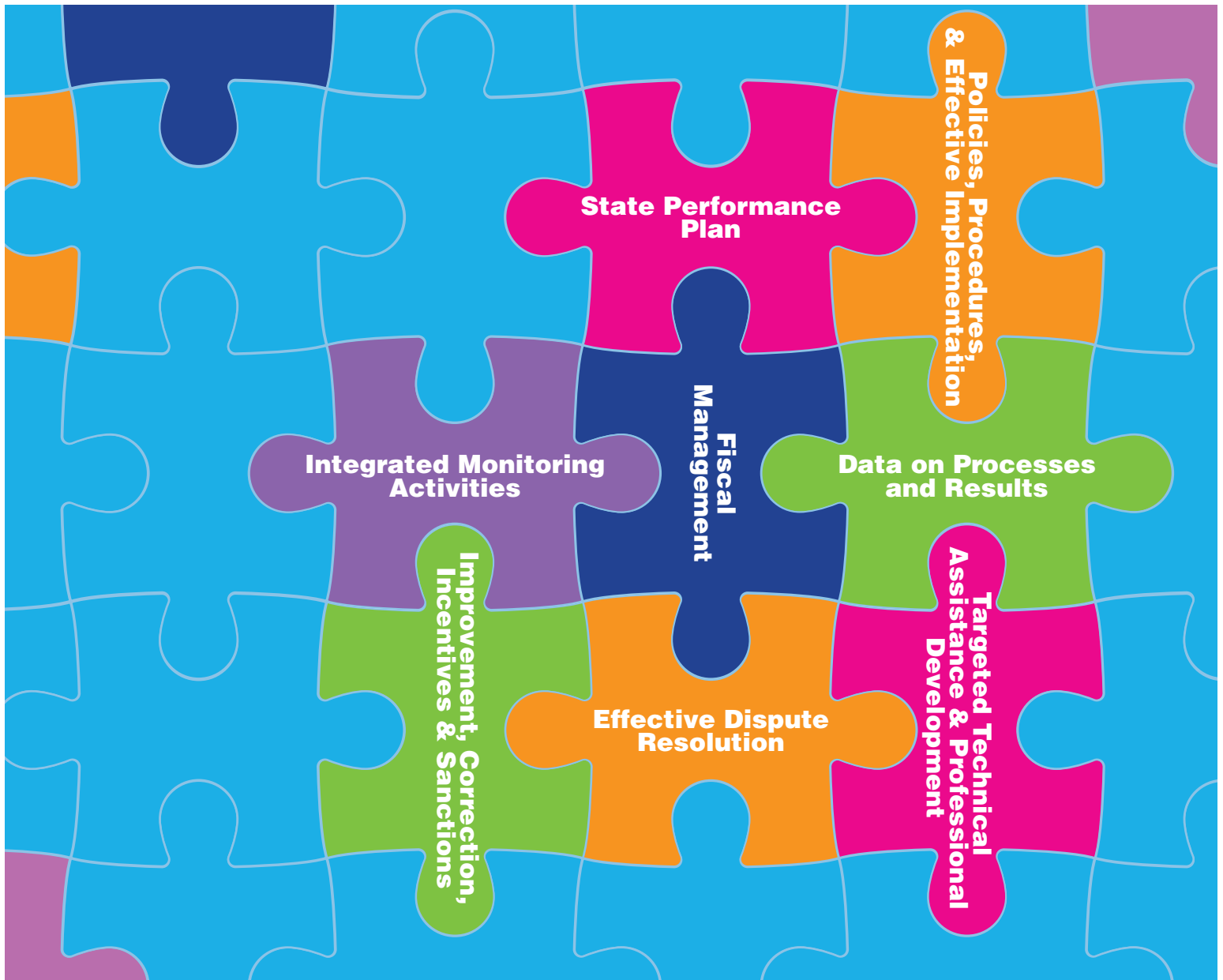


Annual Report of Compliance Monitoring Activities

2014-2015

*West Virginia Department of Education
Division of School Effectiveness
Office of Federal Programs*





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Introduction

The West Virginia Department of Education, Office of Federal Programs (OFP), has the primary responsibility for ensuring that educational services are provided to all eligible students with exceptionalities. *The Individuals with Disabilities Education Improvement Act 2004 (IDEA)* and Policy 2419: *Regulations for the Education of Students with Exceptionalities* ensure that all students with exceptionalities have available a free appropriate public education (FAPE).

This annual compliance report includes data on monitoring activities, written complaints, due process hearings, including the resolution process and mediations that were requested during the 2014-2015 school year and documents the Department's efforts to meet the requirements under IDEA and Policy 2419 pertaining to:

- administering the monitoring system, written complaints, due process hearings, including the resolution process and mediation, and
- making findings and decisions from compliance on-site monitoring, annual desk audits (ADA), annual LEA determinations, written complaints and due process hearings available to the public.

Monitoring System

The Office of Federal Programs (OFP) is responsible for ensuring states' compliance with the Individuals with Disabilities Education Improvement Act of 2004 (IDEA) and its implementing regulations and the West Virginia Code §18-20 (Education of Exceptional Children) that require the West Virginia Department of Education to adopt and use procedures to assure public agencies are providing a free appropriate public education to students with exceptionalities. Furthermore, IDEA guarantees the free appropriate public education (FAPE) of children with disabilities in the least restrictive environment (LRE).

To meet the needs of students with disabilities, OFP has developed a continuous improvement monitoring process which places an equal focus on compliance requirements and the performance of students with exceptionalities. The Compliance Monitoring System includes various monitoring activities which occur either annually or on a four-year cycle. In addition, all local educational agencies (LEAs) are required to complete annually a District Self-Assessment for self-review and improvement planning. Four types of formal monitoring processes are conducted.

- Compliance On-Site Monitoring
- Annual Desk Audit (ADA)
- Focused Monitoring
- Dispute Resolution Process

Compliance On-Site Monitoring

Compliance On-site Monitoring is a comprehensive monitoring activity occurring on a four-year cycle. Each LEA will receive an on-site monitoring no less than every four years and will participate in activities described in these procedures. This activity is conducted through an on-site visit in selected districts. The monitoring team during the 2014-15 school year consisted of Office of Special Programs (OSP) staff and other educators as determined by the Lead Monitor. Districts selected for a Compliance On-Site Monitoring engaged in pre-monitoring activities, on-site monitoring activities and the corrective improvement process. Although all SPP and WV Indicators are important, the OSP determined monitoring priority Indicators for mandatory review during the Compliance On-site Monitoring visit.

