

July 3, 2024

[REDACTED]
[REDACTED]
[REDACTED]

Ms. Trinell Bowman
Associate Superintendent-Special Education
Prince George's County Public Schools
John Carroll Center
1400 Nalley Terrace
Landover, Maryland 20785

RE: [REDACTED]
Reference: #24-218

Dear Parties:

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

ALLEGATIONS:

On May 7, 2024, MSDE received a complaint from [REDACTED], hereafter, "the complainant," on behalf of the above-referenced student. In that correspondence, the complainant alleged that the Prince George's County Public Schools (PGCPS) violated certain provisions of the Individuals with Disabilities Education Act (IDEA) with respect to the above-referenced student.

MSDE investigated the following allegations:

1. The PGCPS has not ensured that the student has been provided with the special education instruction and related services required by the Individualized Education Program (IEP) since the start of the 2023-2024 school year, in accordance with 34 CFR §§300.101 and .323. Specifically, the complainant alleges the student has not received their accommodations.
2. The PGCPS did not consider the student's need for Extended School Year (ESY) services since June 2023, in accordance with 34 CFR §300.106, COMAR 13A.05.01.07B(2) and COMAR 13A.05.01.08B(2).
3. The PGCPS did not ensure that the IEP team addressed the parent's concerns regarding the need for a dedicated aide and the student's behavior since the start of the 2023-2024 school year, in accordance with 34 CFR §300.324.
4. The PGCPS did not follow proper procedures when determining the student's educational placement for the 2023-2024 school year, in accordance with 34 CFR §§300.114 -.116 and .321.

5. The PGCPS did not ensure that the IEP team meeting convened in March 2024, included the required participants, in accordance with 34 CFR §300.321.
6. The PGCPS has not ensured that the student's IEP was reviewed and revised to address her lack of expected progress toward achieving the IEP goals since the start of the 2022-2023¹ school year, in accordance with 34 CFR §300.324.
7. The PGCPS did not provide the parent with an interpreter in their native language at an IEP meeting since March 2024, in accordance with 34 CFR §§300.322.
8. The PGCPS did not provide the parents with prior written notice of the IEP team's decisions from the IEP team meeting held in March 2024, in accordance with 34 CFR §300.503.
9. The PGCPS did not follow proper procedures when disciplinarily removing the student from school during the 2023-2024 school year, in accordance with 34 CFR §§300.530 and .531, COMAR 13A.08.03, and COMAR 13A.05.01.10.

BACKGROUND:

The student is 15 years old and is identified as a student with Autism and Intellectual Disability (ID) under the IDEA. The student currently attends [REDACTED] and has an IEP that requires the provision of special education instruction and related services.

FINDINGS OF FACT:

1. The student's IEP at the start of the 2023-2024 school year was amended on June 9, 2023. The IEP reflects identified needs in the areas of communication, math calculation, math problem solving, reading vocabulary, and written language expression. The IEP includes goals addressing these same areas of concern. Additionally, the IEP indicates that the student participates in alternate state assessments and follows alternate academic achievement standards. Furthermore, it specifies that she will receive a Maryland High School Certificate of Program Completion.
2. The June 9, 2023, IEP requires the student to receive 23 hours and 20 minutes of specialized instruction per week in a separate classroom and one hour per month of speech and language services outside of the general education classroom as a related service. The IEP reflects that the student has significant delays in intellectual, social, and adaptive areas that affect all areas of learning. She requires small group settings, an adapted environment, and adapted materials for instruction, including support for adaptive/functional, fine motor, gross motor, social/emotional, and communication skills. The student's ability to be independent, socialize with others, and demonstrate what she knows requires the support of a special education instructional team throughout the school day.
3. The June 9, 2023, IEP's Present Levels of Academic Achievement and Functional Performance (PLAAFP) reflect that the student experiences challenges in understanding and remembering information, following directions, and recalling complex concepts. Her disability adversely impacts her academic success in reading, writing, and math. The student's impact statement indicates that without

¹ The Letter of Initiation reflects the 2021-2022 school year, however, it should read the 2022-2023 school year.

assistance, modification, and accommodation, “her ability to participate in the grade-level education curriculum will be unsuccessful and very limited.” The student is non-verbal and uses gestures and signs to communicate.

