



STATE OF CONNECTICUT
DEPARTMENT OF EDUCATION



July 18, 2013

Dr. Stephen Falcone, Superintendent
Darien Public Schools
35 Leroy Ave
Darien, CT 06820-4416

Re: Investigation of Special Education Program

Dear Dr. Falcone:

The Connecticut State Department of Education ("CSDE") is responding to the petition filed with this agency regarding the Darien Public Schools' ("Darien" or "the district") special education program. This is the first of two reports to be issued.

This report sets forth the preliminary findings of the CSDE, Bureau of Special Education ("BSE") investigation of Darien's special education policies, procedures and practices. This report provides the initial: (1) findings and conclusions of the investigators; (2) findings of violations of federal and state statutes and regulations; and (3) corrective actions required to be taken by the district. Specifically, this report addresses the appropriateness of the special education training and guidance materials (e.g., PowerPoint presentations, procedure documents) promulgated by district administration between July 1, 2012, and April 16, 2013.

The CSDE Special Education General Supervision System

The Individuals with Disabilities Education Improvement Act (IDEA) applies to the state educational agency and public agencies within the state. In Connecticut, the CSDE is the state educational agency and public agencies are local educational agencies (LEAs), which include public school districts, the Connecticut Technical High School System, the Department of Children and Families, the Department of Corrections, and the Department of Mental Health and Addiction Services. Under the IDEA, states are charged with the responsibility for the general supervision of LEAs including ensuring that educational programs for children with disabilities meet the state educational standards as well as requirements of the IDEA, Part B (34 C.F.R Section 300.149(a),(b)).

The CSDE's General Supervision System (GSS) for special education, coordinated by the BSE, is an integrated management system of CSDE compliance monitoring and program improvement activities. The purpose of the GSS is to ensure LEAs implement the IDEA and Connecticut General Statutes Sections 10-76a to 10-76h, inclusive and their corresponding regulations, correct any deficiencies identified through LEA monitoring and to improve the educational results and functional outcomes for all children with disabilities. When the CSDE identifies LEA noncompliance through its GSS compliance monitoring activities, defined as a violation of a requirement under the IDEA and its corresponding regulations and/or a violation of a requirement under the General Statutes of Connecticut and its corresponding regulations, the CSDE is required to issue a finding of noncompliance.

The Petition

In a letter to the Commissioner of Education dated March 20, 2013, a group of Darien parents requested that the CSDE convene a hearing to consider withholding funds from the Darien Board of Education for “its systematic violations of parental rights under the IDEA.” More specifically, the petition alleges the parents were systematically excluded from deliberations concerning their children during the 2012-13 school year. Included with the letter as supporting documentation was a copy of a district special education guidance document titled *Building Consistency of Sped [sic] Practices District Wide*. The petition claims that this document, which was provided to district staff, contains guidance that is inconsistent with special education law and CSDE policy.

The Investigation

The CSDE assigned four BSE staff members to conduct a formal review of the district’s special education policies and procedures. BSE staff determined that the investigation would include a review of Darien’s Special Education Policy and Procedures Manual, all special education training materials (e.g., PowerPoint presentations, handouts, etc.) and special education administrative staff correspondence related to special education policies and procedures utilized from July 1, 2012, to April 16, 2013. The documents would be examined to determine if the directives and guidance provided to Darien special education and related services staff members comply with state and federal regulatory requirements, as well as CSDE policy. In a letter dated April 16, 2013, to Dr. Deirdre Osypuk, the Director of Special Education and Student Services for the district, the CSDE informed Darien that the district was required to provide the CSDE with the following documentation:

1. All district Special Education Policy and Procedure Manuals that were in effect between July 1, 2012, and April 16, 2013.
2. Copies of all special education training materials (e.g., PowerPoint presentations, handouts, etc.) used in the provision of professional development to Darien personnel between July 1, 2012, and April 16, 2013.
3. Copies of all special education administration correspondence related to special education policies and procedures (e.g., e-mails) sent to school staff between July 1, 2012, and April 16, 2013.

Additionally, the letter informed the district that, as part of the review, BSE staff would visit the district to conduct interviews with Dr. Osypuk, other district special education administrative staff, and building principals and planning and placement team (PPT) chairpersons to address the concerns set forth in the petition. The site visit also included a two-hour parent meeting to allow parents an opportunity to give input on the district’s special education services. The CSDE subsequently informed the district’s attorney that during the visit, BSE staff would also be examining student files, including the records of the children of the petitioners and the records of 15 randomly selected students who receive special education services, to check for compliance and to identify any patterns of noncompliance.