Fifty-seven (57) LEAs were monitored within a four year cycle as required by the West Virginia Code §18-20-1 (Education of Exceptional Children). In addition, the state has the responsibility to have a system for enforcing the requirements of the Individuals with Disabilities Education Act of 2004 (IDEA). The table below provides the four year cycle.

| Compliance On-Site Monitoring 2014-2015 | Compliance On-Site Monitoring 2015-2016 | Compliance On-Site Monitoring 2016-2017 | Compliance On-Site Monitoring 2017-2018 |
|---|--|--|---|
| <ul style="list-style-type: none"> • Brooke • Doddridge • Grant • Jackson • Jefferson • OIEP • Nicholas • Pleasants • Taylor • Wayne • Webster • Wetzel | <ul style="list-style-type: none"> • Barbour • Braxton • Calhoun • Clay • Hampshire • Lewis • Marshall • Mercer • Mingo • Monroe • Pendleton • Pocahontas • Roane • Tucker | <ul style="list-style-type: none"> • Cabell • Fayette • Gilmer • Greenbrier • Hancock • Kanawha • McDowell • Mineral • Morgan • Ohio • Preston • Randolph • Wirt • Wood • Wyoming | <ul style="list-style-type: none"> • Berkeley • Boone • Hardy • Harrison • Lincoln • Logan • Marion • Mason • Monongalia • Putnam • Raleigh • Ritchie • Summers • Tyler • Upshur • WVSD |

Annual Desk Audit (ADA)

The ADA is submitted electronically each year and is a review of both compliance and results State Performance Plan (SPP) Indicators. Districts with less than 100% on compliance indicators will receive written notice of noncompliance. Each ADA indicator determined Not Met requires completion of an improvement plan to be reviewed and accepted by the OSP. The ADA must be completed and submitted annually to the OSP, identifying findings of noncompliance and areas requiring program improvement.

Focused Monitoring

Focused Monitoring is a monitoring process where an LEA may receive a visit based on an identified need or other data source (i.e., an LEA receiving a large number of complaints on a specific issue). A Focused Monitoring will drill down within the LEA's data to identify root causes and solutions to an on-going issue of compliance, performance or both. Each Focused Monitoring is individualized to the district and the situation.

Dispute Resolution Process

Special Education laws and regulations ensure that all students with exceptionalities have available a process to receive written complaints, mediation and due process complaints. This important procedural safeguard for parents is required by federal law. The timely resolution of complaints, mediations and due process actions is required for a complaint dispute process. Effective dispute resolution data enable the State to track identified issues to determine whether a patterns or trends exist and the effectiveness of reaching resolutions.

Office of Special Education Programs – OSEP 09-02

The OSEP issued a memorandum (OSEP 09-02 Memorandum of Correction) to states on October 17, 2008 clarifying expectations for correction of noncompliance by the LEA and the verification of that correction by the state. The principles in this memorandum are the standard by which the OFP reports noncompliance and correction in the SPP/APR and determines whether or not each LEA had made the appropriate corrections. The memorandum requires two levels, or prongs, of verification of correction for all findings identified in writing to an LEA, excluding State Complaints or Due Process Hearing Decisions.

2014-2015 Findings of Noncompliance

The data below provides the total number of findings of non-compliance for the 2014-2015 school year from the ADA and Compliance On-Site Monitoring activities. The findings of noncompliance are provided to each LEA for review and correction. If the state finds noncompliance in an LEA, the State must notify the LEA in writing of the noncompliance and the requirement that the noncompliance be corrected as soon as possible, but in no case more than one year from identification. The one year correction requirement begins the date the State provides written notification to the LEA. The written notification from the State will detail specific steps the LEA must take to correct the noncompliance. To assure the LEA is correctly implementing the specific regulatory requirement(s) that were found to be noncompliant (Prong 2) a random sample of current IEPs in approximately six months will be reviewed. Correction is completed on the date the State determines both prongs are in compliance.

2014-2015 Compliance On-Site Monitoring Findings

Compliance on-site monitoring occurs on a four-year cycle. Fourteen (14) districts received an on-site compliance monitoring visit during the 2014-2015 school year and are as follows: Brooke, Doddridge, Grant, Jackson, Jefferson, Office of Institutional Education, Nicholas, Pleasants, Taylor, Wayne, Webster, and Wetzell. The information provided below provides the number of the 16 districts monitored that were noncompliant for the specific area indicated.

Administrative Review

| Administrative Findings | Noncompliance Districts |
|---|-------------------------|
| AF4: Instructional Groupings | 1 district |
| AF5: Certification/Caseloads | 4 districts |
| AF7: Classroom Location & Size | 1 district |
| AF8: Other: <ul style="list-style-type: none">Continuum of Services | 1 district |

Student File Review

| File Review Summary of Percentage of Noncompliance | Districts Below 75% |
|--|---------------------|
| General Supervision | |
| Amendment | 1 district |
| IEP Participation & Development | 6 districts |
| Assessment (Initial and Re-Evaluation) | 1 district |
| Discipline Procedures (Students over 10 days) | 1 district |
| Service Verification | 6 districts |

The Office of Special Programs (OSP) revised the data collection process for Indicator #13 during the 2011-2012 school year. The OFP (formally the OSP Monitoring Unit) collects and reports the transition age IEPs reviewed during the districts on-site monitoring reviews. In addition, the OFP continues to mandate the annual self-assessment process for Indicator 13 for those districts who are not receiving an on-site monitoring review. The table below provides the compliance data for those districts that received the Transition Review during the on-site and does not include the self reporting during the ADA.

Transition On-Site Monitoring File Review

| County School District | File Sample Size | Compliance Percentage |
|------------------------|------------------|-----------------------|
| District 1 | 10 | 100% |
| District 2 | 4 | 100% |
| District 3 | 10 | 100% |
| District 4 | 10 | 100% |
| District 5 | 3 | 33.3% |
| District 6 | 3 | 66.67% |
| District 7 | 8 | 100% |
| District 8 | 3 | 100% |
| District 9 | 2 | 100% |
| District 10 | 10 | 100% |
| District 11 | 3 | 66.67% |
| District 12 | 2 | 100% |

**West Virginia Department of Education
Office of Federal Programs
On-site Monitoring Activities Evaluation**

County: _____
Special Education Director: _____
Guest Monitor: _____

The Office of Federal Programs (OFP) Monitoring Team's purpose is to provide guidance to the district staff regarding compliance issues related to the education of students with disabilities. So that we may continually work to improve our monitoring procedures, we would appreciate your input. Please rate your level of satisfaction with the on-site monitoring activities.

| | Not at all satisfied | Somewhat satisfied | Satisfied | Very Satisfied | Extremely Satisfied |
|--|----------------------|--------------------|-----------|----------------|---------------------|
| 1. In general, how satisfied were you with the monitoring visit? | | | | 1 | 11 |
| 2. Did the Compliance Coordinator attempt to gain your trust and confidence prior to the visit? | | | | 2 | 10 |
| 3. At the entrance conference, did the Compliance Coordinator clearly outline the procedures and team activities for the visit? | | | | | 12 |
| 4. Were staff interviews and focus group sessions conducted in a professional manner? | | | | 1 | 11 |
| 5. At the exit conference, did the Compliance Coordinator and other members of the monitoring team present themselves as fair and impartial? At the exit conference, did the Compliance Coordinator address preliminary compliance findings? | | | | | 7 |
| 6. Did district staff have ample time to ask questions? | | | | 2 | 10 |
| 7. Did the team clearly describe the follow up monitoring activities? | | | | 2 | 10 |
| 8. Do you feel comfortable contacting the Compliance Coordinator with any follow up questions? | | | | 1 | 11 |
| 9. Were the school based interviews and focus group sessions conducted in a professional manner? | | | * | | |
| 10. At the exit conference, did the lead monitor present himself/herself as fair and impartial? | | | * | | |
| 11. Did the lead monitor address preliminary compliance findings? | | | * | | |
| 12. Did you feel you were encouraged and given an opportunity to express your point of view? | | | * | | |
| 13. If you had any additional needs, or requests for assistance from the WVDE, were those needs addressed? | | | * | | |
| 14. Did district staff have ample time to ask questions? Were questions addressed as needed? | | | * | | |
| *Please see written responses for questions 9-14 of On-Site Monitoring Evaluation below: | | | | | |

***Evaluation Question # 9**

What are some ways that the OFP can improve the special education monitoring process?

