



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

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August 10, 2017

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Ms. Deborah Grinnage-Pully  
Executive Director, Juvenile Services Education System  
Maryland State Department of Education  
200 West Baltimore Street  
Baltimore, Maryland 21201

RE: XXXXX  
Reference: #17-135

Dear Parties:

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

**ALLEGATIONS:**

The MSDE investigated a complaint received 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 System (JSES) 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 JSES did not ensure that the student was provided with special education instruction in the educational placement required by the Individual Education Plan (IEP) while he was placed by the Maryland Department of Juvenile Services (DJS) at the XXXXXXXXXXXXXXX (XXXX) from May 23, 2016 to June 7, 2016, in accordance with 34 CFR §§300.101 and .323.

2. The JSES did not ensure that revisions made to the IEP on June 7, 2016, while the student was placed by the DJS at XXX were based on the student's needs, in accordance with 34 CFR §300.324.
3. The JSES did not ensure that the student was provided with the opportunity to earn service learning hours necessary to progress towards the standards for graduation while he was placed by the DJS at XXX, the XXXXXXXXXXXXXXXXXXXXXXXXXX (XXXX) and the XXXXXXXXXXXXXX (XXX), in accordance with COMAR 13A.03.02.05 and 13A.05.11.03.
4. The JSES did not ensure that the student was provided with the opportunity to complete courses that he had begun taking, and did not ensure that he was enrolled in courses for which he had not earned credit, in order to allow him to work to achieve credit requirements necessary to progress towards the standards for graduation, while he was placed by the DJS at XXXX from May 23, 2016 to July 12, 2016, and while he was placed by the DJS at XXX from July 13, 2016 to August 30, 2016, in accordance with 34 CFR §§300.101 and .149, and COMAR 13A.05.11. and 13A.08.02.
5. The JSES did not ensure that the student's educational record was maintained while he was placed by the DJS at XXX and XXX, because it did not include the Prior Written Notice documents of the decisions made at the IEP team meetings convened on June 7, 2016, and August 11, 2016, in accordance with COMAR 13A.05.11 and 13A.08.02.

**INVESTIGATIVE PROCEDURES:**

1. On May 5, 2017, the MSDE sent a copy of the complaint, via facsimile, to Ms. Beth Hart, Director, JSES.
2. On May 17, 2017, 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 JSES of the allegations and requested that JSES review the alleged violations.
3. On June 14, 2017, Ms. K. Sabrina Austin, Education Program Specialist, MSDE, and Ms. Linda Koban, Compliance Specialist, MSDE, met with Ms. Dawn Hubbard, Compliance Specialist, JSES, to review documents and discuss the allegations.
4. On June 14, 2017, July 5, 2017, and August 3 – 5, and 8, 2017, the JSES provided documents to the MSDE for consideration.

5. On July 5, 2017 Ms. Austin, Ms. Koban, and Ms. Hubbard, conducted a site visit at XXXXXXXX, and interviewed Ms. XXXXXXXX, Principal, XXX, and Ms. XXXXXXXX, special education math teacher, XXXXXXXX.
6. On August 1, 2017, Ms. Mandis, Ms. Austin and Ms. Koban discussed the allegations with Ms. Hubbard.
7. On August 2 - 4, 2017, the MSDE requested the JSES to provide documentation for consideration.
8. On August 4, 2017, Ms. Austin interviewed Ms. XXXXXXXX, Principal, XXXX and XXX. Ms. Hubbard was present during the interview.
9. The MSDE reviewed documentation, relevant to the findings and conclusions referenced in this Letter of Findings, which includes:
  - a. IEP developed by the Montgomery County Public Schools (MCPS, dated February 9, 2016;
  - b. Behavioral Intervention Plan (BIP), dated February 9, 2016;
  - c. IEP and Prior Written Notice, dated June 7, 2016;
  - d. Amended IEP, dated August 11, 2016;
  - e. Prior Written Notice, dated August 11, 2016;
  - f. IEP and Prior Written Notice, dated February 7, 2017;
  - g. Prior Written Notice, dated October 6, 2016;
  - h. The student's transcript from XXXXXXXXXXXXXXXXXXXX for the 2015 - 2016 school;
  - i. The XXXXXXXX log of the request and receipt of the student's educational records in May 2016;
  - j. XXXXX Student Record Card (SR7);
  - k. The XXXX Student Record Card (SR7);
  - l. The XXX Student Record Card (SR7);
  - m. The logs of other students' service learning activity at XXXX in May 2016 and June 2016;
  - n. The log of the student's service learning activity at XXXX in May 2016;
  - o. The student's "Annual Secondary School Performance Data Summary" documenting courses completed and credits earned for the 2014 - 2015, 2015 - 2016, and 2016 - 2017 school years (SR7), undated;
  - p. Electronic mail (email) communication from the complainant to the MSDE, dated July 11, 2017;
  - q. Correspondence from the complainant to the JSES, dated April 5, 2017, and release of records signed by student's mother on March 29, 2017;