Darien complied with the documentation request in a timely manner, and BSE staff conducted a desk audit of the special education training materials during May and June of 2013. Darien also cooperated with the CSDE by providing space at the Board of Education offices on the requested date of June 10, 2013, for the file reviews and interviews. BSE staff determined that the parent meeting would be held in the Common Room at Tokeneke Elementary School, which district staff prepared for the meeting.

The following documents, the majority of which were distributed or presented to district staff as training materials, were reviewed for this report:

Document Description/Title
A summary of legislation (Public Act No. 12-173 An Act Concerning Individualized Education Programs and Other Issues Relating to Special Education (Effective July 1, 2012))
<i>Special Education and Student Services</i> (dated 8/30/12)
Documents Provided to Administrators: <ul style="list-style-type: none"> • <i>Clarifying Questions for Persons Chairing PPT Meetings</i> (dated 9/24/12) • <i>How to Run a Pre-Meeting</i> (dated 9/24/12) • Letter to parents regarding parents' right to request a meeting to review PPT process
Internal Procedures: <ul style="list-style-type: none"> • <i>Staff Procedures for Processing Initial Referrals to Sped</i> (dated 10/3/12) • <i>Administrator/Secretary Processing Initial Referrals to Sped</i> (dated 10/3/12) • <i>IEP Direct Dates</i> (dated 1/3/13) • <i>Procedure for Processing Students Initially Identified by District</i> (dated 1/9/13) • <i>Procedures for Processing Newly Registered Sped Students</i> (dated 3/6/13) • <i>Procedure for Processing Students Exiting Special Ed in Darien</i>
Letter to ECS and First Student regarding bus restraint procedures (dated 12/10/12)
<i>Building Consistency of Sped Practices District Wide</i> (dated 11/6/12)
Eligibility Worksheets: <ul style="list-style-type: none"> • <i>Worksheet For Eligibility Under OHI-ADHD</i> (dated 1/15/13) • <i>PPT Report of Eligibility for Special Education due to Developmental Delay</i> (dated 2/21/13) • <i>ESY Eligibility Worksheet</i> (dated 3/12/13) • <i>Adaptive Physical Education (APE) Eligibility Criteria Under the IDEA</i> (Draft) • <i>Worksheet for Determination of Eligibility for Special Education Services under the Classification of Autism</i>
<i>PPT Checklist</i> (dated 2/25/13)
<i>District Guidance Regarding Requests to Complete Rating Scales from Outside Providers</i> (dated 3/17/13)
Independent Educational Evaluation (IEE) Documents: <ul style="list-style-type: none"> • <i>Parent Requests an IEE</i> • <i>Procedures for IEE's</i> (dated 1/28/13) • <i>Criteria for Evaluators Conducting Independent Education Evaluations (IEE's)</i> (Draft)
• <i>Frequently Asked Questions (FAQs) - Darien Special Education</i>
• <i>TLC [Therapeutic Learning Center] Fact Sheet</i>
Eligibility Worksheets: <ul style="list-style-type: none"> • <i>Eligibility Worksheet for Developmental Delay (DD)</i> (different from previous Developmental Delay Worksheet) • <i>Intellectual Disability Eligibility Documentation</i>
<i>Functional Behavior Assessment</i>

<i>Behavior Intervention Plan</i>
<i>Strategy for Success Worksheet and Tracking</i>
E-mail Communication from S. Falcone to Administrative Council dated 4/9/13
Sample Individualized Education Program
Special Education Policies and Procedures Manual
Special Education Policies and Procedures Documents
IEP Manual and Forms – Fourth Revision (dated 3/2013)
PowerPoint Presentations
<i>Special Education Administrator Meeting (dated 7/25/12)</i>
<i>Department of Special Education and Student Services (D. Osypuk, E. Wesolowski)</i>
<i>Department of Special Education and Student Services - General Education Teachers (D. Osypuk, E. Wesolowski)</i>
<i>Department of Special Education and Student Services (D. Osypuk, L. Straiton)</i>
<i>Department of Special Education and Student Services (D. Osypuk, C. Wood)</i>
<i>Special Education Instructional Aides – ELP: Helping to Foster Student Independence</i>
Section 504 Presentations: <ul style="list-style-type: none"> • <i>Section 504 of the ADA Amendments Act (effective 7/1/09): As it Pertains to the Schools (dated 9/24/12)</i> • <i>ADA Amendments Act: Section 504 – Understanding and Application to the Public School Setting</i>
Presentations to the Darien Board of Education: <ul style="list-style-type: none"> • <i>A Basic Understanding of IDEA (dated 8/15,16/12)</i> • <i>RC-24 Special Education Proposed Budget 2013-2014</i> • <i>Report to the BOE – February 26, 2013 (dated 2/26/13)</i>
<i>Related Services (Student and Educator Support Services), What is the meaning of ‘related’?; Guidelines for making effective IEP Decisions (Sharon McCloskey, Director of Constellation School Based Services)</i>

