a "therapist." The XX IEP also reflects that the math goal would be addressed by a "teacher" and that the social, emotional and behavioral goal would be addressed by "teachers and staff" (Doc. b).
9. On August 28, 2015, the XXX staff were informed that the DJS would be transferring the student to the facility on September 2, 2015 (Review of an August 28, 2015 electronic mail correspondence from the JSE to the XXX).
10. On September 1, 2015, the XXX staff requested the student's educational record from the XXXX (Review of a September 1, 2015 Request for Records and facsimile transmission report).
11. On September 2, 2015, the BCJJC staff provided the XXX staff with the student's educational record. The documents included the IEP, the student's schedule indicating the classes he was taking at the facility, and the transcripts from XXXXXXX and the BCPS (Review of Receipt of IEP/Initiation of Services form, signed on September 2, 2015 by the teachers, the Special Education Folder Access Log, and transcripts from XXXXXXX and the BCPS).
12. On September 4, 2015, two days after the student was transferred by the DJS from the XXXX to XXX, the IEP team convened at the XXX because the staff at that facility had the most current information regarding the student's educational needs. There is documentation that a written invitation to the meeting was sent to the student's mother, and that she participated in the meeting by telephone (Doc. e and review of the sign in sheet for the September 4, 2015 IEP team meeting).

12. At the September 4, 2015 IEP team meeting, the IEP team decided that no additional data was required and that the student continues to meet the criteria for identification as a student with a Specific Learning Disability under the IDEA and that the IEP remained appropriate. However, the XX IEP included a June, 2015 report of the student's progress towards achievement of the goals, which reflects that he was making "very little" to no progress on the behavior goal, and that he was not expected to achieve the goal (Docs. b, c, i, and review of a September 8, 2015 electronic mail message from an IEP team participant to the JSE regarding the recommendations made at the IEP team meeting).
13. The IEP that was generated following the September 4, 2015 meeting clarified that special education instruction was to be provided primarily by a special education teacher, but could also be provided by a general education teacher and an instructional assistant, in the general education classroom. It also clarified that the counseling services were to be provided primarily by a guidance counselor, but could also be provided by a psychologist and school social worker (Doc. c).
15. During the time period that the student was placed at the XXX, there was a vacancy in the math teacher position, and an instructional assistant provided instruction in math. The case management log reflects that a special education teacher worked with the student to provide support in math in the general education classroom on 1 day in September, 2015, on 4 days in October, 2015, on 6 days in November, 2015, one 1 day in December, 2015, on 3 days in January, 2016, and on 3 days in February, 2016 (Review of staffing documents and the XXX case management log).
16. There is no documentation that the student was provided with counseling services as required by the IEP (Review of the educational record).
17. Immediately prior to entering the XXXX, on August 12, 2015, the student scored "well below average" on the Basic Achievement Skills Inventory in the areas of math and reading/language arts. By October 21, 2015, he scored in the "high average" range in math and the "average" range in reading/language arts (Review of the Basic Achievement Skills Inventory results).
18. The reports of the student's progress towards achievement of the annual IEP goals were made on November 20, 2015 and February 19, 2016. The reports indicate that the student was making sufficient progress to achieve the goals by April 2, 2016. The February 19, 2016 report states that the student had already achieved 2 of the 4 objectives on the math goal (Doc. k and review of progress reports).
19. Although the student earned a "D" in algebra I while at the XXXX, upon his release from the facility, he was earning an "A" in geometry, an "A" in English 11, a "B" in government, and a "B" in environmental science (Doc. p and review of Student Record Card 7).

20. Prior to the filing of the State complaint, the JSE staff self-identified concerns about the provision of special education services to the student and began the process of scheduling an IEP team meeting to address the matter (Review of April 28, 2016 electronic mail message from the complainant to the JSE staff and invitation to the April 29, 2016 IEP team meeting).

DISCUSSION/CONCLUSIONS:

Allegations #1, #2, and #3

Provision of Special Education Instruction by a Special Education Teacher and Related Counseling Services at the XXXXX and the XXXX and Maintenance of the Educational Record at the XXXXX

Each public agency must ensure that students are provided with the special education and related services required by the IEP (34 CFR §§300.101 and .323 and COMAR 13A.05.11.06).

If a student with an IEP transfers to a new public agency within the State, the new public agency (in consultation with the parents) must provide the student with a Free, Appropriate, Public Education (FAPE), including services comparable to those described in the student's IEP from the previous public agency, until the new public agency either adopts the IEP from the previous public agency or revises the IEP (34 CFR §300.323).

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

Within two (2) days after receiving notice that a student in State-supervised care seeks to enroll, the public agency in which the student is seeking enrollment must make a written request for the educational record of the student in State-supervised care from the public agency in which the student was previously enrolled. Within three (3) school days after receiving notice, the public agency in which the student in State-supervised care was previously enrolled must send the student's record to the public agency making the request (COMAR 13A.08.07.03).

