

December 6, 2024

[REDACTED]
[REDACTED]
[REDACTED]

Ms. Trinell Bowman
Associate Superintendent of Special Education
John Carroll Center
1400 Nalley Terrace
Landover, Maryland 20785

RE: [REDACTED]
Reference: #25-092

Dear Parties:

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

ALLEGATIONS:

On October 9, 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) concerning the above-referenced student.

MSDE investigated the following allegations:

1. The PGCPS has not followed proper procedures when determining the student’s educational placement for the 2023-2024 and 2024-2025 school years, in accordance with 34 CFR §§ 300.116 and .321.
2. The PGCPS has not ensured that the Individualized Education Program (IEP) team addressed the parent’s concerns regarding the student’s academic, social-emotional behavioral, and IEP supports since October 2023, in accordance with 34 CFR § 300.324.
3. The PGCPS has not followed proper procedures when responding to a request for an IEP team meeting since October 2023, in accordance with 34 CFR § 300.503 and COMAR 13A.05.01.08.
4. The PGCPS did not ensure that the parent was provided with accessible copies of each document the IEP team planned to discuss at IEP team meetings at least five business days before the scheduled meeting since October 2023, in accordance with COMAR 13A.05.01.07.
5. The PGCPS did not follow proper procedures in responding to a request for a reevaluation since October 2023, in accordance with 34 CFR §§ 300.303 - .311, .503 and COMAR 13A.05.01.06.

6. The PGCPs did not follow proper procedures when disciplinarily removing the student from the school bus since October 2023, in accordance with 34 CFR §§ 300.530 and .531, COMAR 13A.08.03, and COMAR 13A.05.01.10.
7. The PGCPs has not ensured that the IEP team convened to review the student's IEP before October 2024, in order to ensure that the IEP was reviewed at least annually, in accordance with 34 CFR § 300.324.

BACKGROUND:

The student is 14 years old and is identified as a student with Emotional Disability (ED) under the IDEA. From August to November during the 2023-2024 school year the student attended [REDACTED] ([REDACTED]). The student was homeschooled from January 2024 to September 2024. In October 2024, the student enrolled at [REDACTED] ([REDACTED]). The student has an IEP that requires the provision of special education instruction and related services.

FINDINGS OF FACT:

1. In its written response, the PGCPs acknowledges that it has not followed proper procedures when determining the student's educational placement for the 2023-2024 school year, in accordance with 34 CFR §§ 300.116 and .321.
2. On August 29, 2023, the complainant was emailed an invitation for an August 30, 2023, meeting, a copy of the procedural safeguards and habilitative rights.
3. The IEP in effect for the student in October 2023, was developed on May 12, 2023, by MCPS. The IEP reflects the student's primary disability as ED, with math calculation, reading comprehension, written language content, self-management, and social-emotional/behavioral as the areas affected by the disability. The IEP reflects that the projected annual review date for the IEP is May 11, 2024, and the student's most recent evaluation date was April 22, 2022. Continued evaluation eligibility data reflects that new psychological and educational assessments were recommended for the student in March 2023. The eligibility data further reflects that the student meets the criteria for ED "due to needs with reading, writing, [mathematics], self-management, compliance, emotional regulation, and social skills."

Present Level of Academic Achievement and Functional Performance (PLAAFP) data reflects the student as performing on the following instructional grade levels:

- Reading Comprehension – third grade;
- Math Calculation – third grade;
- Written language content – fourth grade;
- Social emotional/behavioral - below age expectancy; and
- Self-management – below same age peers.

The IEP reflects that the student has a Behavior Intervention Plan (BIP) dated December 1, 2021.

The IEP requires the following instructional and assessment accommodations:

- General administration directions read aloud and repeated as needed;
- Redirect student;
- Graphic organizer;
- Separate or alternate location;
- Reduce distractions to self;
- Reduce distractions to others;

- Paper-based edition;
- Notes and outlines; and
- Extended time (1.5x).

The IEP requires the following supplementary aids, services, program modifications, and supports:

- Use of word bank to reinforce vocabulary and/or when extended writing is required;
- Repetition of directions, daily;
- Monitor independent work, daily;
- Frequent and/or immediate feedback, daily;
- Check for understanding, daily;
- Use pictures to support reading passages, whenever possible, daily;
- Break down assignments into smaller units, daily;
- Check for understanding (social/behavioral supports), daily;
- Social skills training, weekly;
- Access to trusted adult, daily;
- Frequent reminder of rules, daily;
- Use of positive/concrete reinforcers, daily;
- Encourage/reinforce appropriate behavior in academic and non-academic settings, daily;
- Encourage student to ask for assistance when needed, daily; and
- Alternative location to complete work, daily.

The IEP reflects that the student was not eligible for Extended School Year (ESY) services.

The IEP required the following goals:

- Math calculation: "Given adult support, small group instruction, scaffolding of instruction, visual aids, manipulatives, a calculation device, prompts, redirections, positive reinforcement for positive behavior, frequent reminders of the rules and expectations and grade level mathematics problems [the student] will be able to solve for unknown numbers in algebraic equations."
 - Method of Measurement: Informal Procedures: student work samples
Criteria (Mastery and Retention) With: 75 % Accuracy

This goal is not measurable as written because the criterion for retention is not included in the goal.

- Reading Comprehension: "Given a small group setting, direct instruction, scaffolding of reading assignments, graphic organizers, prompts, redirections, positive reinforcement for positive behavior, frequent reminders of the rules and expectation and grade level reading texts [the student] will be able to comprehend what he has read in order to summarize what he has read."
 - Method of Measurement: Informal Procedures: student work samples
Criteria (Mastery and Retention) With: 4 out of 5 trials

This goal is not measurable as written because the criterion for mastering the goal is not included in the goal. It is not clear whether the student will do this 100% of the time on 4 out of 5 trials, or 50% of the time on 4 out of 5 trials, or some other measure.

- Social Emotional/Behavioral: "Given adult support, access to problem solving, a menu of coping strategies, frequent reminders of the rules and expectations, check-ins, positive reinforcement for positive behavior, opportunities to take breaks. and opportunities to practice [the student] will be able to regulate his emotions throughout the school day in order to attend all of his classes."