4. The student’s IEP, developed on June 9, 2023, requires the student to be provided with the following accommodations:

- Frequent and/or immediate feedback;
- Allow use of manipulatives;
- Provide alternative ways for the student to demonstrate learning;
- Reduced distractions to self;
- Reduced distractions to others;
- Calculation device on calculation and non-calculation portions of assessments; and
- Extended time: time and a half.

The IEP also reflects that the student’s current academic and functional skills are significantly below grade level. Therefore, the student needs to be provided with supplementary aids, services, program modifications, and support to access the general education curriculum. However, these supports are not reflected in the IEP.

5. On September 26, 2023, the IEP team met to review assessment data and observations conducted for the student due to concerns from the school team and the complainants who requested a new placement. The Prior Written Notice (PWN) generated after the meeting reflects that during the IEP meeting, the team reviewed a psychological assessment conducted by PGCPs dated June 6, 2023, as well as educational assessment data and behavioral observations. Due to the data and the nature of the student’s needs, the IEP team recommended that additional support staff be assigned for the student to maintain her safety. There is no documentation that the IEP team discussed placement considerations with the complainant. The PWN does not reflect consideration of any data from the updated educational assessment and observations.

6. On September 27, 2024, PGCPs conducted a Functional Behavior Assessment (FBA). There is no documentation indicating that the report was reviewed by the IEP team.

7. On November 27, 2023, the IEP team met to discuss the parent’s concerns and the student’s progress. The PWN generated after the meeting reflects that the IEP team proposed the student receive an Occupational Therapy (OT) consultation to address stimming and biting behaviors, a consultation with the PGCPs Behavior Team, and a consultation with the Autism Team. Due to the student’s self-injurious behaviors, eloping, pushing to get to a desired object, and need for assistance with sustaining attention, the IEP team proposed to assign a dedicated aide/additional adult support. However, the complainant disagreed, stating she felt the “student’s needs could be better met in a smaller environment with students who have similar needs,” and requested a more restrictive placement. The complainant was provided with procedural safeguards due to her disagreement. There is no documentation indicating that the IEP team discussed placement as requested by the parent.

8. On November 27, 2023, PGCPs conducted a Behavior Intervention Plan (BIP). There is no documentation indicating that the report was reviewed with the IEP team, nor is there documentation to support the provision of the BIP.

9. On February 23, 2024, the parent received a "Notice of IEP Team Meeting" to review and, if appropriate, revise the IEP, consider Extended School Year (ESY) services, postsecondary goals, transition services, and conduct the annual review scheduled for March 18, 2024.
10. On March 18, 2024, the IEP team met for an annual review IEP team meeting to discuss ESY services, transition services, student behavior, and transportation. The PWN reflects that the IEP team discussed Appendix A and Least Restrictive Environment (LRE), deciding to place the student in a Community Referenced Instruction (CRI) class where she would receive additional adult support provided daily by an instructional assistant.
11. While the PWN reflects the IEP team met for an annual review, the IEP reflects incorrect and insufficient information, identical data and IEP goals from the previous IEP, and a lack of parental input.
12. During the meeting, the team reviewed behavior charts, attendance records, assessments from 2023, and unique learning data. The PWN indicates that the parent expressed concerns about the student's behavior and challenges with her adjustment at school. The student exhibited behaviors such as biting, eloping, and pushing that posed risks to herself and others, impeding learning for both herself and her peers. Members of the IEP team reported that the student was provided with fidgets to help manage biting behaviors, but these interventions had not been successful. Additionally, a token rewards system had been implemented without success. It is noted that the student is highly motivated by food and becomes extremely aggressive when her desires are not met. The IEP does not reflect the student received an FBA and requires a BIP.
13. The PWN generated after this IEP team meeting does not reflect the discussion of ESY services, however, the IEP reflects the student meets the qualifications for ESY services and would participate in ESY during the summer of 2024.
14. There is no documentation of the IEP participants from the IEP meeting held on March 18, 2024, however, there is documentation that PGCPs received confirmation that an interpreter was requested and would participate in the IEP meeting.
15. On April 23, 2024, via email, the complainant's advocate requested a formal IEP meeting and waived their rights to a 10-day meeting notice.
16. On April 26, 2024, via email, the complainant requested an IEP meeting due to concerns about the "student missing school due to her behavior and the teachers calling her to inform her," and for the student not being able to go on field trips due to lack of support.
17. On May 8, 2024, via email, the complainant requested an IEP meeting.
18. On May 15, 2024, a PGCPs staff member responded to the complainant, requesting her availability dates for the meeting, and informing the complainant the school is available from June 3, 2024, to June 7, 2024.
19. On June 2, 2024, the complainant received a "Notice of IEP Team Meeting" to review and, if appropriate, revise the IEP, address the FBA and/or BIP, and review academic and behavioral progress and Least Restrictive Environment (LRE) for a meeting on June 10, 2024.