The JSE is required to implement procedures to obtain, maintain, and share student records consistent with this requirement (COMAR 13A.05.11.09). The *JSE Special Education Policies and Procedures* states that school staff must request the record from the last known school of enrollment within forty-eight (48) hours of receiving notice of the student's entry into a DJS facility. The school staff are required to maintain contact logs documenting at least three (3) diligent attempts within five (5) days to obtain the record and must continue their efforts until the record is obtained (Doc. o).

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Based on the Findings of Facts #1 - #7 and #16, the MSDE finds that the XXXX did not have the current IEP and, therefore, could not implement the IEP. However, based on those Findings of Facts, the MSDE finds that the XXXX staff made attempts to obtain the student's educational record in order to do so, in accordance with the JSE procedures. Therefore, this office does not find that a violation occurred with respect to Allegations #1 and #2.

Based on the Findings of Facts #6 - #16, and #20, the MSDE finds that the student was not provided with special education instruction from the providers required by the IEP and was not provided with the related counseling services required by the IEP at the XXX. Therefore, this office finds that a violation occurred with respect to Allegation #3.

Allegation #4 Review and Revision of the IEP at the XXXX

In making changes to an IEP after the annual IEP team meeting for a school year, the parent and the public agency may agree not to convene an IEP team meeting for the purposes of making those changes, and instead may develop a written document to amend or modify the IEP. Otherwise, any revisions made to the IEP must be made through the IEP team process (34 CFR §300.324).

In this case, the complainant alleges that the JSE unilaterally revised the XX IEP without convening the IEP team or obtaining the agreement of the parent (Doc. i).

Based on the Findings of Facts #2, and #12 - #14, the MSDE finds that the documentation does not support the allegation. Therefore, this office does not find that a violation occurred with respect to the allegation.

Allegation #5 IEP That Addresses the Student's Social, Emotional, and Behavioral Needs at the XXX

In order to provide a student with a 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 the IEP team considers the strengths of the student, the concerns of the parents for enhancing the education of the student, the results of the most recent evaluation, and the academic, developmental, and functional needs of the student. In the case of a student whose behavior impedes the student's learning or that of others, the IEP team must consider the use of positive behavioral interventions and supports, and other strategies to address the behavior (34 CFR §§300.101, .320, and .324).

The public agency must also ensure that the IEP team reviews the IEP periodically, but not less than annually, to determine whether the annual goals are being achieved. In addition, the public agency must ensure that the IEP team revises the IEP, as appropriate, to address any lack of expected progress toward achievement of the annual IEP goals (34 CFR §300.324).

In this case, the complainant alleges that the student demonstrated behavior that interfered with his learning, as evidenced by his struggles in math class, and that the JSE did not ensure that the IEP team convened to consider behavioral interventions and supports, and other strategies, to address the behavior (Doc. i).

Based on the Finding of Fact #13, the MSDE finds that there is no documentation of data to support the IEP team's September 4, 2015 decision that the IEP remained appropriate despite the reported lack of expected progress towards achievement of the annual goals. Therefore, this office finds that a violation occurred with respect to the allegation.

Notwithstanding the violation, based on the Findings of Facts #17 - #19, the MSDE finds that the student subsequently made sufficient progress towards achievement of the goals. Therefore, no student-specific corrective action is required to remediate the violation.

**ALLEGATION #6: OPPORTUNITY TO EARN SERVICE-LEARNING HOURS
 AT THE XXX**

FINDINGS OF FACTS:

21. All public agencies in Maryland, including the JSE, have chosen to design local programs in student service to address their unique academic and community needs. Some school systems require that students conduct independent service-learning projects to fulfill part of the graduation requirement. In these school systems, students are given guidelines stating how much service is expected and which organizations are appropriate sites for service. They infuse service-learning into existing courses as all or part of their plan. In most cases, students complete all service learning elements – preparation, action, and reflection – as part of their regular school day. In other school systems, students carry out one or more elements as part of a class and perform the remaining elements on their own after school or on weekends (<http://marylandpublicschools.org>).
22. The JSE's service learning plan indicates that students in grades 7 – 12 participate in both school-wide and content-based service-learning projects, which are extended instructional activities that expand academic concepts taught in the classroom. Students entering a DJS facility become engaged in ongoing content-based academic projects with instruction provided at their individual levels of performance. Activities are offered each spring and fall. The spring activity offered at all JSE schools from January 2016 to July 2016 involves participation in a worldwide initiative to knit/crochet blankets for the less fortunate (<http://marylandpublicschools.org>).
23. At the school level, service-learning plans are implemented by principals by assisting with projects plan development, ensuring that plans are executed as designed, monitoring implementation, supervising staff involved in plan execution, ensuring that students complete the required reflection essay, and overseeing documents of student service-

learning hours. The XXX offers a school-wide project entitled, "Environmental Enhancement," which involves students constructing wooden planter boxes, planting flowers, and painting a mural outside the entrance to the school building to enhance the environment. It also offers a content-based project entitled, "Frederick County 4-H Therapeutic Riding Program," in which students work at the stable of a non-profit organization that provides recreational experiences to Frederick County citizens with disabilities through equestrian activities (<http://marylandpublicschools.org>).