- Method of Measurement: Other: Behavioral Data chart
- Criteria (Mastery and Retention) With: 4 out of 5 trials
- Social Emotional/Behavioral: "Given adult support, access to problem solving, modeling, social skills instruction, small group instruction, positive reinforcement for positive behaviors, frequent reminders of the rules and expectations and opportunities to practice [the student] will be able to interact safely with peers and staff throughout the school day in all settings."
 - Method of Measurement: Observation Record
 - Criteria (Mastery and Retention) With: 75 % Accuracy

This goal is not measurable as written because the criterion for mastering the goal is not appropriate. The safe interactions with peers and staff cannot be measured by accuracy.

- Written Language Content: "Given adult support, direct instruction, scaffolding of writing assignments, graphic organizers, prompts, redirections, modeling, a word bank, positive reinforcement for positive behaviors, frequent and immediate feedback, reminders about the rules and expectations, and grade level writing prompts [the student] will be able to plan, organize, and create written work with correct spelling, grammar and punctuation."
 - Method of Measurement: Informal Procedures: student work samples
 - Criteria (Mastery and Retention) With: 4 out of 5 trials

This goal is not measurable as written because the criterion for mastering the goal is not included in the goal. It is not clear whether the student will do this 100% of the time on 4 out of 5 trials, or 50% of the time on 4 out of 5 trials, or some other measure.

- Self-management: "Given frequent reminders of classroom expectations, structured breaks, adult support, strategies for sustaining attention, a safe space to problem solve, prompts, redirections, positive reinforcement for positive behavior, modeling and timers [the student] will start and complete all assigned tasks throughout the school day."
 - Method of Measurement: Informal Procedures: teacher observation; data collection sheet
 - Criteria (Mastery and Retention) With: 4 out of 5 trials

The IEP required the following special education services:

- 30, 45-minute sessions of classroom instruction inside general education, weekly;
- Five, 45-minute session of classroom instruction outside general education, weekly; and
- Four, 15-minute sessions of classroom instruction outside general education, monthly.
- "[The student] will receive instruction in co-taught/supported general education classes for all core subjects (math, science, world studies and English)."
- "[The student] will receive direct instruction and supports in a self-contained resource class for 90 [minutes] every other day."

The student's least restrictive environment (LRE) was inside general education 80% or more of the school day. "[The student] will be removed from the general education setting due to his emotional, behavioral, and academic needs. The supports he requires to access his learning are not offered in the general education [setting]. [The student's] needs require specialized supports and instruction that cannot be provided directly in a general education setting. [The student] will participate with his non-disabled peers to the greatest extent possible, he will receive academic interventions in small group setting outside of general education."

4. The BIP in effect for the student in October 2023 was developed in October 2021 and was last updated on April 22, 2022. The BIP reflects “the student displays a pattern of repeated and frequent challenging behavior (e.g., aggression, biting, property destruction, elopement). [The student’s] disengagement with schoolwork has limited his ability to demonstrate progress. Even with one-to-one support, he will fall asleep, walk out of class, play video games when asked to comply with tasks in classes.”

The BIP included the following targeted behaviors:

- Compliance; and
- Negative interactions with peers.
- Staying awake and engaged in class (head up, and eyes on speaker);
 - This behavior was not addressed in the BIP but was instead addressed “through a schedule that...included a shift in [the student’s] academic periods to later in day and inclusion of more preferred class at the beginning of [the student’s] day to mitigate the academic fatigue.”

The following preventive strategies were included in the BIP to address the targeted behaviors:

- Compliance:
 - Provide a checklist of tasks to do;
 - Visual reminder of classroom expectations; and
 - Wait time before giving additional [redirection] (provide 1 reminder and then give time to respond).
- Negative interactions with peers:
 - Daily check in with trusted adults;
 - Modeling/role playing;
 - Social stories.

The following teaching strategies were included in the BIP to address the targeted behaviors:

- Compliance replacement behavior:
 - “[The student] will respond to adult directives/feedback without being argumentative.”
 - “Outside of the classroom, [the student] needs instruction on how to appropriately reply to adult directives/feedback. [The student] can be asked to participate in deciding how adult directives/feedback can be given (verbally or visual checklist).”
- Negative interactions with peers' replacement behavior:
 - “[The student] will receive positive praise and feedback whenever he has positive peer interaction.”
 - “Direct instruction on good vs. bad attention; social stories- being a good friend; how words/actions affect others.”

The following response strategies were included in the BIP to address the targeted behaviors:

- Compliance:
 - Planned ignoring after providing a directive with wait time to respond;
 - Provide positive reinforcements to peers who are complying; and
 - Provide positive reinforcements for any acceptable classroom behaviors – reminders of good/bad attention.
- Negative interactions with peers:
 - Reminders of acceptable words/actions using signal words (“use kind words,” “use safe hands”); and
 - Use calm voice and tone (modeling).

5. On August 30, 2023, the IEP team at [REDACTED] met “to review the [student’s] IEP to determine comparable services and to discuss and determine whether a change in placement is needed at this time.”

The PWN reflects that the IEP team reviewed the student’s IEP, FBA/BIP, manifestation document, teachers input, and review of services to make this determination. There is no documentation that shows the complainant received these documents five days prior to the IEP meeting.

The “notice for individualized education program (IEP) team meeting” for this meeting is dated September 24, 2023. The meeting invitation participants included the [REDACTED] instructional specialist, special education teacher, the complainant, the assistant principal, and the IEP case manager. There is no regular education teacher listed in the IEP meeting invitation. The meeting sign-in sheet does not reflect that a regular education teacher attended the IEP meeting.

The prior written notice (PWN) for this meeting is dated September 6, 2024.

6. On August 30, 2024, the IEP was amended and reflected that the student’s new residence and service county as Prince George’s County and the service school as [REDACTED]. The instructional and assessment accommodations, behavior intervention information, supplementary aids, services, program modifications, and supports, ESY determination, IEP goals, and LRE required by the IEP continued. The dates of provision for the special education services were updated to August 28, 2023, through May 11, 2024.

The IEP amendment date was September 7, 2023.