20. On June 10, 2024, the IEP team convened to discuss the student's progress at the request of the parent, and to address an MSDE complaint. During the meeting, the IEP team reviewed the student's academic and behavioral progress, discussed parent concerns, reviewed services outlined in the IEP, and addressed the need for additional adult support. The team also addressed the resolution of the state complaint, the parent's placement request, and considerations for a continuum of services. The PWN reflects that the IEP team discussed possible placement options due to the nature of the student's disability and to address her lack of academic and behavioral progress. The IEP team agreed to submit a Central IEP (CIEP) referral for further consideration. The PGCPS IEP team informed the complainant that the student currently receives additional adult support as required by the IEP and is eligible for ESY services; however, they noted that staffing for ESY is not guaranteed to be consistent with the school year.

The PWN reflects the parent's concern regarding the IEP and PWN not being provided to her in her native language, to which PGCPS acknowledged that the delay in providing translated documents was excessive. The IEP team also addressed concerns about the student's removal from school, specifying that unless the student is being suspended, the school should not text or call the parent to pick her up early due to behavioral reasons. The PWN reflects there was considerable discussion during the meeting regarding the number of times the student had been picked up voluntarily by the parent or the staff requested the student be picked up. The school team stated it was impossible to determine how frequently the parent was asked to pick the student up due to improper use of protocols for signing the student out.

Furthermore, the PWN reflects that the IEP team discussed concerns about the student's elopement from class, noting that she requires several staff members to support her when she attempts to elope. They also discussed the continuum of services and support available within PGCPS, including potential placement in a regional school or special education program where her interactions with non-disabled peers would be limited.

21. There is no documentation that the parent raised concerns about the need for a dedicated aide throughout the school year.
22. The report of the student's progress dated November 22, 2023, and April 12, 2024, towards the achievement of the annual written language expression goal reflects that the student is "Not making sufficient progress to meet the goal." There is no documentation the IEP team met to discuss the lack of progress toward the achievement of the annual written language goal during the November 27, 2023 IEP meeting.
23. The report of the student's progress dated February 9, 2024, towards the achievement of the annual self-management goal reflects that the student is "Not making sufficient progress to meet the goal." There is no documentation the IEP team met to discuss the lack of progress toward the achievement of the annual self-management goals.
24. The report of the student's progress dated April 12, 2024, towards the achievement of the annual reading vocabulary and math problem goals reflects that the student is "Not making sufficient progress to meet the goal." There is no documentation the IEP team met to discuss the lack of progress towards the achievement of the annual reading vocabulary and math problem goals.