- r. Notice of an IEP team meeting scheduled for June 7, 2016;
- s. The JSE Service Learning Plans for the XXXXXXXXXXXXXXXXXXXXXXXX, the XXXXXXXXXXXXXXXXXXXXXXXX, the XXXXXXXXXXXXXXXXXXXXXXXX, and the XXXXXXXX XXXX, dated August 27, 2010;
- t. Descriptions of the XXX “Aquaponics,” “Environmental Enhancement,” and “Frederick County 4H Therapeutic Riding Program” service learning projects, undated;
- u. Emails from the JSES staff to the complainant, dated April 14, 2017;
- v. Email from the Office of the Attorney General to the complainant, dated August 4, 2017;
- w. Reflection forms of other students’ service learning activity at XXXX during the 2015 – 2016 school year, and at XXX during the 2016 – 2017 school year;
- x. XXXX service learning project description, undated;
- y. The JSES Service Learning Implementation Plan, dated December 5, 2016; and
- z. Correspondence from the complainant alleging violations of the IDEA, received by the MSDE on May 4, 2017.

**BACKGROUND:**

The student is nineteen (19) years old, and is identified as a student with an Emotional Disability under the IDEA. He has an IEP that requires the provision of special education instruction and related services (Docs. a, c, d, and f).

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

- From May 20, 2016 to July 12, 2016, the DJS placed the student at XXXXX.
- From July 12, 2016 to August 30, 2016, the DJS placed the student at XXXX.
- From August 30, 2016 to March 28, 2017, the DJS placed the student at XXX.
- After the student’s release from XXXX on March 28, 2017, the Montgomery County Public Schools (MCPS) placed him at XXXXXXXXXXXXXXXX, a nonpublic separate special education school (Docs. j - l, and p).

**ALLEGATION #1                      IMPLEMENTATION OF THE IEP AT XXXX FROM  
MAY 23, 2016 TO JUNE 7, 2016**

**FINDINGS OF FACTS:**

1.     On May 23, 2016, the student was enrolled in the education program at XXXX. Prior to his enrollment at XXXXX, the student was placed by the MCPS at XXXXXXXXXXXXXXX XXXX (XXXX) (Docs. a and h - j).
2.     On May 23, 2016, the same day as his entry in the education program at XXXXX, the XXX school staff requested and received the student's educational records from XXXX (Doc. i).
3.     On May 25, 2016, following the review of the student's IEP in effect at the time (XXX IEP), his transcript, and his Behavior Intervention Plan (BIP), the XXX school staff contacted the student's mother to discuss scheduling an IEP team meeting (Docs. b, i and q).
4.     The XXX IEP reflects that the student requires thirty-two (32) hours of specialized instruction per week, to be provided primarily by a special education teacher, in a separate special education classroom. It also reflects that the student required the support of a BIP to help him remain in his assigned area and to reduce his verbal and physical aggressive behaviors. The XXXX IEP documents that the student requires a highly structured environment and a low student to staff ratio, in order to address his social-emotional needs (Docs. a and b).
5.     There is no documentation that the student was provided specialized instruction, by a special education teacher, in all subjects, in a separate special education classroom, from May 25, 2016 to June 7, 2016. However, there is documentation that, in the general education classroom, the student was receiving the support of a special education teacher in English and math classes (Review of the student's educational record, review of the XXX school staff schedule, and interviews with the XXXX staff and the JSES staff).
6.     The XXXXX school staff report, and there is documentation that, from May 25, 2016 to June 7, 2016, the staff attempted to remove the student from the general education classroom in order to provide specialized instruction in the placement required by the XXXX IEP. However, the student either refused to be removed, or when removed, he refused to complete classwork in the separate special education classroom (Review of the XXXX staff's record of services).