7. On September 21, 2023, the IEP was amended. The amended IEP reflects that the PLAAFP parental input data from August 2023 was removed. The other PLAAFP data, instructional and assessment accommodations, behavior intervention information, supplementary aids, services, program modifications, and supports, ESY determination, IEP goals, special education services, and LRE required by the IEP continued.

There is no documentation reflecting that an IEP team meeting was held to make this amendment, nor is there any evidence of parental permission to amend the IEP without meeting.

8. On September 26, 2023, [REDACTED] staff emailed [REDACTED] administration sharing that the student had been “processed” and “once [his IEP was amended] to add transportation [the student could] register at [REDACTED].”
9. On September 26, 2023, the IEP was amended. The amended IEP reflects that the PLAAFP parental input data from August 2023 was placed back into the IEP and the academic PLAAFP data continued. The instructional and assessment accommodations, behavior intervention information, supplementary aids, services, program modifications, and supports, ESY determination, IEP goals, and LRE required by the IEP continued.

The special education services required by the IEP were updated to include transportation as a related service from August 28, 2023, to May 11, 2024. “The IEP Team discussed that [the student] will receive transportation as a related service from 8/28/2023 to 5/11/2024 to and from [REDACTED] in order to receive services that are not at his boundary school.”

There is no documentation reflecting that an IEP team meeting was held to make this amendment, nor is there any evidence of parental permission to amend the IEP without meeting.

10. There is documentation of a "Notification of Student's Suspension" dated October 4, 2023, that reflects the student was suspended for six days from October 5, 2023, to October 16, 2023. The "Guidance/Administrative/Disciplinary Procedures" utilized prior to the suspension included the following:

- Teacher/student conference;
- Teacher/parent conference;
- Teacher/administrator conference;
- Counselor/student conference;
- Administrator/student conference;
- Administrator/parent conference;
- Student program adjustment
- Referral to student services;
- Student services/student/parent conference; and
- Temporary removal from class.

The notification reflects that the parent/guardian was provided a copy of the procedural safeguards.

11. On October 5, 2023, the [REDACTED] staff emailed the complainant a copy of the October 4, 2023, suspension notice and the Maryland Procedural Safeguards notice. The email states that a "conference" would be held on October 9, 2023.

12. On October 9, 2023, the IEP team reconvened to review the IEP and discuss the student's placement. The PWN reflects "[REDACTED] will implement the following plan to assist [the student] while he is attending [REDACTED]":

- "Check-in with [a student advocate];
- Review of school expectation[s];
- Schedule time with the school therapist (8th grade counselor made referral for therapist);
- Scheduled time with a designated staff member; and
- Continued implementation of [the student's] FBA/BIP."

The PWN reflects the assistant principal reported that the team would follow "PGCPS guidelines for dealing with [the student's] behaviors."

The IEP team reviewed parent input, previous psychological and educational assessments, instructional specialist input and recommendation, input from general and special education teachers, and an incident report in making its determinations. There is no documentation that shows the complainant received these documents five days prior to the IEP meeting.

The IEP was not amended to reflect the inclusion of these supports.

13. The November 1, 2023, the report of the student's progress toward achieving the student's social emotional/behavioral emotional regulation IEP goal reflects the student was making sufficient progress to meet the goal: "[The student] is making progress with his ability to [sic] plan, organize, and create written work with correct spelling, grammar and punctuation. He continues to be inconsistent with his objective goals. 4th quarter." The student's progress toward achieving the IEP goal is not reported as required by the IEP.

14. On November 1, 2023, [REDACTED] staff received a copy of the student's attendance report in an email entitled "Meeting data from [the student] on November 1, 2023." There is no documentation that the document was sent to the complainant.

15. On November 2, 2023, the IEP team reconvened to discuss “the educational choices for [the student] to address his IEP.” The PWN reflects the student “got into a physical altercation” prior to the meeting.

The PWN reflects the IEP team reviewed parental input, previous psychological and educational assessments, and IEP services. There is no documentation that the complainant received these documents five days before the IEP meeting.

The PWN generated after the meeting is dated November 6, 2023.

16. On November 3, 2023, the complainant’s wife emailed [REDACTED] staff requesting written documentation of information shared with the complainant and his wife, and what decisions had been made in the student’s regard. The email requested a written explanation of why [REDACTED] was denying the complainant an IEP meeting and why the student could not be reevaluated at the complainant’s request “...due to certain changes and or circumstances and concerns.” The email also requested an explanation as to why teachers never communicated during the previously held meetings, and requested written documentation of the “rules, regulations, and requirements” regarding how “[REDACTED]” does things very differently regarding the IEP.”
17. On November 6, 2023, a PGCPs email reflects [REDACTED] staff sharing the complainant’s November 3, 2023, request. In the email, [REDACTED] staff shared that the complainant had never requested an IEP meeting. The email also stated that the complainant never requested assessment. The complainant never mentioned changes in the student’s behavior to the special education department until November 3, 2023, when [REDACTED] staff contacted the complainant regarding the November 2, 2023, meeting. At that time, it was suggested that the complainant share that information with the student’s therapist. The email states that the student refused therapy services from [REDACTED] staff on October 30, 2023. The email states that teachers had been in daily contact with the complainant regarding the student’s behaviors “which [have] interfered with his academic progress.” “In every meeting [except the November 2, 2023, meeting] teachers were present, and the family was asked if they had any questions none was directed towards any teacher.” At the October 16, 2023, reentry meeting the complainant’s wife asked a question to which the special educator provided input. The email also stated that [REDACTED] acknowledged to the complainant’s wife “the reason for every meeting...held with the family a prior written notice was provided as well as the parent rights and [responsibilities] in writing (emailed and at the Reentry Meeting).”
18. On November 6, 2023, PGCPs Central Office staff emailed [REDACTED] staff sharing the steps to be taken regarding the November 3, 2023, email from the complainant’s wife.
19. The November 9, 2023, report of the student’s progress toward achieving the student’s IEP goals is as follows:
- Reading Comprehension: Not making sufficient progress to meet goal (IEP team needs to meet to address insufficient progress). “[The student] is not making sufficient progress to meet his goal due to his behavior. [The student] has difficulty following directives and is constantly redirected. His poor attendance in the classroom has hindered his work samples for assessment.”
 - The student’s progress toward achieving the IEP goal is not reported as required by the IEP.