25. On November 20, 2023, January 25, 2024, and April 27, 2024, the complainant was informed that the school would be going on a field trip, and due to safety concerns and the lack of available support, the student would not be able to attend.
26. There is no suspension documentation for the student since the beginning of the 2023-2024 school year.
27. There is documentation that the complainant received the March 18, 2024, IEP via email on June 13, 2024, and that the documents were translated into the complainant's native language.
28. During the 2023-2024 school year, the student was absent from school for 59.5 days.
29. There is no documentation that the student received special education instruction, supplementary aids and services, accommodations, and all of the student's related services as required by the IEP during the 2023-2024 school year.
30. There is no documentation the student received the recommended consultations from an OT, the PGCPs Behavior Team, or the PGCPs Autism Team per the IEP team's recommendations on November 27, 2023.

DISCUSSIONS AND CONCLUSIONS:

ALLEGATION #1 PROVISION OF SPECIAL EDUCATION INSTRUCTION, ACCOMMODATIONS, AND RELATED SERVICES

In this complaint, the complainant alleges that the PGCPs school team did not allow the student to participate in school trips due to "safety concerns" or a "lack of support" and was also requested to pick the student up from school due to her behavior.

IDEA mandates that schools provide FAPE, including necessary accommodations and supports for students with disabilities to participate fully in their educational program and FAPE must be available to all children with disabilities (34 CFR § 300.101(a)).

The public agency is required to ensure that the student is provided with the special education and related services required by the IEP (34 CFR §300.101).

Based on the Finding of Fact #1 through #4, #8, #22 through #25, and #29, MSDE finds that the PGCPs has not ensured that the student has been provided with the special education instruction, accommodations, and related services required by the IEP since the start of the 2023-2024 school year, in accordance with 34 CFR §§300.101 and .323. Therefore, this office finds that a violation occurred concerning this allegation.

ALLEGATION #2 ESY DETERMINATION

Based on the Finding of Fact #9, #13, and #20, MSDE finds that the PGCPs did consider the student's need for ESY services since June 2023, in accordance with 34 CFR §300.106, COMAR 13A.05.01.07B(2) and COMAR 13A.05.01.08B(2). Therefore, this office finds that a violation did not occur concerning this allegation.

ALLEGATION #3 ADDRESS PARENT CONCERNS

Based on the Finding of Fact #5, #7, #10, #20, and #21, MSDE finds that the parent did not raise concerns regarding the need for a dedicated aide; however, PGCPs did ensure that the IEP team addressed a need for additional support and or a dedicated aide at the September 26, 2023, November 27, 2023, and June 10, 2024 IEP team meetings, in accordance with 34 CFR §300.324. Therefore, this office finds that a violation did not occur concerning this allegation.

Based on the Finding of Fact #4, #7 #10, #12, #16, #19, and #20, MSDE finds that the PGCPs did ensure that the IEP team addressed the parent's concerns regarding the student's behavior since the start of the 2023-2024 school year, in accordance with 34 CFR §300.324. Therefore, this office finds that a violation did not occur concerning this allegation.

ALLEGATION #4 PLACEMENT DETERMINATION

In this case, the complainant alleges that she requested another placement due to the lack of support she believed the student was receiving in the current school.

In determining the educational placement of a student with a disability, the public agency must ensure that the placement decision is made by the IEP Team. The placement decision must be made in conformity with the least restrictive environment (LRE) provisions, determined at least annually, based on the student's IEP, and as close as possible to the student's home (34 CFR § 300.116 and COMAR 13A.05.01.10C(1)).

Based on the Finding of Fact #5, #7, #20, MSDE finds that the PGCPs did not follow proper procedures when determining the student's educational placement for the 2023-2024 school year, in accordance with 34 CFR §§300.114 -.116 and .321. Therefore, this office finds that a violation occurred concerning this allegation.

ALLEGATION #5 IEP MEETING PARTICIPANTS

The IEP team must include the student's parent, at least one regular education teacher of the student if the student is, or maybe, participating in the regular education environment, at least one special education teacher of the student, a representative of the public agency who is qualified to provide or supervise the provision of specially designed instruction, is knowledgeable about the general education curriculum, and about the availability of resources of the public agency, an individual who can interpret the instructional implication of evaluation results, at the discretion of the parent or public agency, other individuals who have knowledge or special expertise regarding the student, including related services personnel, as appropriate, and the student when appropriate (34 CFR §300.321).