- *None, everything was well organized and helpful!*
- *None, excellent process.*
- *Have more interview questions that are based on Results Driven Accountability (RDA).*
- *I thought everything went well no suggestions at this time.*
- *There could be a short meeting with the guest monitors on the evening before the first day of the on-site monitoring.*
- *Interview question to be a little clearer or easier to understand.*

***Evaluation Question # 10**

Do you believe that you have the capacity to correct all findings?

- *Yes.*
- *I do believe I can address and make all the corrections.*
- *Yes, I can make all the corrections.*

***Evaluation Question # 11**

What additional support would you recommend from the WVDE?

- *Co-Teaching training.*
- *Scheduling training.*

***Evaluation Question # 12**

Did the compliance coordinator clearly communicate information about scheduled monitoring activities prior to the monitoring visit? Was there any additional information that you would have liked to have?

- *Information was clearly communicated; however, with the latest revisions of the monitoring handbook, there are no guidelines for notification/consent for student focus group participation or invitation to parent focus group participants.*
- *Yes, I was contacted in advance, as well as, a reminder with details a few days prior.*
- *Yes, the agenda was clear. No further information was needed.*
- *Yes, the compliance coordinator did a great job leading the team.*
- *Everything was well communicated.*
- *Yes, well communicated.*
- *Yes!*
- *Yes, schedule was sent in advance.*
- *Very clear, compliance coordinator was great to work with!*

***Evaluation Question # 13**

What do you believe are the greatest obstacles for your district in regards to improving student achievement? What additional support could the WVDE provide to assist you in overcoming those barriers?

- *One of the greatest challenges would be changing standards, both Next Generation and AAAS and the associated PD necessary for teachers to become knowledgeable and proficient. The school calendar does not provide for adequate CE for high quality PD.*
- *Data used to be utilized for making decisions and not teacher made tests.*
- *Instructional leadership (principals), staff turnover, and uncertified teachers. More need for alternative certification.*

***Evaluation Question # 14**

Do you have any additional comments?

- *This was a positive experience for me and allowed me to obtain some ideas to take back to my county. Thanks!*
- *I really enjoyed being a guest monitor. Thank you for the opportunity.*
- *Truly and enjoyable experience in which I gained valuable knowledge.*
- *Learned a lot, it was a great experience.*
- *Really appreciated the opportunity to gain this experience.*

West Virginia Interagency Consolidated Monitoring of Out-of-State Residential Facilities

The West Virginia Legislature created The Commission to Study Residential Placement of Children to establish a mechanism to achieve systemic reform by which all of the state's child-serving agencies involved in the residential placement of at-risk youth jointly and continually study and improve upon this system. One of the topics of study the legislation outlined when it formed the Commission, was to develop ways to certify out-of-state providers to ensure that children who must be placed out-of-state receive high quality services consistent with this state's standards. As part of this charge, the West Virginia Department of Health and Human Resources (WVDHHR) and the West Virginia Department of Education (WVDE) have joined efforts to develop and implement a collaborative monitoring system to review out-of-state facilities providing treatment and educational services to West Virginia youth.

For students with disabilities, each state has a responsibility, under federal statute and regulation, to have a system of general supervision that monitors the implementation of IDEA. The educational monitoring of out-of-state facilities began April 2002 by the WVDE. In 2012, an interagency team, WVDE and WVDHHR developed the interagency consolidated monitoring process and developed a manual, which describes the procedures to thoroughly and consistently monitor out-of-state facilities servicing WV students to ensure appropriate treatment and educational series are being provided in a safe environment. The team representing the WVDE and WVDHHR conducts on-site reviews of facilities out-of-state that are providing services for West Virginia students. A consolidated written report is issued to the facility administrator following the exit conference. Each report consists of recommendations for educational improvement, any child-specific and/or systemic findings of noncompliance under IDEA, WV state policies, WV state and federal codes, WVDHHR rules, policies and procedures. Corrective action plans are imposed when appropriate. In addition, at the conclusion of the on-site monitoring and in the event suspension of placements or removal of members/students is ordered, the entire review team will return for a second on-site monitoring visit to determine the facility's capacity to correct the deficiencies.

The interagency team completed four (4) on-site reviews for the 2014-2015 school year. The facilities which received an on-site review were:

- Youth Educational System - PA
- George Junior Republic of PA - PA
- Leary Educational Foundation, dba TimberRidge School - VA
- Summit Academy, Inc. – PA

Leary Educational Foundation and Summit Academy received Corrective Action Plans and Youth Educational System and George Junior Republic of PA placements were suspended and members/students ordered removed.

Annual Desk Audit (ADA) Compliance Indicators

The ADA is submitted electronically each year on April 30, and is a review of both compliance and results SPP Indicators. Districts with less than 100% on compliance indicators will receive written notice of noncompliance on or before May 31. Each ADA indicator determined Not Met requires completion of an improvement plan to be reviewed and accepted by the OSP. Thirty eight (38) districts received written notification of noncompliances identified in the ADA Report for the compliance SPP indicators. The noncompliance data (compliance indicators only) is reported below:

- Five (5) districts were identified as noncompliant for Indicator 4B: Suspension by Race/Ethnicity. *Rates of suspension and expulsion: Percent of districts that have: (a) a significant discrepancy, by race or ethnicity, in the rate of suspensions and expulsions of greater than 10 days in a school year for children with IEPs; and (b) policies, procedures or practices that contribute to the significant discrepancy and do not comply with requirements relating to the development and implementation of IEPs, the use of positive behavioral interventions and supports, and procedural safeguards.*
- Thirty-four (34) districts identified as noncompliant for Indicator 11: Child Find. *Percent of children who were evaluated within 80 days of receiving parental consent for initial evaluation.*
- Six (6) districts identified as noncompliant for Indicator 13: Secondary Transition. *Percent of youth age 16 and above with an IEP that includes appropriate measureable postsecondary goals that are annually updated and based upon an age appropriate transition assessment, transition services, including courses of study, that will reasonably enable the student to meet those postsecondary goals, and annual IEP goals related to the student's transition services needs. There also must be evidence that the student was invited to the IEP Team meeting where transition services are to be discussed and evidence that, if appropriate, a representative of any participating agency was invited to the IEP Team meeting with the prior consent of the parent or student who has reached the age of majority.*

Local Educational Agency Determinations

IDEA Section 616(e) and Part B Regulations §300.600(a) and §300.604 require states to annually determine if the LEA:

- Meets the requirements and purposes of IDEA, Part B;
- Needs assistance in implementing the requirements of Part B;
- Needs intervention in implementing the requirements of Part B; or
- Needs substantial intervention in implementing the requirements of Part B.