- Math Calculation: Not making sufficient progress to meet goal (IEP team needs to meet to address insufficient progress). “[The student] is not making progress to meet his goal. [The student’s] behavior is hindering his progress for advancement. His attendance has also been a hinderance for classroom samples.”
 - The student’s progress toward achieving the IEP goal is not reported as required by the IEP.
 - Self-Management: Not making sufficient progress to meet goal (IEP team needs to meet to address insufficient progress). “[The student] has not progressed to meet his goal. Given the adult support and services, [the student] continues to struggle to maintain control of his emotions. Due to his behavior and control factor, samples of his classwork [have] been difficult. He has tried on numerous occasions to complete classwork samples for assessment, but it would get lost.”
 - The student’s progress toward achieving the IEP goal is not reported as required by the IEP.
 - Written Language Content: Not making sufficient progress to meet goal (IEP team needs to meet to address insufficient progress). “[The student] is not making sufficient progress to meet his goal. [The student’s] behavior has hindered his progress. [The student’s] attendance in his classes has also been a deterrent for obtaining samples of classroom work for assessment.”
 - The student’s progress toward achieving the IEP goal is not reported as required by the IEP.
 - Social Emotional/Behavioral (Emotional Regulation): Not making sufficient progress to meet goal (IEP team needs to meet to address insufficient progress). “[The student] is not meeting his goal. He has not been able to remain in his class to obtain any samples of class work. He does need adult support to help him maintain his anger and frustration. [The student] has chosen an IEP facilitator and Security advisor to help him regain his emotions. This is helping toward his goal.”
 - The student’s progress toward achieving the IEP goal is not reported as required by the IEP.
 - Social Emotional/Behavioral (Safe Interactions): Making sufficient progress to meet goal. “[The student] is unable to meet his goal due to behavior and attendance.”
 - The student’s progress toward achieving the IEP goal is not reported as required by the IEP.
20. On November 10, 2023, [REDACTED] staff emailed the complainant requesting an opportunity to meet on November 15, 2023. The email reflects the purpose of the meeting was to address the complainant’s request to assess the student. The email states that the meeting is “expedited,” and the complainant’s permission is required before moving forward with scheduling.
21. On November 11, 2023, the complainant emailed his permission for [REDACTED] staff to move forward with scheduling an expedited meeting.
22. On November 12, 2023, [REDACTED] staff emailed a meeting invitation for a reevaluation meeting to be held on November 15, 2023.

23. On November 14, 2023, [REDACTED] staff emailed PGCPs Office of Special Education staff regarding two behavioral incidents for the student where he threatened a teacher and got into a physical altercation with another student. The email reflected that if the student were suspended or placed in the "Academic Learning Center" he would be "over the 10 days and a manifestation meeting will need to be held."
24. On November 14, 2023, [REDACTED] staff emailed the complainant. The email included an IEP meeting invitation for November 15, 2023, the Procedural Safeguards and Habilitative Services Guide.
25. On November 15, 2023, the IEP team reconvened "as part of a reevaluation meeting requested by [the complainant's wife]. The PWN reflects the team reviewed the student's psychological assessment reports from February 2021 and May 2022, and educational assessments from May 2021 and April 2022. Based on the assessment review, the [REDACTED] team reported that no new assessments were needed concerning the student's academic and cognitive abilities. The team "did not question the change in the disability code of emotional disability" as "the student still exhibits the behaviors of a student with an emotional disability." The team determined that an updated FBA and BIP should be completed. The complainant shared his consideration of homeschooling the student with the team. The PWN reflects the complainant was provided with information about homeschooling a student in PGCPs.

The IEP team considered the reevaluation reports from 2021 and 2022, and the psychological reports from 2021 and 2022, a progress report, and "teacher report – running record of [the student's] incidents." There is no documentation that the complainant received these documents five days before the IEP meeting.

The PWN generated after the meeting is dated November 17, 2023.

There is no documentation that the IEP team discussed the student's lack of progress during this meeting.

26. The "Notice and Consent for Assessment" dated November 15, 2023, reflects an FBA/BIP would be conducted for the student.
27. On November 20, 2023, the IEP team held a manifestation determination meeting for the student.¹ The purpose of the meeting was to "determine whether the conduct, which resulted in a disciplinary action, was or was not a manifestation of the student's disability." The "Summary of Individualized Education Program (IEP) Team Meeting" reflects that the parent/guardian of the student was provided with the "Procedural Rights Parental Safeguards" document on October 19, 2023. The discipline information/data considered by the IEP team reflects that the date of the incident and removal was November 14, 2023, and the proposed date of return was November 17, 2023. The documentation reflects that "[the student] got into a physical altercation with another student inside the classroom (homeroom/math)."

The summary reflects that the IEP team reviewed the discipline and attendance records, and the student was already suspended for six days during the current school year and had not received IEP services for those six days. The summary also reflects that the student received five days of in-school suspension for the current school year and had received IEP services for those five days. Other disciplinary actions taken in the student's regard reflect "[the student] has spent time in the Special Education Office away from his

¹ Based on documentation from November 21, 2023, MSDE has determined that the actual date for this meeting was November 21, 2023, and the date of November 20, 2023, is a clerical error.

peers, [the student] was allowed time to calm down, problem-solve with the IEP Facilitator, and take a break which sometimes resulted in [the student] falling asleep in the bean bag.”

The summary reflects the student had a “series of removals” that accumulated to more than 10 school days in the school year. The documentation reflects the dates of the removals were as follows:

- September 23, 2023, for six days;
- October 3, 2023, for one day;
- November 6, 2023, for two days; and
- November 14, 2023, for three days.

The student was suspended and removed from school for 12 days. The documentation does not include the six days the student was suspended from October 5, 2023, to October 16, 2023. In total, the documentation reflects the student was suspended for 18 days from September to November 2023.

The summary reflects the student exhibited verbal aggression, physical aggression, noncompliance, and work refusal toward adults and peers. The student was also observed to exhibit “impulsive control, attention/focus, and the regulation of his emotions” during the school day.

The student's cumulative removals constitute a change in placement.

The services determined by school personnel prior to the IEP team meeting to determine program placement and to address free appropriate public education (FAPE) during removal included the following:

- Three, 30-minute sessions of reading in the in-school-suspension (ISS)/special education (SPED) office; and
- One, 30-minute session of counseling in the therapist’s office.