7. The general education classroom at XXX provides instruction in small sized classes,<sup>1</sup> in a highly structured setting, with low student to teacher ratios, access to mental health services, a behavioral support system, and DJS staff for additional behavioral support (Doc. c).
8. On June 7, 2016, the IEP team determined that the general education classroom at XXXX provides the student with the same supports and learning environment as what the XXX IEP required. The IEP team revised the student's IEP to require the student to receive all instruction, including specialized instruction, in a general education classroom (Doc. c).

### **DISCUSSION/CONCLUSIONS:**

Each public agency must ensure that students are provided with the special education and related services required by the IEP. In order to do so, the public agency must ensure that the IEP is written in a manner that is clear with respect to the special education and related services that are to be provided (34 CFR §§300.101, .320 and .323).

When a student with an IEP transfers to a new public agency within the State, that 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).

The complainant alleges that, during the student's placement at XXXX from May 23, 2016 to June 7, 2016, the JSES did not ensure that he was provided with the specialized instruction in the educational placement required by the XXX IEP.

Based on the Findings of Facts #1 - #3, the MSDE finds that, on the same day that the student transferred into the JSES, the XXX school staff promptly obtained the student's educational records, contacted the student's parent, and scheduled an IEP team meeting.

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<sup>1</sup> There is documentation that, from the student's date of enrollment at XXXXXXXX to the date of the IEP team meeting on June 7, 2016, the student's class sizes ranged from five (5) to eleven (11) students (Review of the XXX attendance logs).

Based on the Findings of Facts #4 - #6, the MSDE finds that there is documentation that the XXXX school staff offered the student special education instruction in the educational placement required by the XXX IEP, but the student was unwilling to receive the instruction in that setting. Based on the Finding of Facts #4 - #8, the MSDE finds that when the IEP team convened at the end of the two (2) week period identified in the allegation, the IEP team determined that the general education classroom at XXX provides the student with the same level of instruction and supports required in the placement required by the XXXXX IEP. Therefore, the MSDE does not find that a violation occurred with respect to this aspect of the allegation.

**ALLEGATION #2                      REVISION OF THE IEP ON JUNE 7, 2016**

**FINDINGS OF FACTS:**

9. On June 7, 2016, the IEP team convened to review the Mann IEP which was in effect since his enrollment at XXX. The XXX IEP reflects that the student displays frustration and impulsivity, is “easily angered,” and has difficulty with problem-solving and using effective interpersonal skills to manage his behaviors. The XXX IEP states that the student’s behavior, which can include verbal and physical aggression, property destruction, use of profanity, and “physical posturing when angry,” can become disruptive to the learning environment (Doc. a).
10. The XXX IEP states that the student “needs a highly structured setting with access to behavioral supports,” and a low student to staff ratio. It requires that the student be provided with thirty-two (32) hours per week of specialized instruction in a separate special education classroom by a special education teacher (Docs. a and c).
11. The XXX school staff explained that the general education classroom model at XXX is small in size, highly structured, has a low student to teacher ratio, utilizes “a school-wide support system using a point sheet to support positive behavioral outcomes.” The XXXX school staff also explained that, in the general education classroom at XXXX, students have access to mental health services, as well as the support of a general education teacher, a special education teacher, and DJS staff to assist with classroom behavior management (Doc. c).
12. The XXXX staff reported that the student has “been following the school-wide Challenge Behavior Point Program.” They reported that he was achieving success, at a rate of “96% or higher,” in being compliant in all areas, including following staff instructions, appropriate use of verbal expressions, displays of personal and social behavior, and remaining on task (Doc. b).

13. At the time of the meeting, the IEP team had information available to it that the student was refusing to do classwork when the XXX school staff attempted to provide him with specialized instruction in a separate special education classroom (Review of the XXX school staff's record of services).
14. The IEP team discussed the student's academic performance in the general education classroom setting since his enrollment at XXX. The IEP team considered that the student was doing well in English and math classes where he was receiving the support of a special educator, but that he was failing his history and career research development classes where he was not receiving specialized instruction from a special education teacher because he was not completing classwork. However, the IEP team decided that the student no longer required specialized instruction in all classes other than math and English, and that he would receive special education instruction in the general education classroom (Docs. a and c, and review of the XXXX school staff schedule).

#### **DISCUSSION/CONCLUSIONS:**

In developing each student's IEP, the public agency must ensure that the IEP team considers the strengths of the student, the concerns of the parents for enhancing the education of the student, the results of the most recent evaluation, and the academic, developmental, and functional needs 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 that behavior (34 CFR §300.324).