In making each LEA's Annual Determination, the Office of Special Education used a Results/Compliance matrix. The four (4) factors considered were:

- District's performance on selected SPP results and compliance indicators;
- Valid and reliable data;
- Correction of identified noncompliance; and
- Other data available to the State about the LEA's compliance, including relevant audit findings.

Local Educational Agency (LEA) Annual Determination Worksheet County

| Part B Results Matrix | | | | | |
|--|-------------------------------------|-------------------|-------------------------------|------------------------|-------|
| Part B Results Indicators | State Performance Plan (SPP) Target | SWD State Average | LEA Percentage | Score | |
| Indicator 1: Graduation | 67.08% | 70.25% | 76.00% | 1 | |
| Indicator 2: Drop Out | 2.45% | 1.47% | 2.25% | 1 | |
| Indicator 3b: Participation Rate/Reading | 95.00% | 97.89% | 99.13% | 1 | |
| Indicator 3b: Participation Rate/Math | 95.00% | 97.80% | 99.57% | 1 | |
| Indicator 3c: Assessment Data/Reading Proficiency | 32.90% | 16.12% | 11.84% | 0 | |
| Indicator 3c: Assessment Data/Math Proficiency | 35.70% | 17.56% | 12.66% | 0 | |
| Indicator 4a: Suspension/Expulsion (more than 10 days) | < 3.28% | < 3.28% | 0.47% | 1 | |
| Indicator 5a: Educational Environment General Education Full Time (6-21) | 62.50% | 64.0% | 75.31% | 1 | |
| Indicator 5b: Educational Environment Separate Class (6-21) | 8.90% | 8.20% | 6.48% | 1 | |
| Indicator 5c: Educational Environment | 1.40% | 1.74% | 1.00% | 1 | |
| Indicator 6a: Preschool Environments (Regular Early Childhood Program) | 29.80% | 26.16% | 66.67% | 1 | |
| Indicator 6b: Preschool Environments (Separate Special Education) | 10.60% | 9.45% | 0.00% | 1 | |
| Indicator 7a: Preschool Outcomes (Social-Emotional Skills) | A1. 78.00% | 81.68% | 77.78% | 0 | ½ |
| | A2. 67.00% | 67.34% | 90.91% | ½ | |
| Indicator 7b: Preschool Outcomes (Knowledge & Skills) | B1. 78.00% | 81.55% | 80.00% | ½ | 1 |
| | B2. 63.00% | 63.49% | 81.82% | ½ | |
| Indicator 7c: Preschool Outcomes (Appropriate Behavior) | C1. 79.00% | 83.54% | 83.33% | ½ | 1 |
| | C2. 78.00% | 77.90% | 90.91% | ½ | |
| Indicator 8: Parent Involvement | 33.00% | 31.63% | | | |
| Indicator 14c: Higher Education/Post-Secondary/Competitively Employed | 64.00% | 64.89% | 60.00% | 0 | |
| Results Points Available | Results Points Earned | | Results Performance | | |
| 16 | 12.5 | | 78% Needs Assistance | | |
| Part B Compliance Matrix | | | | | |
| Part B Compliance Indicators 0% or 100% | State Performance Plan (SPP) Target | SWD State Average | LEA Percentage | Correction of Findings | Score |
| Indicator 4b: Suspension by Race/Ethnicity | 0.00% | 3.51% | Met | N/A | 2 |
| Indicator 9: Disproportionality/All Disabilities | 0.00% | 0.00% | Met | N/A | 2 |
| Indicator 10: Disproportionality/Specific Disabilities | 0.00% | 0.00% | Met | N/A | 2 |
| Indicator 11: Initial Evaluation Timelines | 100.00% | 97.28% | 84.78% | Yes | 0 |
| Indicator 12: Preschool Transition | 100.00% | 100.00% | 100.00% | N/A | 2 |
| Indicator 13: Secondary Transition | 100.00% | 98.41% | 100.00% | Yes | 2 |
| Correction of Noncompliance | 100.00% | | 100.00% | | 2 |
| Timely and Accurate Data | 100.00% | | 100.00% | | 2 |
| Compliance Points Available | Compliance Points Earned | | Compliance Performance | | |
| 16 | 14 | | 88% Meets Requirements | | |
| Results Driven Accountability Percentage and Determination | | | | | |
| 32 | 26.5 | | 83% Meets Requirements | | |

There were 32 possible points on both Results and Compliance indicators. The Results/Compliance matrix reflects a percentage score that was used to determine the LEA's 2015 Annual Determination as follows:

- Meets Requirements: A LEA's 2015 Annual Determination is Meets Requirements if the matrix percentage is at least 80%.
- Needs Assistance: A LEA's 2015 Annual Determination is Needs Assistance if the matrix percentage is less than 80%.
- Needs Intervention: A LEA's 2015 Annual Determination is Needs Intervention if the total matrix percentage is less than 80%, and the LEA was determined to be in Needs Assistance for more than two consecutive years (2013-2014).
- Needs Substantial Intervention: The State did not make a determination of Needs Substantial Intervention for any LEA in 2015.

The following is a summary of the districts Local Educational Agency Determinations status:

- Meets Requirements: 42 districts
- Need Assistance – One Year: 4 districts
- Needs Assistance – Two Years: 5 districts
- Needs Assistance – Three Years: 5 districts
- Needs Intervention: 1 district

Dispute Resolution System

School districts and parents may have disagreements regarding students with exceptionalities and they need to make every effort to resolve their differences. For those cases when it is not possible to informally resolve a disagreement, the OFP is required to administer a system for written complaints, due process hearings and mediations regarding the identification, evaluation, placement and/or provision of FAPE for students with exceptionalities. A state complaint is a charge that special education laws or regulation are not being followed by a county school district or public agency. A complaint also may address a district's failure to implement a due process hearing decision. A due process hearing provides a forum to have an impartial hearing officer settle disagreements. Parents and school districts are encouraged to use mediation, which is less formal than a complaint or a due process hearing, to resolve a disagreement.

State Complaints:

| | |
|---|----|
| Total number of state complaints requested | 40 |
| Total number of state complaints determined insufficient..... | 8 |
| Total number of state complaints where agreement was reached through early resolution | 5 |
| Total number of state complaints where agreement was reached through mediation..... | 5 |
| Total number of state complaints where issues were deferred pending due process..... | 2 |
| Total number of Letters of Findings issued | 20 |

Mediations:

| | |
|--|----|
| Total number of mediations requested | 14 |
| Total number of written agreements | 10 |
| Total number of mediations without agreements or withdrawn | 4 |

Due Process Hearings:

| | |
|--|----|
| Total number of due process hearings requested | 15 |
| Total number of cases dismissed (closed due to a resolution meeting, mediation agreement, withdrawal or other resolution without having a hearing) | 14 |
| Total number of cases resulting in a decision by a hearing officer | 1 |

State Complaints

The federal regulations for implementing Part B of IDEA 2004 require each state to administer a complaint system for investigating and resolving state complaints. A formal state complaint is a charge that special education laws or regulations are not being followed by a district or public agency.

An individual or organization may file a state complaint under the procedures described in Policy 2419, Chapter 11. The WVDE has made available a form for filing a state complaint which can be accessed at the Department's homepage. Although the use of this form is not required, the complaint must be in writing, contain the complainant's original signature and meet the criteria specified in Chapter 11, Section 1.A.