The summary reflects that the academic and counseling services offered to the student in the Alternative Learning Center (ALC) (ISS-In School Suspension) were refused by the student.

Relevant information considered by the IEP team to determine whether the student’s behavior was a manifestation of the student's disability included the following:

- “[The student] has academic goals which [cover] reading comprehension, math calculation, [and] written language content. [The student] has two social-emotional goals.”
- The IEP team determined that the student’s IEP addressed his “current/relevant” behavioral concerns;
- A Functional Behavior Assessment (FBA) had not been conducted;
- A Behavior Intervention Plan (BIP) was not in place;
- The BIP did not address all relevant/critical behaviors; and
- The additional behaviors/needs require additional assessment or planning.
- “[The student’s] social-emotional needs are not being managed with fidelity at this time. Additional training is needed to teach [the student] the acceptable behaviors at school. Services identified and needed in his IEP include role-playing, problem-solving, anger management, and social skills group. [The complainant] was informed by [REDACTED] that [the student’s] IEP was not being implemented because they could not provide the services listed in his IEP. [The complainant] refused to enroll [the student] in the [REDACTED] program at [REDACTED].”

The assessment data reviewed by the IEP team included:

- The Woodcock-Johnson IV administered on April 1, 2022;
- The Woodcock-Johnson IV administered on December 16, 2020; and
- The Behavior Assessment System for Children, Third Edition (BASC-3) administered on May 4, 2023.

The team determined that an updated FBA/BIP was needed. The discussion to support the IEP team's decision reflects the student received assessments in the MCPS system in 2021, and his FBA/BIP were updated in 2022. "The [REDACTED] school psychologist recommended that an updated FBA/BIP [should be] completed by the IEP team." The IEP team also considered teacher and parental input.

The IEP team determined that the student's behavior during the incident that occurred on November 14, 2023, "was caused by, or had a direct and substantial relationship to, the child's disability" and the behavior was a direct result of the school's failure to implement the IEP. The basis for this decision reflects "the IEP [team] discussed whether [the student's] behavior was a result of his disability based on the definition provided by the school psychologist, from the PGCPs Procedure Manual, a student with an emotional disability is defined as a condition exhibiting one or more of the following characteristics over a long period and to a marked degree, that adversely affects a student's educational performance."

The summary of actions proposed by the IEP team based on the information considered included the following:

- The behavior was a manifestation of the student's disability, and "the student must return to the placement from which he or she was removed [by November 17, 2023]." [REDACTED] [continued] to stress that [the student's] IEP social emotional needs cannot be met at [REDACTED]."
- An FBA should be conducted, and "the IEP team was keeping antidotal [sic] record" to be completed by December 20, 2023.
- "[The IEP team should] develop and implement a BIP to address the current behavior. The BIP will be provided to the student's teachers by the case manager. Antidotal [sic] records will be used to write the FBA/BIP" to be completed by December 20, 2023.

The document basis for this decision reflects the IEP team held a reevaluation meeting on November 2, 2023, and agreed that the FBA/BIP would be completed.

The IEP team participants for the meeting included the following:

- Psychologist
- IEP Facilitator
- Assistant Principal
- Instructional Specialist
- Special Education Teacher
- General Education Teacher
- Other Participant
- Other Participant
- Other Participant

28. On November 21, 2023, the complainant's wife emailed [REDACTED] staff requesting all documentation and "everything in writing from all meetings." The email requested a written explanation why "certain updates were not given to the parent in a timely manner" and why there was a lack of communication from the school. The email states that this information was requested a month prior.

29. On November 21, 2023, [REDACTED] staff emailed the complainant with information that the student had been withdrawn from [REDACTED] and a manifestation meeting would be held on November 21, 2023, to discuss the student's most recent suspension.
30. On November 21, 2023, [REDACTED] staff emailed the complainant the PWNs from the September 30, 2023, October 9, 2023, November 2, 2023, and November 15, 2023, IEP meetings.
31. On November 22, 2023, [REDACTED] staff emailed the complainant's wife stating that all PWNs were sent to the complainant after every "conference" that has taken place, and all notices were compiled and sent to the complainant on November 21, 2023.
32. On November 22, 2023, the complainant's wife emailed [REDACTED] staff stating that the complainant did not receive the PWNs from October 9, 2023, and November 6, 2023, IEP team meetings until November 21, 2023.
33. On November 22, 2023, the complainant's wife emailed [REDACTED] staff sharing concerns regarding holding an IEP meeting and contradictions in statements made regarding holding an IEP meeting.
34. On November 23, 2023, the complainant's wife emailed [REDACTED] staff sharing that no teachers shared any progress or concerns they had about the student during the first two to three meetings, but BLMS staff shared that the teachers "introduced themselves" to this concern. The email also stated that the complainant was denied an IEP meeting because he was told that since [REDACTED] could not hold not service the student's IEP an IEP meeting could not be convened. However, the complainant was later told that all of the meetings were IEP meetings, and this caused confusion. The email expressed that the November 17, 2023, meeting was the only meeting where the [REDACTED] staff "read things from the IEP documents/assessment documents" and a teacher shared information.
35. On November 23, 2023, [REDACTED] staff emailed the complainant a notice for consent of assessment.
36. On November 23, 2023, the student's IEP was amended. The amended IEP reflects an exit date of November 21, 2023, "Exit Category: F – Moved, known to be continuing."
37. On November 27, 2023, the [REDACTED] staff member emailed [REDACTED] administration and PGCPs Office of Special Education staff sharing that the IEP meeting reviewing comparable service and placement for the student was held "no more than 3 days after the student's enrollment at [REDACTED]" and teachers had no information to share. The teachers introduced themselves at every meeting and the family could have asked the teachers questions, including at the student's manifestation meeting. The staff member stated that she apologized to the complainant's wife due to her concern that she may have felt like teachers were being stopped from "sharing or speaking at the meeting." The email states that the complainant did not request an IEP meeting other than the reevaluation meeting that took place on November 15, 2023, and the purpose for each meeting was shared at the beginning of the meetings after the staff introductions.
38. On November 29, 2023, the [REDACTED] staff emailed the PGCPs Central Office staff sharing that the complainant completed the "Home Schooling Packet as well as the Virtual Academy Packet."
39. On December 4, 2023, [REDACTED] staff emailed the complainant providing the contact information for the coordinator for homeschool and sharing that his request to speak with the virtual academy supervisor would also be sent. The email also reflects that the complainant would receive other resources.