The public agency must also ensure that the educational placement is made by the IEP team and is based on the IEP. The educational placement may not be based solely on the factors such as the configuration of the service delivery system, availability of staff, or administrative convenience, and the public agency must ensure that a student is not removed from age-appropriate regular classrooms solely because of needed modifications in the general education curriculum (34 CFR §300.116, COMAR 13A.05.01.10, and *Letter to Clay*, United States Department of Education, Office of Special Education Programs, 23 IDELR 341, May 17, 1995).

The complainant alleges that the IEP team's decisions, on June 7, 2016, to reduce the amount of specialized instruction that the student requires and to change his placement, were not based on the student's needs but on the configuration of the service delivery system at XXXXX.

Based on the Findings of Facts #9 - #14, the MSDE finds that the IEP team's decision that the student no longer required special education instruction in classes other than math and English was inconsistent with the data. Therefore, this office finds that a violation occurred with respect to this aspect of the allegation.



However, based on the Findings of Facts #9, #10, #13 and #14, the MSDE finds that the IEP team's decision regarding the educational placement in which special education instruction would be provided was supported by the data. Therefore, no violation is identified with respect to that aspect of the allegation.

**ALLEGATION #3**

**SERVICE LEARNING OPPORTUNITIES**

**FINDINGS OF FACTS:**

9. All public agencies in Maryland, including the JSES, 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>).
10. The JSES' 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. 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 (<http://marylandpublicschools.org>).

**XXXX**

11. There is documentation that the student was involved in a service learning opportunity at XXXXXXXX that involved crocheting squares for blankets to be given to charities, but did not complete the work required to earn service learning hours (Docs. j, m, n and y, and interview with the school staff).

**XXXX and XXX**

12. There is documentation that XXXXX and XXX have developed plans for service learning opportunities, and that XXXXX and XXX offered service learning

opportunities to students during the school years that included the period of time when the student was enrolled (Docs. k, l, s, t, w and x).

**DISCUSSION/CONCLUSIONS:**

To be awarded a Maryland High School Diploma, a student must engage in service learning experiences. Service learning is a teaching method that combines meaningful service to the community with curriculum-based learning (COMAR 13A.03.02.05).

The JSES is required to provide a comprehensive education program for youth in DJS facilities to meet the public school standards. This program must consist of instruction to allow students to achieve credit requirements necessary to progress towards the standards for graduation consistent with the requirements in COMAR 13A.03.02 (COMAR 13A.05.11.03).

**XXXX**

Based on the Findings of Facts #9 - #11, the MSDE finds that the documentation does not support the allegation, and does not find a violation occurred with respect to this aspect of the allegation.

**XXXX and XXX**

Based on the Findings of Fact #9, #10 and #12, the MSDE finds that, while there is no documentation that the student was offered service learning opportunities during the periods when he was enrolled at XXXX and XXX, there is documentation that students were provided with service learning opportunities during the school years when the student was enrolled. Therefore, the MSDE does not find a violation with respect to this aspect of the allegation.

**ALLEGATION #4                      COURSE AVAILABILITY**

**FINDINGS OF FACTS:**

13. At the time the student was placed at XXXXX, he had been taking nine (9) courses at XXX, including English 9, English 10, and government. The student had not earned credit for these courses when he was placed at XXXX (Doc. h).
14. When the student entered XXX, he was enrolled in English 9, but not English 10. He was also enrolled in United States history, but not government. In addition, the student was enrolled in other core courses for which he had not earned credit (Docs. h and j).
15. While placed at XXX, and XXXXX, the student was able to earn credits for English 10 and government (Docs. k, l and o).

16. The student was provided with the amount of educational instruction required while placed at XXXX, XXX, and XXXX, and was not required to take any courses for which he had already earned credit (Docs. j – l and o).

**DISCUSSION/CONCLUSIONS:**

The IDEA requires that a FAPE be provided to students with disabilities through an IEP that meets the needs that result from the disability and enables them to be involved in and make progress in the general curriculum (34 CFR §§300.101, .103, .320, and .323). Therefore, the JSES must ensure that students in each DJS facility have access to instruction to allow them to achieve credit requirements and assessments necessary to progress towards the State standards for graduation from a public high school (COMAR 13A.05.11.03).

To be awarded a Maryland High School Diploma, a student must have earned a minimum of twenty-one credits, including core credits in English, fine arts, mathematics, physical education, health education, science, social studies, and technology education. Core credits must also be earned in world language or American Sign Language, and in advanced technology education or a career and technology program (COMAR 13A.03.02.03).