Findings of Noncompliance and Recommendations Related to Special Education Training Materials and Guidance Documents

The district developed and used several special education presentations and guidance documents during the 2012-13 school year. While much of the content in these materials appears to be compliant with special education law, some of the information contained within the materials has been determined to be inconsistent with the requirements of IDEA.

Findings of noncompliance for the reviewed documents have been outlined below and are accompanied by corresponding corrective action(s). These specific corrective actions are required if the district chooses to revise and reuse the documents. Regardless of the intent of the district to reuse these materials, the topics for which findings of noncompliance have been made should be reviewed in future trainings with district personnel to ensure that appropriate staff members have an accurate understanding of federal and state special education statutory and regulatory requirements.

While some of the concerns represented in the following list of documents may not rise to the level of a specific violation of IDEA, certain information contained in the documents may be unclear and/or incomplete. In these instances, recommendations are being provided so that each document will be reviewed, and revised as necessary, to ensure full consistency with the spirit and intent of IDEA.

1. Document: *Special Education and Student Services*

Recommendation: Recognizing that parents play an integral part in the decision-making process when developing student programs, the district should include parents in the “Department Mission” section of the document.

2. Document: *Clarifying Questions for Persons Chairing PPT Meetings*

Finding of Noncompliance: The requirement in the document to speak with certain staff (Board Certified Behavior Analysts, Board Certified Assistant Behavior Analysts, Teachers of the Visually Impaired, Teachers of the Hearing Impaired) before making a recommendation for his/her services is overly restrictive and represents a violation of IDEA by undermining the decision-making authority of the planning and placement team (PPT).

Corrective Action: The district must revise or remove language in this document that is not consistent with the IDEA requirement that each student’s IEP services be individually determined by a properly constituted PPT.

Recommendation: Examples would help to clarify the “Present Levels of Performance” section. A typographical error (“not”) is noted in the “Goals/Objectives” section 1a.

3. Document: *Building Consistency of Sped Practices District Wide*

Finding of Noncompliance: This document provides guidance regarding the provision of “ESY” [extended school year] and “APE” [adapted physical education] services, both areas of service that students with disabilities could be eligible to receive under IDEA. The document uses statements such as “Must have data to indicate regression and failure to recoup within 6-8 weeks,” “Should rarely be considered for any student who does not qualify for PT,” “...there must be a prior discussion with a sped administrator” and “Unified front – if changes are going to be recommended, differences among team members need to be worked out prior to PPT.” Furthermore, the guidance in this document limits the participation of specific related services personnel (OT, AT, THI and TVI) in the PPT process, thereby potentially preventing individualization of a student’s program.

Corrective Action: The district must revise or remove language in this document that is not consistent with the IDEA requirement that each student’s individualized education program (IEP) services be individually determined by a properly constituted PPT. The district must also revise ESY language to align with the CSDE’s ESY Topic Brief. APE language needs to align with guidance provided in the *Guidelines for Adapted Physical Education* document. Both of these documents are available on the CSDE Web site.

4. Documents: *Worksheet For Eligibility Under OHI-ADHD*

*PPT Report of Eligibility for Special Education due to Developmental Delay
Adaptive Physical Education (APE) Eligibility Criteria Under the IDEA
(DRAFT)*

Finding of Noncompliance: Information on these worksheets is overly specific and is inconsistent with eligibility determination procedures outlined at 34 C.F.R. § 300.306.