The WVDE has adopted written procedures for responding to and investigating state complaints and widely disseminates these procedures to parents and other interested individuals including parent training and information centers, protection and advocacy agencies, independent living centers and other appropriate entities in the state.

Within sixty days of receipt of a state complaint, the WVDE must carry out an independent investigation if the WVDE determines the state complaint is sufficient. Upon review of all relevant information, the WVDE must make an independent determination as to whether the public agency is violating state or federal special education laws or regulations. The WVDE issues a written decision to the district and the parent that addresses each allegation in the complaint and contains findings of facts and conclusions, the reasons for the WVDE's final decision, and procedures for effective implementation of the WVDE's final decisions, if needed, including corrective actions to achieve compliance.

State Complaints and Due Process Complaints

If a written state complaint is received that is also the subject of a due process complaint, or contains multiple issues of which one or more are part of the due process complaint, the WVDE shall set aside any part of the state complaint that is being addressed in the due process complaint until the conclusion of the hearing. Any issue that is not a part of the due process action will be resolved following the established state complaint procedures and timelines. For issues that are addressed in the due process hearing, the hearing officer's decision is binding on those issues and the WVDE must inform the complainant to that effect. Any remaining issues not addressed in the due process hearing decision will be investigated upon receipt of the hearing decision by the WVDE in accordance with the established state complaint procedures and timelines.

A state complaint alleging a district's failure to implement a due process hearing decision must be investigated and resolved by the WVDE utilizing the state complaint procedures.

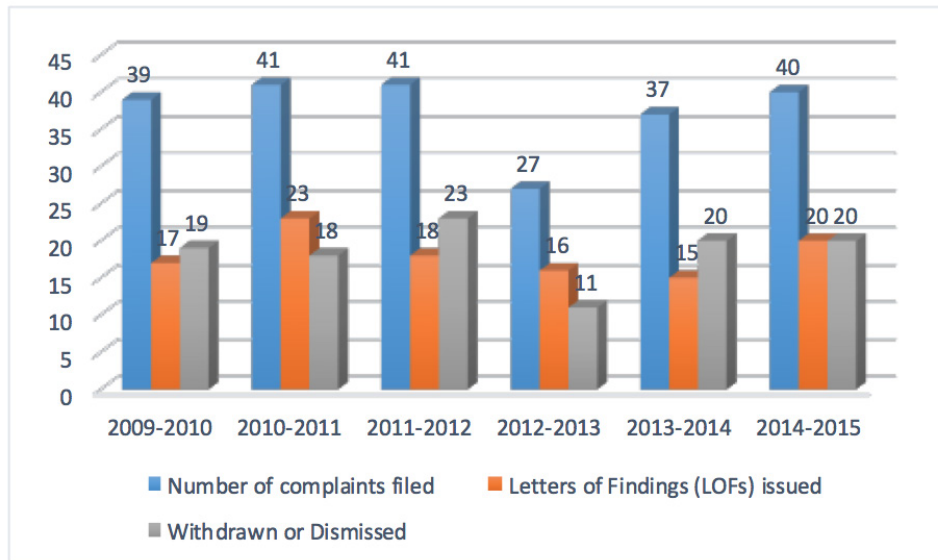
Early Resolution of State Complaints

Either the special education director or the parent/adult student may request early resolution to a state complaint investigation by contacting the other party and participating in a local conference if both the district and parent voluntarily agree to utilize the early resolution option. If early resolution is reached on any or all allegations within fifteen days of being notified of the receipt of the state complaint, the school district need not submit its written response to the allegations to the WVDE, and the state complaint will be considered resolved. Allegations not resolved will be investigated using these procedures and timelines.

Mediation and State Complaints

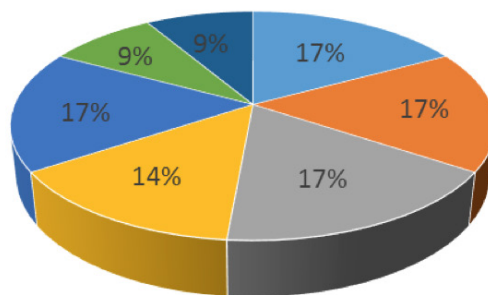
Another option for resolving the issues in the complaint is mediation. The parent and the district may agree to voluntarily engage in mediation consistent with the Department's procedures as a means to resolve the issues in the complaint. If both parties agree to mediate, the timeline may be extended if agreed upon by the parent and the district. If a mediation agreement is reached, the decisions are documented in a settlement agreement and the complaint is considered resolved. A settlement agreement is binding in any court of competent jurisdiction.

State Complaint Trend Data



An analysis of data over a six (6) year period indicates a fairly consistent number of formal state complaints were submitted to the WVDE by parents and other non-parent complainants, with a significant decrease between the 2012-13 and 2013-14 school years and slight increases from 2013-14 and 2014-15, respectively. Additionally, the current year's data indicate twelve cases were withdrawn based on resolutions, either through the early resolution process or through settlement agreements resulting from mediations requested by the parents or district and agreed upon by both parties. Eight (8) others were dismissed based on insufficient content. It appears these forms of resolution are being utilized far more often than due process hearings (and resolution sessions) to resolve the issues alleged in the letters of complaint.

Prevalence of Violations in State Complaint Investigations 2014-2015



- IEP Implementation
- FAPE
- Provision of Services
- Considerations of Factors in IEP Development
- LRE & Placement Decisions
- Provision of IEP Information
- Invitation to IEP Team Meetings

Mediation

Mediation is an informal process for assisting parents and local educational agencies (LEAs) to resolve disputes and reach agreements. Mediation is voluntary on the part of both parties and opens lines of communication which will benefit the student, parents and school personnel throughout the student's school life. Hopefully, when mediation is used, parents and schools may have the opportunity to resolve their differences amicably, make decisions with the student's best interest in mind and therefore, reduce the need for litigation. Parents and LEAs are encouraged to use mediation, which is less formal than a due process hearing, to resolve a disagreement. Mediation can be a winning situation for all involved.

Mediations Requested

| Local Educational Agency | Number of Mediations Requested | Number of Mediations Requested in Lieu of Resolution Meetings | Mediation Withdrawn | Mediation Agreement | Mediation Without Agreement |
|--------------------------|--------------------------------|---|---------------------|---------------------|-----------------------------|
| Barbour | 1 | | | 1 | |
| Berkeley | 1 | | | 1 | |
| Cabell | 1 | | 1 | | |
| Fayette | 1 | | | 1 | |
| Grant | 1 | | 1 | | |
| Hampshire | 1 | | 1 | | |
| Marshall | 1 | | | 1 | |
| Monroe | 2 | | | 2 | |
| Monongalia | 1 | | | 1 | |
| Morgan | 1 | | 1 | | |
| Putnam | 1 | | | 1 | |
| Wayne | 1 | | 1 | | |
| Wyoming | 1 | | | 1 | |
| Totals | 14 | | 5 | 9 | |

Mediations Requested by Month

| Month | Mediations Requested |
|--------------|----------------------|
| July | 1 |
| September | 2 |
| October | 6 |
| November | 1 |
| February | 1 |
| March | 1 |
| April | 1 |
| June | 1 |
| Total | 14 |