40. On December 19, 2023, the complainant's wife emailed [REDACTED] staff requesting an explanation regarding why teacher input only occurred in the most recent IEP meeting.
41. On December 20, 2023, [REDACTED] staff forwarded the December 19, 2023, email from the complainant's wife to PGCPs central office and administrative staff sharing that she had no contact with the complainant's wife, and all communication with the complainant was documented in "Maryland On-line". The email states that the last entry in the log reflects that the complainant picked the withdrawal packet up from [REDACTED] along with the consent for assessment for an FBA/BIP for the student.

There is no documentation of a parent contact log in Maryland On-Line for this student.

42. On January 3, 2024, a "SY 24 Endorsed Home School Notification Form" for the student was sent to [REDACTED] staff.
43. On October 11, 2024, the student enrolled at [REDACTED].
44. On October 31, 2024, the IEP team at [REDACTED] convened to review the student's IEP. The PWN reflects the team proposed to review the student's IEP, comparable services, and the continuum of educational services.

The PWN reflects that "a new school is required to offer comparable services to a student with an IEP until the [student's] new IEP is created" and "comparable services are those [services] that are similar to those in the student's existing IEP." "However, if the school can't meet those needs and the district has other schools or supports at neighboring schools, that student is placed where comparable services can be met pending updated data."

The PWN reflects that the continuum of services is based upon the student's goals and objectives "as established by the [IEP team and need] to be adaptable enough to meet a range of needs, and placement choice may alter over time." The continuum of educational services discussed included the general education classroom with support, the partial mainstream/inclusion classroom, the special education class, and a specialized program outside of the complainant's school district. The IEP team proposed these options "due to [the student] having been homeschooled since 11/20/2023." The team determined the student's most recent IEP needed to be reviewed to discuss the student's documented needs based on his IEP, and the comparable services based on the student's current IEP "outlines the student's placement from [MCPS] should be a [REDACTED] program which address behaviors."

The IEP team reviewed the student's 2021 assessments and middle school records. Due to the student enrolling in [REDACTED] on October 11, 2024, the team had "very little behavioral or attendance data." It was reported that the student was due for reevaluation in April of 2025. The IEP team informed the complainant that based on the student's current services he should be placed in "a co-taught/supported general education class." The team discussed the complainant's concerns about the student's enrollment and registration process. The PWN reflects "the IEP will remain as written; pending meeting with county and MSDE. [The IEP team was] unable to update [the student's present levels of performance] PLOP due to insufficient data."

The PWN generated after this meeting is dated October 3, 2024, due to a clerical error.

45. The October 31, 2024, IEP reflects [REDACTED] as the student's service school. The projected IEP annual review date is October 30, 2025. The PLAAFP data, instructional and assessment accommodations, behavior intervention information, supplementary aids, services, program modifications, and supports, and ESY determination continued. The IEP goals were updated to reflect an October 30, 2025, timeframe. The special education services were updated to the following:

- 30, 45-minute sessions of classroom instruction inside general educational, weekly;
- Five, 45-minute sessions of classroom instruction outside general education, weekly;
- Four, 15-minute sessions of classroom instruction outside general education, monthly; and
- Transportation as a related service.

These services would occur from October 31, 2024, to October 30, 2025.

The LRE required by the IEP is inside general education for 80% of the school day.

46. There is no documentation that the complainant contacted the PGCPs to request an annual review meeting after enrolling the student in homeschool in November 2023 or prior to enrolling the student in [REDACTED] in October 2024.

47. There is no documentation that the student ever received special transportation.

DISCUSSIONS AND CONCLUSIONS:

ALLEGATION #1 PLACEMENT

In determining the educational placement of a child with a disability, each public agency must ensure that the placement decision is made by a group of persons, including the parents, and other persons knowledgeable about the child, the meaning of the evaluation data, and the placement options; and is made in conformity with the LRE provisions. The child's placement is determined at least annually; is based on the child's IEP; and is as close as possible to the child's home. (34 CFR § 300.116).

2023-2024 School Year Placement

Based on the Findings of Fact #1, MSDE finds that the PGCPs has not followed proper procedures when determining the student's educational placement for the 2023-2024 school year, in accordance with 34 CFR §§ 300.116 and .321. Therefore, this office finds that a violation occurred concerning the allegation.

2024-2025 School Year Placement

In this case, the parent enrolled the student in homeschooling during the 2023-2024 school year because he did not agree with the recommended placement. The parent then enrolled the student in [REDACTED] in October 2024.

Based on the Findings of Fact #42 and #43, MSDE finds that the PGCPs has followed proper procedures when determining the student's educational placement for the 2024-2025 school year, in accordance with 34 CFR §§ 300.116 and .321. Therefore, this office finds that no violation occurred concerning the allegation.

ADDITIONAL VIOLATION IDENTIFIED DURING THE COURSE OF THE INVESTIGATION

Proper Participants at IEP Team Meetings

The public agency must ensure that the IEP Team for each child with a disability includes not less than one regular education teacher of the child.

In this case, documentation from the August 30, 2023, IEP meeting reflects that a regular education teacher was not invited to nor attended the IEP meeting. Based on the Findings of Fact #5, MSDE finds that the PGCPs did not ensure that the IEP team meeting convened on August 30, 2023, included the required participants, specifically a regular education teacher, in accordance with 34 CFR §300.321. Therefore, this office finds that a violation occurred.

ALLEGATION #2 ADDRESSING PARENT CONCERNS

In developing each child's IEP, the IEP team must consider the concerns of the parents for enhancing the education of their child. (34 CFR § 300.324).

On November 23, 2024, the complainant's wife emailed [REDACTED] staff expressing her concerns that teachers had not shared any information during the IEP meetings held for the student. The [REDACTED] staff member responded to her email. The PWN from the November 20, 2023, manifestation meeting reflects the team discussed the student's IEP goals. There is no documentation that the complainant expressed concerns about the student's academic progress or IEP concerns in writing or at the IEP meetings.