Corrective Action: The district needs to revise the *Worksheet For Eligibility Under OHI-ADHD* document to ensure that guidance is consistent with the *Report on Attention Deficit Hyperactivity Disorder (ADHD)*, which is available on the CSDE Web site. The district needs to discontinue the use of the *PPT Report of Eligibility for Special Education due to Developmental Delay* document and review the *Eligibility Worksheet for Developmental Delay (DD)* document that was also submitted to the CSDE for review to ensure compliance with regulatory requirements.

Recommendation: When finalizing the *Adaptive Physical Education (APE) Eligibility Criteria Under the IDEA* draft document, the district should ensure that the guidance provided is consistent with the *Guidelines for Adapted Physical Education* document, which is available on the CSDE Web site.

5. **Document:** *District Guidance Regarding Requests to Complete Rating Scales from Outside Providers*

Finding of Noncompliance: This document states, "...The Darien Public Schools will only be responsible for completing rating scales or questionnaires recommended by a Planning and Placement Team (PPT) or 504 Team." This specific directive is in conflict with the district's obligation under Child Find and represents a violation of IDEA.

Corrective Action: The district must remove or appropriately revise this language to be consistent with its Child Find requirements under IDEA. The district should ensure that all staff members received the subsequent guidance on the district's practices for the completion of rating scales that Superintendent Falcone sent to "Administrative Council" via e-mail on April 9, 2013.

6. **Documents:** *Parent Requests an IEE Procedures for IEE's*

Finding of Noncompliance: These documents contain language that suggests a request for an IEE must be made at a PPT meeting. There is no state or federal requirement for a district to hold a PPT meeting in response to a request for an IEE. District guidance should be consistent with procedures outlined at 34 C.F.R. §300.502.

Corrective Action: The language in both documents needs to be revised to mirror the language regarding IEEs in IDEA. The district must also ensure that holding a PPT in no way interferes with a parent's right to an IEE. If it is district practice to convene a PPT meeting to discuss IEE requests, the documents should clearly state that such a meeting is not intended to interrupt, interfere with or otherwise compromise the requirements of IDEA.

Recommendation: Typographical errors should be corrected on the *Parent Requests an IEE* document.

7. **Document:** *Criteria for Evaluators Conducting Independent Education [sic] Evaluations (IEE's)* (DRAFT)

Recommendation: When finalizing this draft document, the district should ensure that the guidance provided is consistent with 34 C.F.R. § 300.502. Sections 2a, 4b and 5c of the document appear to impose conditions that limit the parent's rights to an IEE at public expense.

8. Document: *Frequently Asked Questions (FAQs) - Darien Special Education*

Recommendation: The answer to FAQ 9 provides information regarding data collection on regression/recoupment and does not include information on nonregression factors. The district should revise this language to align with the CSDE's ESY Topic Brief.

9. Document: *TLC Fact Sheet*

Recommendation: The least restrictive environment (LRE) language contained in this document appears to focus solely on a continuum of services. Language should be added to reflect that the LRE for each student is an individualized determination.

10. Document: *Special Education Administrator Meeting (PowerPoint presentation)*

Finding of Noncompliance: The directives on the slides titled "Immediate Stop-Gap Measures" that state to: (1) speak with the Director of Special Education before recommending certain services at a PPT meeting; and (2) refrain from writing certain services in an IEP; are overly restrictive and represent violations of IDEA by undermining the decision-making authority of the PPT.

Corrective Action: The district must revise or remove language in this document that is not consistent with the IDEA requirement that each student's IEP services be individually determined by a properly constituted PPT.

Recommendation: The third slide of the presentation should include information on including an independent living goal in the student's IEP, if appropriate.

11. Documents: *Department of Special Education and Student Services – D. Osypuk, E. Wesolowski (PowerPoint presentation)*

Department of Special Education and Student Services – D. Osypuk, L. Straiton (PowerPoint presentation)

Department of Special Education and Student Services – D. Osypuk, C. Wood (PowerPoint presentation)

Finding of Noncompliance: The suggested discussion responses listed on the slides titled "What to Say When..." and the listing of potential recommendations requiring discussion with an administrator prior to a PPT meeting are overly restrictive and represent violations of IDEA by undermining the decision-making authority of the PPT. Information provided on the slide titled "What is Specialized Instruction?" is incomplete and inconsistent with the federal definition found at 34 C.F.R. § 300.39.