24. During the previous school year, the XXX offered an "Aquaponics Program," in which students were able to participate in an aquaculture project in which they plant flowers and vegetables, care for fish, and learn about the ecosystem they create (Tour of the Aquaponics Program and review of the JSE Local School System Annual Service-Learning Experience Tally, dated June 24, 2015).
25. The JSE Local School System Annual Service-Learning Experience Tally, which was submitted to the MSDE at the end of the 2014-2015 school year, reflects that 284 JSE students earned a total of 1,376 service-learning hours (Review of the JSE Local School System Annual Service-Learning Experience Tally, dated June 24, 2015).

DISCUSSION/CONCLUSIONS:

To be awarded a Maryland High School Diploma, a student must also have completed either 75 hours of student service that includes preparation, action, and reflection components, and that, at the discretion of the local school system, may begin during the middle grades, or a locally designed program in student service that has been approved by the State Superintendent of Schools (COMAR 13A.03.02.06).

In this case, the complainant alleges that the XXX does not provide opportunities for students to earn service learning hours (Doc. i).

Based on the Findings of Facts #21 - #25, the MSDE finds that the documentation does not support the allegation, and does not find that a violation occurred with respect to the allegation.

**ALLEGATION #7: PROVISION OF SPECIAL EDUCATION INSTRUCTION
FROM TEACHERS WHO ARE CERTIFIED IN THE AREAS
TAUGHT AT THE XXX**

FINDINGS OF FACTS:

26. There is documentation that, in February 2016, the XXX principal made arrangements with the JSE for supervision of the instructional assistant who was teaching math by a certified math teacher. However, there is no documentation of supervision of the

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instructional assistant from a certified math teacher from September, 2015 through January, 2016 (Doc. l).

27. There is currently a teacher assigned to provide math instruction at the XX who holds certification in the areas of instruction provided (Review of staffing documents).

DISCUSSION/CONCLUSIONS:

The IDEA requires that the State Education Agency establish and maintain qualifications to ensure that personnel necessary to carry out the requirements of the IDEA are appropriately and adequately prepared and trained, including those personnel who have the content knowledge and skills to serve students with disabilities. However, this requirement does not create a right of action on behalf of an individual student or class of students for the lack of the provision of instruction by an individual who is not highly qualified (34 CFR §§300.18, .101, .156, .323).

The JSE is required to ensure that instruction is provided by personnel with valid Maryland Educator Certificates so that educational staff possess the minimum essential knowledge and skills needed to achieve outcomes for public education and maintain competent practice through career-long engagement with their content area (COMAR 13A.05.11.07 and 13A.12.01.01).

The *JSE Special Education Policy and Procedures* state that, in the event that a content area teacher is not available to provide instruction for an extended period of time, a certified teacher will provide oversight to the staff designated to provide instruction (Doc. o).

In this case, the complainant asserts that the public agency has developed procedures to strengthen recruitment efforts and to obtain substitute teachers who are supervised by certified teachers while vacancies are being filled, and alleges that these procedures are not being implemented (Doc. i).

Based on the Finding of Fact #26, the MSDE finds that there is no documentation of supervision by a certified math teacher from September, 2015 through January, 2016. Therefore, this office finds that a violation occurred.

Notwithstanding the violation, based on the Finding of Fact #27, the MSDE finds that, because there is no right of action on behalf of an individual student or class of students for the lack of the provision of instruction by a certified teacher and the position is now filled with a certified math teacher, no corrective action is required to remediate the violation.

CORRECTIVE ACTIONS/TIMELINE:

The MSDE requires the JSE to provide documentation by September 1, 2016 that compensatory services or other agreed upon remedy has been offered for the violation identified. When considering the compensatory services required to redress the loss of appropriate services during

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this time period, the public agency and the parent may consider alternative methods to redress the loss of appropriate services to the student. The alternative methods may include, but are not limited to, compensatory services in the form of transition services to assist the student with transition from high school to post-school activities.

The MSDE requires the JSE to provide documentation by September 1, 2016 of the steps taken to ensure that the XXXX staff implements the requirement to review and revise, as appropriate, the IEP, consistent with the data, to address lack of expected progress.

The MSDE further requires the JSE to provide documentation by September 1, 2016 of the steps taken to ensure that the XXX staff properly implements the requirements for the provision of special education instruction in accordance with the IEP and for ensuring proper supervision of noncertified individuals with teachers who are certified the content areas taught.

The above documentation must include a description of how the JSE will evaluate the effectiveness of the steps taken and monitor to ensure that the violation does not recur.

TECHNICAL ASSISTANCE:

Technical assistance is available to the parties through Dr. Nancy Birenbaum, MSDE. Dr. Birenbaum may be contacted at (410) 767-0255.

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

If additional information is provided, it will be reviewed and the MSDE will determine if a reconsideration of the conclusions is necessary. Upon consideration of this additional documentation, this office may leave its findings and conclusions intact, set forth additional findings and conclusions, or enter new findings and conclusions. Pending the decision on a request for reconsideration, the public agency must implement any corrective actions consistent with the timeline requirements as reported in this Letter of Findings.

Questions regarding the findings of facts, conclusions, and corrective actions contained in this letter should be addressed to this office in writing. The student's parents and the JSES 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

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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: XXXXXX
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