Based on the Findings of Fact #5, #12, #15, #16, #20, #25, #27, #28 and #30, to #34, MSDE finds that the PGCPs has ensured that the complainant's concerns regarding the student's academic progress were addressed. The complainant did not express any concerns regarding the IEP supports since October 2023, in accordance with 34 CFR § 300.324. Therefore, this office finds that no violation occurred concerning this aspect of the allegation.

Social-Emotional Behavioral Concerns

During the October 9, 2023, IEP meeting, the complainant shared his concerns regarding the student's social emotional/behavioral needs with the IEP team. In response, the IEP team determined the student would receive certain behavioral supports while the student attended [REDACTED], however, there is no documentation that the student received those supports and the student's IEP was not amended to reflect that he would be provided those supports. When the student's behavior resulted in multiple disciplinary removals, the team did not revise the IEP or make any recommendations to address the student's needs until the time of the manifestation meeting, when they determined a new FBA was needed.

Based on the Findings of Fact #3, #4, #12, #15, #19, #23, #25, #27, and #35, MSDE finds that the PGCPs has not ensured that the IEP team addressed the parent's concerns regarding the student's social-emotional behavioral needs since October 2023, in accordance with 34 CFR § 300.324. Therefore, this office finds that a violation occurred concerning this aspect of the allegation.

ALLEGATION #3 PROPER PROCEDURES WHEN RESPONDING TO AN IEP MEETING REQUEST

Written notice must be given to the parents of a child with a disability a reasonable time before the public agency proposes to initiate or change the identification, evaluation, or educational placement of the child or the provision of FAPE to the child; or refuses to initiate or change the identification, evaluation, or educational placement of the child or the provision of FAPE to the child. (34 CFR § 300.503).

In this case, there is no documentation that the complainant requested an IEP meeting prior to the [REDACTED] November 10, 2023, response to the complainant's request to have the student reevaluated.

Based on the Findings of Fact #25, MSDE finds that the PGCPs has followed proper procedures when responding to a request for an IEP team meeting since October 2023, in accordance with 34 CFR § 300.503 and COMAR 13A.05.01.08. Therefore, this office finds that no violation occurred concerning the allegation.

ALLEGATION #4 PROVISION OF IEP DOCUMENTS FIVE DAYS PRIOR TO IEP MEETING

Appropriate school personnel shall provide the parent of a student with a disability an accessible copy of each assessment, report, data chart, draft IEP, or other document the IEP team or other multidisciplinary team plans to discuss at that meeting, at least 5 business days before the scheduled meeting. (COMAR 13A.05.01.07).

In this case, prior to the August 30, 2023, IEP meeting, the complainant was emailed a copy of the meeting invitation and the procedural safeguards. The PWN reflects that during the meeting the IEP team reviewed the student's IEP, FBA/BIP, manifestation document teachers input, and review of services. There is no documentation that shows the complainant received these documents five days prior to the IEP meeting. Prior to the October 9, 2023, IEP meeting, the complainant was emailed a copy of the student's suspension notice. The PWN from the meeting reflects that the IEP team reviewed parent input, previous psychological and educational assessments, instructional specialist input and recommendation, input from general and special education teachers, and an incident report in making its determinations. There is no documentation that shows the complainant received these documents five days prior to the IEP meeting. The PWN from the November 2, 2023, IEP meeting reflects the IEP team reviewed parental input, previous psychological and educational assessments, and IEP services to come to its determinations. There is no documentation that shows the complainant received these documents five days prior to the IEP meeting. The PWN from the October 31, 2024, IEP meeting reflects the IEP team reviewed the student's 2021 assessments and middle school records. There is no documentation that shows the complainant received these documents five days prior to the IEP meeting.

Based on the Findings of Fact #2 to #4, #12, #15, #27, #29, and #44, MSDE finds that the PGCPs did not ensure that the parent was provided with accessible copies of each document the IEP team planned to discuss at EP team meetings at least five business days before the scheduled meeting since October 2023, in accordance with COMAR 13A.05.01.07. Therefore, this office finds that a violation occurred concerning the allegation.

ALLEGATION #5 RESPONDING TO A REQUEST TO EVALUATE THE STUDENT

A public agency shall ensure that a reevaluation of each student with a disability is conducted in accordance with 34 CFR §§ 300.303 and 300.305 and COMAR 13A.05.01.05, if the student's parent or teacher requests a reevaluation. The IEP team shall review existing assessment data and on the basis of the review, and input from the student's parents, the IEP team shall identify what additional data, if any, is needed to determine whether the student continues to be a student with a disability; the educational needs of the student; the present levels of academic achievement and related developmental needs of the student; whether additions or modifications to special education and related services are needed to enable the student to meet the measurable annual goals in the student's IEP and to participate in the general curriculum; and whether the student continues to need special education and related services. (COMAR 13A.05.01.06).

In this case, the IEP team convened on November 15, 2023, to consider the complainant's request to have the student reevaluated.

Based on the Findings of Fact #20 to #25, and #26, MSDE finds that the PGCPs did follow proper procedures in responding to a request for a reevaluation since October 2023, in accordance with 34 CFR §§ 300.303 - .311, .503 and COMAR 13A.05.01.06. Therefore, this office finds that no violation occurred concerning the allegation.

ALLEGATION #6 DISCIPLINARY PROCEDURES

On the date a student with a disability is removed from the student's current placement for a violation of a code of student conduct, school personnel shall notify the parents of the decision; and provide the parents with the procedural safeguards notice in accordance with COMAR 13A.05.01.11A. (COMAR 13A.08.03.04).

School personnel may remove a child with a disability who violates a code of student conduct from his or her current placement to an appropriate interim alternative educational setting, another setting, or suspension, for not more than 10 consecutive school days (to the extent those alternatives are applied to children without disabilities), and for additional removals of not more than 10 consecutive school days in that same school year for separate incidents of misconduct (as long as those removals do not constitute a change of placement under § 300.536) (COMAR 13A.08.03.03). School personnel are encouraged to use an array of positive behavior interventions, strategies, and supports to increase or decrease targeted student behaviors. (COMAR 13A.08.03.04). Suspension from transportation services is included as a day of suspension if the service is included in the student's IEP.