Corrective Action: The district must revise or remove language in this document that is not consistent with the IDEA requirement that each student's IEP services be individually determined by a properly constituted PPT. The specialized instruction language needs to be revised to align with the federal definition.

Recommendation: The text associated with the slides titled "Decision-Making Approach: 'More-is-Better'" may be misinterpreted to mean there are no students who require extensive services; it should be revised. Language on "skill building" should be included in the goal statement on the slide titled "School-Based Practice."

12. Document: *Department of Special Education and Student Services - D. Osypuk, E. Wesolowski (PowerPoint presentation for General Education Teachers)*

Finding of Noncompliance: Information provided on the slide titled “What is Specialized Instruction?” is incomplete and inconsistent with the federal definition found at 34 C.F.R. § 300.39.

Corrective Action: The specialized instruction language needs to be revised to align with the federal definition.

Recommendation: The ordering of different placements (continuum of services), regular class placement language and achievement research language may be unclear and should be considered for revision.

13. Document: *Special Education Instructional Aides – ELP: Helping to Foster Student Independence (PowerPoint presentation)*

Recommendation: The information in this presentation appears to be meant as a general overview as it does not address individual student’s needs. Specifically, it should be noted that the ordering of strategies for building student independence and suggested activities for the instructional aide may not be consistent with individual student IEPs.

14. Document: *A Basic Understanding of IDEA (PowerPoint presentation)*

Finding of Noncompliance: Information provided on the slide titled “What is Specialized Instruction?” is incomplete and inconsistent with the federal definition found at 34 C.F.R. § 300.39. Language on the “PPT Meetings” slide that states, “Parent must provide advanced notice of attorney, recording PPT’s, outside evaluations.” is inconsistent with the law as no such requirements exist.

Corrective Action: The specialized instruction language needs to be revised to align with the federal definition. The language regarding the requirement that parents provide advance notice to the district if intending to bring an attorney or outside evaluations and/or record the PPT needs to be revised/removed to comply with federal and state statutes/regulations.

Recommendation: The slide titled “Transition Planning” should include information on including an independent living goal in the student’s IEP, if appropriate. The ordering of different placements on the slide titled “Least to Most Restrictive Placement” may be unclear. Language should be added to reflect that the LRE for each student is an individualized determination.

15. Document: *Sample Individualized Education Program*

Recommendation: The guidance provided on pages 4 and 5 of this document should be revised to be less specific and align with guidance provided in the CSDE document titled *IEP Manual and Forms* (Fourth Revision, March 2013). The examples for the frequency of services on page 11 lack a unit of measure (e.g., hours per week).

16. Document: *Special Education Policies & Procedures Manual*

Finding of Noncompliance: Information in the “Assistive Technology” section of this document, which states “Approval for all Assistive Technology equipment must come from the Central Office,” is overly restrictive and represents a violation of IDEA by undermining the decision-making authority of the planning and placement team (PPT).

Corrective Action: The district must revise or remove language in this document that is not consistent with the IDEA requirement that each student's IEP services be individually determined by a properly constituted PPT.

Recommendation: This manual will need to be updated to align with the revised special education regulations that went into effect on July 1, 2013. Other minor revisions such as confusing text in the "Age of Majority" section and updates to state agency names and district contact information are also needed.

Conclusion

It is concluded that the aforementioned training materials used by the district during the 2012-13 school year contain overly restrictive, inaccurate, noncompliant and/or incomplete guidance. While the above list summarizes some of the particular issues with specific materials, it is meant to be a representative sample of the general areas of concern and is not an exhaustive analysis.

Considering that the reviewed materials did provide a great deal of appropriate guidance, revising the documents/presentations for future use is an option for the district. However, extreme caution should be used when repurposing any of the above documents/presentations to ensure that all of the guidance contained in the new training material complies with state and federal statutes/regulations.

In a response letter dated April 5, 2013, the CSDE informed the parents that the BSE's GSS provides for tiered levels of interventions, including enforcement actions, to employ when a school district is found to be out of compliance with state or federal special education law. In accordance with this system, the sanction of withholding funds to a district may be used under the condition that the district has demonstrated longstanding noncompliance. Pursuant to this system and the CSDE's directive to the BSE to complete a thorough review of the Darien's special education policies and procedures, the parents were notified that their request for a hearing regarding the withholding of funds was not appropriate at this time and, therefore, would not be granted.