Mediation Issues Chart

| Case Number | Mediation Issues | Mediation Agreement |
|-------------|--|---------------------|
| M15-001 | The parent was unable through the IEP process to resolve issues related to the student's report card and the participation in the standardized test. | Withdrawn |
| M15-002 | <p>The district and the parent agreed to waive the resolution meeting and participate in mediation to attempt to resolve the facts that form the basis of the due process complaint.</p> <p>The issue filed in the due process complaint was a denial of a free and appropriate public education (FAPE), therefore the student was unilaterally placed in a private school out-of-state.</p> | Agreement |
| M15-003 | <p>The parent requested mediation to resolve the issues in State Complaint C15010.</p> <p>The issues filed in the complaint were: 1) did the district follow policies and procedures when inviting an agency representative to the student's October 13, 2013 IEP Team meeting; 2) conduct the student's reevaluation within three years of the date of the last Eligibility Committee (EC) meeting; 3) request additional evaluations; 4) follow policies and procedures regarding the parent's absence at the Student's February 26, 2014 IEP Team meeting; and 5) develop an IEP to meet the student's needs during the 2013-214 school year, specifically the modifications for reading class.</p> | Agreement |
| M15-004 | <p>The district requested mediation to resolve the issues in State Complaint C15016.</p> <p>The issues filed were: 1) was there a denial of FAPE as a result of bullying/harassment; 2) was there disagreement with the IEP which changed the placement to OSE; 3) was a copy of the IEP provided to staff providing services; 4) has the district implemented the OSE placement; and 5) was the student's reevaluation completed within the required timelines.</p> | Agreement |
| M15-005 | The parent requested mediation to resolve the issue that the student's IEP did not provide FAPE in the least restrictive environment (LRE). | Agreement |
| M15-006 | The district requested mediation regarding the issue of eligibility of Section 504 vs Special Education. | Agreement |
| M15-007 | The district requested mediation regarding the lack of parental participation in the IEP Team meeting to discuss current evaluations. | Agreement |
| M15-008 | The parent requested mediation regarding a denial of FAPE. | Withdrawn |

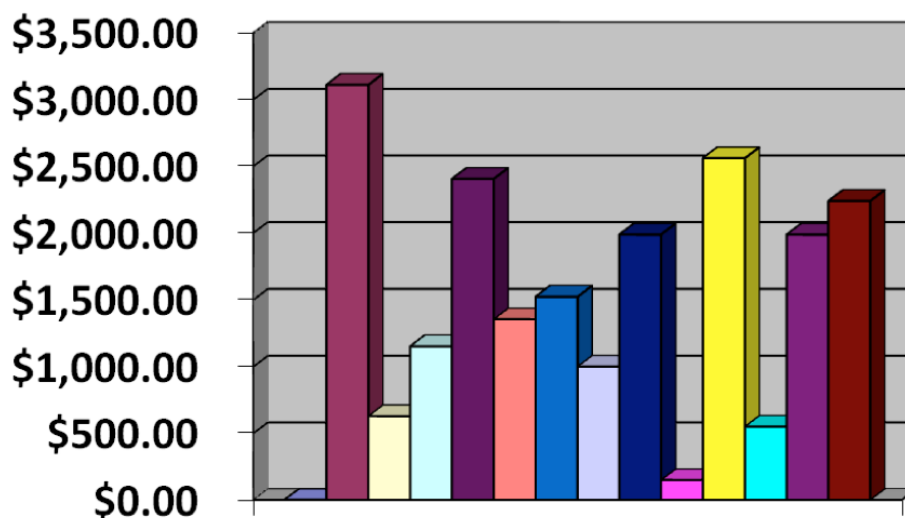
| | | |
|------------------------------------|---|---|
| M15-009 | The parent requested mediation to resolve the issue of an outcome based education and an evaluation. | Withdrawn |
| M15-010 | The district requested mediation to resolve the State Complaint C15022. The issue was: did the district provide Supplementary Aids and Services and Related Services as stated on the Student's IEP; specifically, the provision of continuous adult supervision with medical licensure provided daily? | Agreement |
| <i>CMS Program Skipped M15-011</i> | | |
| M15-012 | The district requested mediation to resolve the issue that the principal not attend the student's IEP Team meeting and permit the parent to select the student's teacher for the next school year. | Agreement |
| M15-013 | The parent wished to have her child continue with homebound services and graduate. | Withdrawn <i>*Agreement reached before mediation held.</i> |
| M15-014 | The parent requested mediation to resolve the issues in State Complaint C15033. The issues were: 1) has the district conducted an IEP Team meeting in compliance with the membership requirements; 2) has the district followed the procedures for conducting an amendment to the student's IEP; 3) has the district provided qualified personnel to implement the student's IEP; 4) has the district provided qualified personnel to implement the student's IEP; specifically, the provision of speech therapy; and 5) has the district implemented the student's IEP, Specifically, the provision of staff training and maintaining and monitoring the FM System. | Agreement |
| M15-015 | The district requested mediation to resolve the issues in State Complaint C15038. The issues were: 1) has the district considered the physician's orders for the student; 2) has the district provided the student a full instructional day; and 3) has the district implemented the student's IEP; specifically, the behavior intervention plan and the provision of special education services in the specified locations. | Agreement |

Note: Mediations requested totaled 14.

Mediation Costs

The West Virginia Department of Education, Office of Federal Programs (OFP) assumes the total cost of the mediator assigned to the requested mediation. Mediators enter into an annual Service Agreement to conduct the mediation pursuant to the procedures specified in the Individuals with Disabilities Education Improvement Act (IDEA 04) and Policy 2419: Regulations for the Education of Students with Exceptionalities. The mediators are compensated at the rate of \$100.00 per hour for preparation and conducting the mediation and half-rate for travel time. Total mediation costs for FFY 15 were \$20,320.56. The chart below is a breakdown of mediation costs by case.

| Case Number | Cost |
|--------------------|--------------------|
| M15001 | No Charge |
| M15002 | \$3,110.60 |
| M15003 | \$628.96 |
| M15004 | \$1,150.76 |
| M15005 | \$150.00 |
| M15006 | \$2,404.54 |
| M15007 | \$1,354.12 |
| M15008 | \$1,522.73 |
| M15009 | \$1,000.00 |
| M15010 | \$1,987.90 |
| M15011 | Number Skipped |
| M15012 | \$2,560.87 |
| M15013 | \$550.00 |
| M15014 | \$1,987.90 |
| M15015 | \$2,241.40 |
| Total Costs | \$20,320.56 |



Mediation Survey Responses

Mediation holds great promise for assisting parents, students, school districts and others in developing solutions to resolve disputes. Parents and school personnel have different perspectives on how well the mediation worked and its outcomes. The intent of this section is to capture the perspectives of those individuals participating in the mediation process and provide valuable data on how to increase the access, use and success of the mediation process. The evaluation of the mediation system helps ensure the services are continually improved and refined; thereby, enhancing the likelihood that mediation will be effective and utilized to the greatest degree possible.

The chart below provides a summary of the survey responses received from parents and school districts from July 1, 2014, through June 30, 2015. Ten (10) mediations were conducted and four (4) mediations were withdrawn during FFY 2014-15. A total of Five (5) surveys were returned to the OFP; however all surveys returned were from the districts. The OFP did not receive any surveys returned from the parents who participated in mediation.