In this case, the documentation reflects the student's IEP was updated to include the related service of transportation on September 26, 2023. Other documentation reflects that the student received multiple days out-of-school suspension on October 5, 2023, November 6, 2023, and November 14, 2023, which would have included transportation services. However, there is no documentation that the student ever received specialized transportation during this time period.

Based on the Findings of Fact #47, MSDE finds PGCPs has not disciplinarily removed the student from the school bus since October 2023, in accordance with 34 CFR §§ 300.530 and .531, COMAR 13A.08.03, and COMAR 13A.05.01.10. Therefore, this office finds that no violation occurred concerning this aspect of the allegation.

In this case, documentation reflects that the student received out-of-school suspension for 18 days between September 2023 and November 2023, prior to having a manifestation meeting convened.

Based on the Findings of Fact #27, MSDE finds that the PGCPs did not follow proper procedures when disciplinarily removing the student from school between September 2023 and November 2023, in accordance with 34 CFR §§300.530 – 300.536, COMAR 13A.08.03, and COMAR 13A.05.01.10. Therefore, this office finds that a violation occurred.

ALLEGATION #7 ANNUAL REVIEW

Each public agency must ensure that the IEP Team reviews the child's IEP periodically, but not less than annually. (34 CFR § 300.324).

In this case, the student's May 12, 2023, reflects an annual review date of May 11, 2024. The public agency is not required to provide FAPE to students who withdraw from school in order to pursue homeschooling. As the parent withdrew the student prior to the annual review date and did not request an updated IEP, the PGCPs did not conduct the annual review.

Based on the Findings of Fact #42 and #46, MSDE finds that the PGCPs was not required ensure that the IEP team convened to review the student's IEP before May 11, 2024, to ensure that the IEP was reviewed at least annually, in accordance with 34 CFR § 300.324. Therefore, this office finds that no violation occurred concerning the allegation.

ADDITIONAL VIOLATION IDENTIFIED DURING THE COURSE OF THE INVESTIGATION

Measurable IEP Goals

An individualized education program or IEP must include a statement of measurable annual goals and a description of how the child's progress toward meeting the annual goals will be measured. (34 CFR § 300.320).

In this case, the student's math calculation, reading comprehension, and written language content IEP goals do not state the criterion for mastery and retention.

Based on the Findings of Fact #3, MSDE finds that the PGCPs has not ensured that the student's IEP contains measurable annual goals that are designed to meet the student's needs and enable the student to make progress in the general education curriculum since October 2023, in accordance with 34 CFR § 300.320. Therefore, this office finds that a violation occurred.

Reporting of Progress

The IEP must include a description of how the child's progress toward meeting the annual goals will be measured. (34 CFR § 300.320).

In this case, the student's progress toward the IEP goals reported on November 1, 2023, and November 9, 2023, were not measured as required by the IEP.

Based on the Findings of Fact #13 and #19, MSDE finds that the PGCPs did not measure the student's progress toward the IEP goals reported on November 1, 2023, and November 9, 2023, as required by the IEP, in accordance with 34 CFR § 300.320. Therefore, this office finds that a violation occurred.

Proper Procedures When Amending the IEP

Changes to the IEP may be made either by the entire IEP team at an IEP team meeting, or by amending the IEP rather than by redrafting the entire IEP, provided the parent consents and the amendment is documented in writing. Upon request, a parent must be provided with a revised copy of the IEP with the amendments incorporated. (34 CFR § 300.324).

In this case, the student's IEP was amended on September 21, 2023, and September 26, 2023, without an IEP team meeting or permission to amend without a meeting from the parent. There is also no documentation that the complainant received a copy of the IEP after the amendments were completed.

Based on the Findings of Fact #7 and #9, MSDE finds that the PGCPs did not follow proper procedures when amending the student's IEP in September 2023, in accordance with 34 CFR § 300.324. Therefore, this office finds that a violation occurred.

CORRECTIVE ACTIONS AND TIMELINES:

The IDEA requires that State complaint procedures include 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. 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. Nicole Green, Compliance Specialist, Family Support and Dispute Resolution Branch, MSDE, to ensure the effective implementation of the action.³ Ms. Green can be reached at (410) 767-7770 or by email at nicole.green@maryland.gov.

Student-Specific

By March 6, 2025, MSDE requires the PGCPS to provide documentation that the school system has:

- Revised the student's goals to ensure they are measurable; and
- Convened an IEP team meeting to determine the amount and nature of compensatory services or other remedies to redress the violations herein within a year of the date of this Letter of Findings.

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

School-Based

MSDE requires the PGCPS to provide documentation by March 6, 2025, of the steps it has taken to ensure that the [REDACTED] staff properly implements the requirements for the implementation of comparable services, IEP goal development and progress reporting, IEP amendments, proper procedures for student discipline, and ensuring that the required parties are invited to IEP meetings under the IDEA. These steps must include staff development.

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.

As of the date of this correspondence, this Letter of Findings is considered final. This office will not reconsider the conclusions reached in this Letter of Findings unless new, previously unavailable documentation is submitted and received by this office within fifteen days of the date of this correspondence. The new documentation must support a written request for reconsideration, and the written request must include a compelling reason 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 free appropriate public education (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/ebh

c: Millard House II, Chief Executive Officer, PGCPs
Darnell Henderson, General Counsel, PGCPs
William Fields, Associate General Counsel, PGCPs
Keith Marston, Compliance Instructional Supervisor, PGCPs
Lois Jones Smith, Compliance Liaison, PGCPs
Dr. Wendi Wallace, Compliance Liaison, PGCPs
[REDACTED], Principal, [REDACTED], PGCPs
[REDACTED], Principal, [REDACTED], PGCPs
Dr. Paige Bradford, Section Chief, Performance Support and Technical Assistance, MSDE
Dr. Brian Morrison, Branch Chief, Policy and Accountability, MSDE
Alison Barmat, Branch Chief, Family Support and Dispute Resolution, MSDE
Tracy Givens, Section Chief, Dispute Resolution, MSDE
Nicole Green, Compliance Specialist, MSDE
Elizabeth B. Hendricks, Complaint Investigator, MSDE