Determination of Violations of Federal and State Statutes and Regulations

During the course of the investigation, the district conceded that some of the information contained in these documents/presentations is inconsistent with state and federal law.

On April 29, 2013, Superintendent Stephen Falcone sent the following message, which retracts any previous guidance requiring staff to receive prior approval for services, to all district staff via e-mail:

For Staff:

Please be reminded that special education decision-making is vested, by federal and state law, in the individual student's PPT. The PPT must address the individual needs of each student, in accordance with the law, and thus there is no need or requirement to receive prior approval for the inclusion of any special education services and/or related services in an IEP. The PPT is obligated to make decisions based on the information and data available to the PPT. As we work to revise some of our training information, staff involved in special education in the District should not rely on any statements to the contrary, written or verbal, provided after July 1, 2012.

In another e-mail dated April 9, 2013, that was sent to "Administrative Council" (copied to "Cabinet"), Superintendent Falcone provided revised guidance concerning the district's procedures with respect to the completion of behavior rating scales.

Prior to the beginning of the CSDE's investigation and Superintendent Falcone's e-mail messages, it appears that the district administration attempted to clarify some of the guidance provided in the training documents. On August 24, 2012, Dr. Osypuk sent an e-mail to secondary level special education staff regarding the special education PowerPoint presentation. Dr. Osypuk states, "Also, note, we ran out of time to discuss the last slide on the PowerPoint. Please note that these potential recommendations DO NOT require prior approval by an administrator, just simply a discussion." In addition, in an e-mail dated March 21, 2013, sent to special education staff, Dr. Osypuk states, "DRAFT g/o should NOT be sent home for Initial Eligibility, Age 6 (Dev. Del. Reeval), or Triennials. The reason that we cannot send home DRAFT IEP g/o for these 3 types of PPTs is b/c one could construe this to mean that an eligibility decision has been predetermined."

While the CSDE acknowledges the proactive measures the district has taken to address the issues in the training materials, the CSDE finds that during the 2012-13 school year, the district used materials containing information that is out of compliance with the IDEA and Connecticut General Statutes Sections 10-76a to 10-76h, inclusive and their corresponding regulations. Corrective actions have been assigned.

Required Corrective Actions

In order to implement the federal and state special education statutes and related regulations correctly, the district is required to complete the following corrective actions:

1. Review and revise any noncompliant policies, procedures and/or practices that have been established in the district as a result of documents set forth herein.
2. Submit all revised and new guidance documents/training materials for a period of 10 months (July 18, 2013, through May 16, 2014) to the CSDE at least two weeks prior to their use. BSE staff will review these materials to ensure that the guidance and directives contained within comply with federal and state special education statutes and related regulations. BSE staff will notify the district if any changes are needed before the materials are used with district personnel.
3. Conduct training to district staff on special education requirements. District procedures and practices addressed in the "Finding of Noncompliance" sections for each of the documents listed above should be reviewed to ensure that district personnel have an accurate understanding of federal and state special education law.
4. Submit a schedule of all trainings provided by the district as well as the training session agendas for the same 10 month time period.
5. Provide a copy of the sign-in sheets for the above-referenced training sessions.

The district notified the CSDE that it has retained Attorney Theresa DeFrancis to independently review and revise staff development materials as necessary. Ms. DeFrancis will also conduct training in the procedures of special education to school personnel (administrators, teachers, other certified staff) and parents. Lastly, she will be responsible for providing recommendations of needed changes to the Darien Board of Education and Superintendent of Schools to ensure the district's compliance with the law. The CSDE accepts this as an appropriate response to the findings and conclusions noted in this report and expects the district to move forward with this arrangement.

Dr. Stephen Falcone
July 18, 2013
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Documents related to the above corrective actions should be mailed or faxed to:

Michael J. Tavernier
CT State Department of Education
165 Capitol Avenue, Room 369
Hartford, CT 06106
michael.tavernier@ct.gov
Fax: 860-713-7051

PLEASE NOTE: It is anticipated that the second of the two reports will be completed by the end of the summer.

Sincerely,



Charlene Russell-Tucker
Chief Operating Officer

CRT:mt

cc: Stefan Pryor, Commissioner of Education
Andreana Bellach, Attorney
Andrew Feinstein, Attorney
Jay Brown, BSE Consultant
Gail Mangs, BSE Consultant
Mary Jean Schierberl, BSE Consultant
Michael Tavernier, BSE Consultant