Mediation Survey Summary

| Questions | District |
|---|--|
| In general, how did you feel about the Mediation/Due Process Hearing Programs? | <ul style="list-style-type: none"> • 4 Very Satisfied • 1 Satisfied |
| Was there any kind of help you expected or needed from the WVDE that you did not receive? | <ul style="list-style-type: none"> • 5 No |
| How clear was the Mediator/Hearing Officer in explaining the process to you? | <ul style="list-style-type: none"> • 4 Completely Clear • 1 Fairly Clear |
| Did the Mediator/Hearing Officer Obtain your trust and confidence? | <ul style="list-style-type: none"> • 4 Completely Understood • 1 Partially Understood |
| Did the Mediator/Hearing Officer understand the issues and the conflict? | <ul style="list-style-type: none"> • 4 Completely Understood • 1 Partially Understood |
| Was the Mediator/Hearing Officer impartial? | <ul style="list-style-type: none"> • 5 Yes |
| Do you feel you were encouraged and given an opportunity to express your point of view? | <ul style="list-style-type: none"> • 4 Yes • Somewhat |
| Do you feel that the other participants were encouraged and given an opportunity to express their point of view? | <ul style="list-style-type: none"> • 5 Yes |
| Did the Mediator/Hearing Officer control the parties' conduct so that everyone was given ample time to appropriately express himself/herself? | <ul style="list-style-type: none"> • 4 Yes • 1 No |
| Did the Mediator/Hearing Officer make him/herself available to hear emergency matters? | <ul style="list-style-type: none"> • 5 Yes |
| Did the Mediator make it clear that any decision or decisions were up to the parties involved? | <ul style="list-style-type: none"> • 4 Completely Clear • 1 Fairly Clear |
| How satisfied were you with the particular results of your mediation agreement? | <ul style="list-style-type: none"> • 4 Very satisfied • 1 satisfied |
| Do you feel communication between the parties has improved after the mediation process was completed? | <ul style="list-style-type: none"> • 2 Somewhat improved • 2 Much improved • 1 Improved |

| | |
|--|--|
| Would you recommend mediation as a dispute resolution process for special education issues? | <ul style="list-style-type: none"> • 2 Yes • 3 Wholeheartedly |
| Were other issues resolved between the parties that were not originally identified? If so, what were the issues? | <ul style="list-style-type: none"> • No • Yes – LEA obtained a parent evaluation report. |
| Generally speaking, what issue originally caused you to request mediation? Was the issue resolved? | <ul style="list-style-type: none"> • Parent request – issue was resolved. • Parent requested it. • Ongoing difficulty getting timely parent participation in IEP meetings. |
| If the mediation was not successful, what do you consider to be the reasons for the failure? | No comments |
| If this dispute or related issues arose again, what method of dispute resolution would you pursue? | <ul style="list-style-type: none"> • Mediation • Mediation or early resolution process |
| General comments: | <ul style="list-style-type: none"> • The mediator kind of just sat back and had everyone else do all the work. He had the advocate to fill out all the paperwork for the agreement – the director completed the notes for the agreement and then went in and explained it instead of him. This also took a long time which I didn't feel was necessary. He should have professionally sought to speed it up. It was scheduled for 10:00 and didn't end until 6:00pm. • Very productive process!! |

Due Process Hearing

Special education laws and regulations ensure that all students with exceptionalities have available a free appropriate public education. The West Virginia Department of Education (WVDE), Office of Federal Programs (OFP), is required to receive due process complaints regarding the identification, evaluation, educational placement and/or provision of FAPE for exceptional students. Due process complaints and hearings are important procedural safeguards for parents and are required by federal law. A parent, an adult student with an exceptionality, a school district or an attorney representing a party may request a due process complaint regarding the school district's proposal or refusal to initiate or change the identification, evaluation, educational placement and/or the provision of FAPE to the student.

Due Process Complaint Resolution Meeting

In the Individuals with Disabilities Education Act (IDEA), Congress recognized the need to provide additional opportunities for early dispute resolution. A 30-day resolution period was added when a parent files a due process complaint. The LEA holds a resolution meeting within 15 days of receiving notice of the parents' due process complaint to discuss the issues leading to their due process hearing request, which provides the LEA an opportunity to resolve the issues. The parents and LEA decide which IEP Team members will attend the resolution meeting. However, a LEA representative who has decision-making authority for the LEA must participate in the resolution meeting. The resolution meeting must be held unless the parents and LEA agree in writing to waive the resolution meeting or agree to use mediation. If the LEA and parents resolve the request for the due process hearing during a resolution meeting, they must execute a legally binding agreement. If the LEA has not resolved the request for the due process hearing to the satisfaction of the parents within 30 days of the receipt of the parents' hearing request, the due process hearing may proceed and all of the applicable timelines for a due process hearing begin.

IDEA 2004 is silent regarding the confidentiality of resolution discussions. There is nothing in IDEA 2004 or the regulations that would prohibit the parties from entering into a confidentiality agreement at the beginning of the resolution meeting or as a part of their resolution agreement. A state cannot, however, require that the participants in a resolution meeting keep the discussions confidential or make a confidentiality agreement a condition of a parent's participation in the resolution meeting.

Due Process Complaints Requested by Month

| Month | Number Requested |
|--------------|------------------|
| July | 0 |
| August | 0 |
| September | 3 |
| October | 1 |
| November | 3 |
| December | 0 |
| January | 0 |
| February | 2 |
| March | 1 |
| April | 3 |
| May | 1 |
| June | 1 |
| Total | 15 |

IDEA Due Process Hearing Decisions Summary Report by District

| Local Educational Agency | Number of Hearings Requested | Withdrawn/Resolution Agreement/Mediation/Due Process Decision |
|--------------------------|------------------------------|---|
| Berkeley | 4 | 4 Resolution Agreements |
| Brooke | 1 | Withdrawn |
| Fayette | 1 | Resolution Agreement |
| Jefferson | 1 | Resolution Agreement |
| Kanawha | 1 | Resolution Agreement |
| Logan | 1 | Withdrawn |
| Monongalia | 1 | Mediation Agreement |
| Morgan | 2 | 2 Resolution Agreements |
| Putnam | 1 | Due Process Decision – Parent Prevailed |
| Raleigh | 2 | 1 Resolution Agreement 1 Withdrawn |

Of the due process hearing complaints filed for FFY 15, one due process hearing complaint was fully adjudicated. The 45 day timeline after the expiration of the resolution thirty-day period or adjusted timelines was extended beyond the required timeline at the request of either party and the approval of the hearing officer. The decision was issued on June 8, 2015 in 115 calendar days. In addition, of the Due Process Complaints filed with the OFP, the parties were able to resolve eleven (11) through the resolution process or mediation.