Based on the Finding of Fact #14, MSDE finds that the PGCPs did not ensure that the IEP team meeting convened in March 2024, included the required participants, in accordance with 34 CFR §300.321. Therefore, this office finds that a violation occurred concerning this allegation.

ALLEGATION #6 ADDRESSING THE LACK OF EXPECTED PROGRESS

It is the public agency’s responsibility to ensure that the IEP team reviews the student’s IEP to address any lack of expected progress toward the annual goals (34 CFR §300.324).

Based on the Finding of Fact #22 through #24, MSDE finds that the PGCPs has not ensured that the student’s IEP was reviewed and revised to address his lack of expected progress toward achieving the IEP goals since the start of the 2022-2023 school year, in accordance with 34 CFR §300.324. Therefore, this office finds that a violation occurred concerning this allegation.

ADDITIONAL VIOLATION IDENTIFIED DURING THE COURSE OF THE INVESTIGATION

IEP DEVELOPMENT AND WRITTEN CLEARLY

The public agency must ensure that the IEP contains clear and accurate statements of the parental input and the PLAAFP (34 CFR §§300.320).

Based upon the Finding of Fact #11, MSDE finds that the PGCPs did not ensure that the IEP contains an accurate and complete parental input statement and PLAAFP statements that reflects where the student is performing currently, in accordance with 34 CFR §§300.320. Therefore, this office finds that a violation occurred.

IEP DEVELOPMENT AND ANNUAL IEP GOALS

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 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 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 upon the Finding of Fact #11, MSDE finds that the PGCPs has not ensured that the IEP contains appropriate measurable goals that are not duplicated and designed to meet the child’s needs resulting from the child’s disability and in accordance with 34 CFR §300.320. Therefore, this office finds that a violation occurred.

ALLEGATION #7 INTERPRETER IN NATIVE LANGUAGE

In this case, PGCPs confirmed that an interpreter was requested for the meeting, however, there is no documentation that the interpreter was present at the March 18, 2024, IEP team meeting.

Based on Finding of Fact #14, MSDE finds that the PGCPs confirmed an interpreter in the complainant's native language. However, there is no documentation to demonstrate their presence during the IEP meeting in March 2024, in accordance with 34 CFR §300.322. Therefore, this office finds that a violation occurred concerning this allegation.

ALLEGATION #8 **PROVISION OF PWN**

The public agency is required to provide the parent of a student with a disability with written notice before proposing or refusing to initiate or change the identification, evaluation, or educational placement of the student or the provision of a FAPE to the student. This notice includes a description of the action proposed or refused, an explanation of the action, a description of each evaluation procedure, assessment, record, or report used as a basis for the decision, a statement that the parents of a student with a disability have protection under the procedural safeguards and the means by which a copy of the description of the safeguards can be obtained, sources for parents to contact to obtain assistance in the understanding the provisions, a description of other options that the IEP team considered and the reasons why those options were rejected, and a description of other factors that are relevant to the agency's proposal or refusal (34 CFR §300.503).

In addition, the prior written notice must be written in language understandable to the general public and be provided in the native language of the parent or other mode of communication used by the parent, unless it is clearly not feasible to do so (34 CFR §300.503(c)).

Based on the Finding of Fact #20 and #27, MSDE finds that the PGCPs did provide the parents with prior written notice of the IEP team's decisions from the IEP team meeting held in March 2024, in accordance with 34 CFR §300.503; however, the PGCPs acknowledged at the June 10, 2024, IEP team meeting that the time for the provision of the translated documents was excessive. Therefore, this office finds that a violation occurred concerning this allegation.

Notwithstanding the violation, MSDE finds that based on Finding of Fact #27 that the complainant received the PWN on June 13, 2024; therefore, no student corrective action is required.