In order to provide students with sufficient time to meet these requirements, the JSES must ensure that its schools operate at least 220 school days per year and a minimum of 1,320 school hours during a twelve month period. The JSES is required to have a written schedule for each school that states that the beginning and end of the 6-hour school day and the specific time periods during the day when the areas of instruction are implemented (COMAR 13A.05.11.04).

In this case, the complainant alleges that the student was not provided with access to instruction in core English and social studies courses that he had been taking prior to his placement at XXX in order to progress through the general curriculum (Doc. w).

Based on the Findings of Facts #13 - #16, the MSDE finds that there is documentation that the student was provided with access to instruction in core English and social studies classes at XXXX. Based on those Findings of Facts, the MSDE further finds that, while the student was not enrolled in every class he had been taken at XXX when he was placed at XXXX, he was enrolled in core courses for which he needed to earn credit. In addition, based on the Finding of Fact #15, the MSDE finds that the student was able to earn credits in the English and social studies courses in which he was enrolled at XXXX while enrolled in the JSES. Therefore, this office does not find that a violation occurred with respect to the allegation.

## **ALLEGATION # 5 MAINTENANCE OF THE STUDENT'S EDUCATIONAL RECORD**

### **FINDINGS OF FACTS:**

17. On April 5, 2017, the complainant sent correspondence to JSES staff requesting a copy of the student's educational record. The correspondence included a release from the student's parent authorizing the complainant to access the student's "entire educational record." The complainant requested that the records be provided via fax, scan or mail (Doc. q).
18. On April 14, 2017, the JSES sent the student's education record to the complainant, via email (Doc. u).
19. The documents sent by the JSES staff to the complainant on April 14, 2017, did not include the June 2016 or the August 2016 Prior Written Notice documents that are maintained in the educational record (Docs. c, e and v, and review of the educational record).
20. There is documentation that, on August 4, 2017, the complainant was provided with the June 2016 and August 2016 Prior Written Notice documents (Doc. v).

### **DISCUSSION/CONCLUSIONS:**

Student records provide information about a student's academic and functional performance. Therefore, the proper maintenance of these records is necessary to ensure that accurate information is available to plan for the student's education. The IDEA requires that all student educational records are to be maintained in accordance with the Family Educational Rights and Privacy Act (FERPA) (34 CFR §§300.610 - .627).

In order to ensure proper student records management, the local public agencies in the State are required to maintain educational records consistent with the *Maryland Student Records System Manual* (COMAR 13A.08.02.01 and .02). The *Maryland Student Records System Manual* requires that records, including all IEP documents, be maintained in the educational record (*Maryland Student Records System Manual*, 2016).

Based on the Findings of Facts #17 - #20, the MSDE finds that, while some of the IEP documents were not provided to the complainant at her request, they are maintained in the record. Therefore, this office does not find that a violation occurred.

**CORRECTIVE ACTIONS/TIMELINES:**

**Student-Specific**

The MSDE requires that the JSE provide documentation by November 1, 2017, that the IEP team has determined whether the violation related to the failure to ensure that an IEP was developed consistent with the data, had a negative impact on the student's ability to benefit from his education program. If the IEP team determines a negative impact, the IEP team has determined the compensatory services or other remedy for the violation, and that the compensatory services have been offered.

When considering compensatory services, alternative methods to redress the loss of appropriate services may be considered. This includes, but is not limited to, services to assist the student in obtaining a Maryland High School Diploma or a Maryland High School Diploma by Examination.

**School-Based - XXXX**

The MSDE requires that the JSES provide documentation by October 1, 2017 of the steps taken to ensure that the XXXX school staff comply with the requirements for IEP development based on the data.

**TECHNICAL ASSISTANCE:**

Technical assistance is available to the parties through Dr. Nancy Birenbaum, MSDE. Dr. Birenbaum may be contacted at (410) 767-7770.

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 JSES must implement any corrective actions consistent with the timeline requirements as reported in this Letter of Findings.

Grace Reusing, Esq.  
Ms. Deborah Grinnage-Pully  
August 10, 2017  
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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 parent 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 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/ksa

c:     XXXXXXXXXX  
       Beth Hart  
       Crystal Fleming-Brice  
       XXXXXXXXXX  
       Dawn Hubbard  
       Anna Lisa Nelson  
       XXXXXXXXXX  
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