IDEA Due Process Hearing Complaint Issues

| Case Number | Alleged Violation | Action |
|-------------|---|--|
| D15001 | <p>The student was denied a free appropriate public education (FAPE) during the 2012-2013 and the 2013-2014 School Years in reading instruction, social skills, implementation of the behavioral plan and a legally sufficient triennial evaluation (or evaluation plan).</p> <p>(Pro Se)</p> | <p>Withdrawn <i>Resolution reached outside of the formal resolution process.</i></p> |
| D15002 | <p>The district failed to provide FAPE to a transfer student and hold an eligibility committee meeting within the required timelines.</p> <p>The district failed to follow the student's behavior intervention plan and hold a manifestation determination meeting.</p> <p>The district failed to provide appropriate special education and related services.</p> <p>(Legal Aid of West Virginia)</p> | <p>Resolution Session Agreement</p> |
| D15003 | <p>The district failed to provide a copy of the parent's Procedural Safeguards, consideration of the parentally obtained evaluations, and the prior written notice requirements.</p> <p>(Pro Se)</p> | <p>Resolution Session Agreement</p> |
| D15004 | <p>The district failed to provide FAPE, therefore the parent informed the district of the unilateral placement in a private school.</p> <p>(Hedges, Lyons & Shepherd, PLLC)</p> | <p>Withdrawn <i>Mediation Agreement M15002</i></p> |
| D15005 | <p>The parent was in disagreement with the IEP Team decision to place the student in a more restrictive placement (self-contained classroom).</p> <p>(Pro Se)</p> | <p>Resolution Session Agreement</p> |
| D15006 | <p>The parent was in disagreement with the Eligibility Committee (EC) which determined the student was not eligible for special education and related services.</p> <p>(Pro Se)</p> | <p>Resolution Session Agreement</p> |
| D15007 | <p>The district did not provide the student with FAPE and did not reimburse the parent for an independent evaluation.</p> <p>(Pro Se)</p> | <p>Resolution Session Agreement</p> |

| | | |
|-----------------------|---|--|
| D15008 (Expedited) | The district requested an expedited Due Process Hearing to consider a change in placement to maintain the safety of the student and others. (Bowles Rice Attorneys' At Law) | Withdrawn <i>Resolution reached outside of the formal resolution process.</i> |
| D15009 | The district has denied the student FAPE, therefore the parent is requesting continued placement at an out-of-state program as a day student. (Nancy Dalby, Esq.) | Resolution Session Agreement |
| D15010 | The parent is in disagreement with the student's homebound placement. (Nancy Dalby, Esq.) | Resolution Session Agreement |
| D15011 | The district failed to provide FAPE to a transfer student and develop an IEP for the student within required timelines. (Legal Aid of West Virginia) | Resolution Session Agreement |
| D15012 | The school district denied the student the right to be educated with children who did not have disabilities to the maximum extent appropriate? The school district has denied the student a FAPE? The school district has violated the student's rights under Section 504 of the Rehabilitation Act? (Mountain State Justice, Inc. and Reisman, Carolla Gran, LLC) | Due Process Hearing Decision (parent prevailed) |
| D15013 | The parent is in disagreement with placement in a self-contained behavioral disorder classroom not located at the student's home school. The parent has also requested "stay put" until the issues are resolved. (Farrell, White & Legg, PLLC) | Withdrawn <i>Resolution reached outside of the formal resolution process.</i> |
| D15014 | The district failed to provide parent participation in the IEP Team scheduled for 4/15/2015. (Pro Se) | Resolution Session Agreement |
| D15015 | The district did not implement the accommodations and supports as specified in the student's IEP which resulted in regression. The district denied the parent's request for an IEE. (The Lane Law Firm) | Resolution Session Agreement |

IDEA Due Process Hearing Costs

The WVDE has entered into a contractual agreement for due process hearing officer services at the rate of \$125.00 per hour for preparation, conducting the hearing and decision writing and half-rate for travel time. The WVDE remits payment to the hearing officer for 2/3 of the approved cost of the hearing officer's fee and 100% of approved expenses. The district remits payment to the hearing officer for 1/3 payment of the approved cost of the hearing officer's fee within 30 calendar days of receipt of the approved invoice. When a hearing is not held, settled or dismissed, the hearing officer is only paid for time accrued, which is considerably less than when a hearing occurs. In addition, the WVDE is responsible for the 100% cost of a court reporter for the due process hearing. The court reporter is required to complete a hearing transcript within five (5) to ten (10) business days after the hearing. The district is responsible for the cost of the district's attorney.

Due process hearing officer fees ranged from \$175.25 to \$16,115.24. The court reporter costs paid by the WVDE was \$4,410.25 for one (1) hearing. The length of the one hearing fully adjudicated was 3 days with three issues. The total cost of the due process complaints for FFY 2015 including the cost of the court reporter services was \$39,847.34. The chart below represents the specific data and summary of the total costs for each due process complaint filed.

IDEA Due Process Hearing Costs

| Case Number | WVDE Hearing Cost | LEA Cost | WVDE Court Reporter Cost | Total Hearing Cost |
|--------------------|--------------------|--------------------|--------------------------|--------------------|
| D15001 | \$2,005.00 | \$1,000.00 | | \$3,005.00 |
| D15002 | \$833.33 | \$416.67 | | \$1,250.00 |
| D15003 | \$833.33 | \$416.67 | | \$1,250.00 |
| D15004 | \$1,905.00 | \$950.00 | | \$2,855.00 |
| D15005 | \$333.33 | \$166.67 | | \$500.00 |
| D15006 | \$244.30 | \$112.50 | | \$356.80 |
| D15007 | \$1,155.00 | \$575.00 | | \$1,730.00 |
| D15008 | \$500.00 | \$250.00 | | \$750.00 |
| D15009 | \$243.13 | \$116.67 | | \$359.80 |
| D15010 | \$1,446.67 | \$720.83 | | \$2,167.50 |
| D15011 | \$583.33 | \$291.67 | | \$875.00 |
| D15012 | \$10,965.24 | \$5,150.00 | \$4,410.25 | \$16,115.24 |
| D15013 | \$1,455.00 | \$725.00 | | \$2,180.00 |
| D15014 | \$123.17 | \$52.08 | | \$175.25 |
| D15015 | \$1,246.67 | \$620.83 | | \$1,867.70 |
| Total Costs | \$28,282.75 | \$11,564.59 | \$4,410.25 | \$39,847.34 |

Summary

Compliance Issues in Monitoring, Written Complaints, Mediations and Due Process Hearing Decisions

Comprehensive On-Site Monitoring

- Continuum of Services
- Instructional Groupings
- Certification/Caseloads
- Classroom Location & Size

Student File Review

- IEP Amendment
- IEP Participation and Development
- Assessment
- Discipline Procedures
- Service Verification

Issues that prompted written complaints:

- IEP Implementation
- FAPE
- Provision of Services
- Consideration of Factors in IEP Development
- LRE & Placement Decisions
- Provision of IEP Information
- Invitation to IEP Team Meetings

Issues that prompted mediation:

- IEP Development
- Report Card and Standardized Testing
- Unilateral Placement
- Reevaluation Timelines
- Bullying/Harassment
- Copy of IEP for staff implementing services
- FAPE in the LRE
- Eligibility
- Parent Participation
- IEP Team Membership

Issues that prompted due process hearings:

- Identification
- Educational Placement (LRE)
- FAPE
- Regression of Student
- IEE
- Functional Behavior Assessment
- One-on-One Aide
- Private/Out-of-State Placements

12/31/15

Notes

ONE VOICE
ONE FOCUS
All Students Achieving



Michael J. Martirano, Ed.D.
State Superintendent of Schools