ALLEGATION #9 **DISCIPLINARY REMOVAL**

The complainant alleges that the PGCPs school team called on numerous occasions for the complainant to "pick up" the student when they were unable to manage her behaviors. In the June 10, 2024, PWN, the IEP team acknowledges that the complainant was requested to pick the student up from school due to behavioral incidents; however, due to failure to document these removals and follow sign-out protocols, the IEP team was unable to determine how many times this occurred. Regardless of whether they were formally documented, these "pick ups" are removals for disciplinary reasons that should have been documented. Documentation of disciplinary removals are key to implementing the discipline procedures and protections afforded students with disabilities under the IDEA. Specifically, students with disabilities are entitled to additional protections (e.g., manifestation determination review and FAPE), when the disciplinary removals result in a change in placement. See COMAR 13A.08.03.

Based on the Findings of Fact #16, #20, and #26, MSDE finds that the student did have disciplinary removals during the 2023-2024 school year that, if properly documented, may have required PGCPs to follow proper procedures when disciplinarily removing the student from school during the 2023-2024 school year, in accordance with 34 CFR §§300.530 and .531, COMAR 13A.08.03, and COMAR 13A.05.01.10. Therefore, this office finds that a violation did occur concerning this allegation.

CORRECTIVE ACTIONS and TIMELINES:

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

MSDE has established reasonable time frames below to ensure that noncompliance is corrected in a timely manner.² This office will follow up with the public agency to ensure that it completes the required actions consistent with MSDE Special Education State Complaint Resolution Procedures.

If the public agency anticipates that any of the time frames below may not be met, or if either party seeks technical assistance, they should contact Ms. Alison Barmat, Branch Chief, Family Support and Dispute Resolution, MSDE, to ensure the effective implementation of the action.³ Ms. Alison Barmat can be reached at (410) 767-7770 or by email at alison.barmat@maryland.gov.

Student Specific

MSDE requires the PGCPs to provide documentation by August 30, 2024, that the IEP team has convened and determined the amount and nature of compensatory services or other remedy to redress the violations identified in this letter and develop a plan for the provision of those services within one year of the date of this Letter of Findings.

The PGCPs must ensure that the complainant is provided with written notice of the team's decisions. The complainant maintains the right to request mediation or to file a due process complaint to resolve any disagreement with the team's decisions

² The United States Department of Education, Office of Special Education Programs (OSEP) states that the public agency corrects noncompliance in a timely manner, which is as soon as possible, but not later than one (1) year from the date of identification of the noncompliance. The OSEP has indicated that, in some circumstances, providing the remedy could take more than one (1) year to complete. If noncompliance is not corrected in a timely manner, MSDE is required to provide technical assistance to the public agency, and take tiered enforcement action, involving progressive steps that could result in the redirecting, targeting, or withholding of funds, as appropriate.

³ MSDE will notify the public agency's Director of Special Education of any corrective action that has not been completed within the established timeframe.

School-Based

MSDE requires the PGCPs to provide documentation by August 30, 2024, of the steps taken to ensure that the violations do not recur at High Point High School. The documentation must include a description of how the PGCPs will evaluate the effectiveness of the steps taken and monitor to ensure that the violations do not recur.

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

c: Millard House II, Chief Executive Officer, PGCPs
Keith Marston, Compliance Instructional Supervisor, PGCPs
Lois Jones Smith, Compliance Liaison, PGCPs
Darnell Henderson, General Counsel, PGCPs
William Fields, Associate General Counsel, PGCPs
[REDACTED], [REDACTED], Principal, PGCPs
Alison Barmat, Branch Chief, Family Support and Dispute Resolution, MSDE
Dr. Paige Bradford, Section Chief, Performance Support and Technical Assistance, MSDE
Nicol Elliott, Section Chief, Monitoring and Accountability, MSDE
Tracy Givens, Section Chief, Dispute Resolution, MSDE
Stephanie James, Complaint Investigator, MSDE