



UNITED STATES DEPARTMENT OF EDUCATION
OFFICE OF SPECIAL EDUCATION AND REHABILITATIVE SERVICES

OCT 4 2004

Honorable John Winn
Commissioner of Education
Florida Department of Education
Capitol Building Room PL 08
Tallahassee, Florida 32399-0100

Dear Commissioner Winn:

The purpose of this letter is to respond to the Florida Department of Education's (FDE's) March 31, 2004 submission of its Federal Fiscal Year (FFY) 2002 Annual Performance Report (APR) for the Individuals with Disabilities Education Act (IDEA) Part B funds used during the grant period July 1, 2002 through June 30, 2003. The APR reflects actual accomplishments made by the State during the reporting period, compared to established objectives. The APR for IDEA is designed to provide uniform reporting from States and result in high-quality information across States.

The APR is a significant data source utilized in the Continuous Improvement and Focused Monitoring System (CIFMS) implemented by the Office of Special Education Programs (OSEP), within the U.S. Department of Education. The APR falls within the third component of OSEP's four-part accountability strategy (i.e., supporting States in assessing their performance and compliance, and in planning, implementing, and evaluating improvement strategies) and consolidates the self-assessing and improvement planning functions of the CIFMS into one document. OSEP's Memorandum regarding the submission of Part B APRs directed States to address five cluster areas: General Supervision; Early Childhood Transition; Parent Involvement; Free Appropriate Public Education in the Least Restrictive Environment; and Secondary Transition.

Background

In its April 23, 2001 Monitoring Report,¹ OSEP identified the following areas of noncompliance:

General Supervision

1. FDE's monitoring system was not effective in identifying and correcting noncompliance with Part B (34 CFR §300.600, 20 U.S.C. 1232d (b)(3)).

¹ The April 23, 2001 OSEP Monitoring Report incorporated the results of on-site visits during the weeks of December 6, 1999 and February 28, 2000 for the purpose of assessing compliance in implementation of IDEA Part B and assisting FDE in developing strategies to improve results for children and youth with disabilities.

2. FDE did not ensure that all Part B formal written complaints were resolved within 60 calendar days after a complaint was filed unless an extension of time was granted if exceptional circumstances existed with respect to a particular complaint (34 CFR §300.661).
3. FDE did not ensure that reports on the assessment of children with disabilities were made available to the public with the same frequency and in the same detail as reports on the assessment of nondisabled children (34 CFR §300.139(a)).
4. IEP teams did not always make an individualized determination about what, if any, accommodations to State or district-wide assessments were necessary for a child with a disability to participate in the assessment (34 CFR §300.347(a)(5)).

Free Appropriate Public Education (FAPE) in the Least Restrictive Environment

1. School districts did not ensure that all children who needed speech and language pathology as a related service to benefit from special education received that service (34 CFR §§300.24(a)(14) and 300.300).
2. School districts did not ensure that all children who needed psychological counseling services as a related service to benefit from special education received that service (34 CFR §§300.24(a)(9) and 300.300).
3. School districts did not ensure that all children with disabilities were removed from regular education classes only when the nature and severity of their disabilities was such that their education could not, even with the use of supplementary aides and services, be achieved satisfactorily in the regular education environment (34 CFR §300.550).

Secondary Transition

1. School districts did not always invite other agencies that were likely to be responsible for providing or paying for needed transition services to IEP meetings or take steps to ensure the participation of other agencies in the planning of transition services (34 CFR §300.344(b)(3)).
2. School districts did not always ensure that parents were properly notified that transition was a purpose of an IEP meeting and that the children and representatives of other agencies were invited to attend (34 CFR § 300.345(b)(2)-(3)).
3. Secondary transition plans for children with disabilities did not represent a coordinated set of activities within an outcome-oriented process that promoted movement from school to post-secondary activities (34 CFR §300.29).

OSEP's 2001 Report directed FDE to develop and implement corrective actions and improvement strategies to ensure the timely correction of the noncompliance identified in the Report. Subsequently, FDE submitted an Improvement Plan followed by Progress Reports and other supplementary information relevant to OSEP's Report findings. This information was submitted on May 7, 2002, August 20, 2002, May 9, 2003, September 20, 2003, January 22, 2004, and March 19, 2004. In these documents, FDE demonstrated that the State made progress in resolving all but three areas of noncompliance. On April 13, 2004, OSEP responded to FDE's January 22, 2004 Progress Report and requested that FDE submit additional documentation by June 13, 2004 on the three findings of

noncompliance that were not corrected. The State submitted a final Improvement Plan Progress Report and amendment (Amendment) on July 1, 2004. The Amendment detailed new strategies for improvement and evidence of change designed to lead to resolution of these issues. OSEP imposed Special Conditions on FDE's FFY 2004 grant award under Part B of IDEA in a letter dated July 1, 2004 because FDE had not yet demonstrated that it corrected the noncompliance in these areas. Two of the three remaining issues related to the provision of special education and related services that a child needs to benefit from special education, including speech and language pathology and psychological counseling in accordance with 34 CFR §§300.24(b)(9) and (14) and 300.300. The third area of noncompliance was FDE's responsibility to resolve complaints within the 60-day timeline unless an extension of time was granted if exceptional circumstances existed with respect to a particular complaint, in accordance with 34 CFR §300.661(a) and (b)(1). In accordance with the Special Conditions, FDE must document its progress in ensuring the correction of the noncompliance by submitting four quarterly reports to OSEP by October 15, 2004, January 15, 2005, April 15, 2005 and June 15, 2005 respectively.

In September 2003, OSEP conducted a verification visit to FDE as part of OSEP's four-part accountability strategy. Specifically, the purpose of the visit was to verify the effectiveness of the State's systems for general supervision, data collection under Section 618 of IDEA and State-wide assessment. A letter to the State, dated January 21, 2004, provided the results of the verification visit. FDE addressed one issue raised in the verification letter on June 13, 2004. The State's APR should reflect the collection, analysis, and reporting of relevant data, and document data-based determinations regarding performance and compliance in each of the cluster areas. This letter responds to the State's FFY 2002 APR as well as the June 13, 2004 letter and the Amendments of July 1, 2004.

General Supervision

In the January 2004 verification letter, OSEP addressed the 2001 Report finding regarding FDE's failure to ensure that formal written complaints received by FDE were resolved within 60 calendar days after they were filed, unless an extension of time was granted if exceptional circumstances existed with respect to a particular complaint. On pages one through 14 of the APR, FDE provided data and information on its complaint management system; however, this documentation did not demonstrate that FDE resolved complaints within the 60-day timeline or within extension timelines. FDE's July 2004 Amendment did, however, include new strategies related to timely resolution of complaints filed through the State complaint process. OSEP imposed special conditions on FDE's 2004 grant related to this issue. OSEP will review FDE's progress in the quarterly reports outlined in the Special Conditions and, in addition, OSEP will review FDE's progress as reported in the next APR.

During the verification visit, OSEP determined that while FDE's system for general supervision constituted a reasonable approach to the identification and correction of noncompliance under its new monitoring system, FDE was not able to show that its

methods addressed the unresolved Report findings related to the provision of psychological counseling services and speech and language services. Specifically, FDE's monitoring was not sufficient to demonstrate whether services were provided to all children who needed them as related services to benefit from special education. On pages 25 and 26 of the APR, FDE included data and analysis, targets, explanation of progress or slippage, activities, timelines and resources concerning the provision of speech and language services. However, this information reflected FDE's proposal for resolving this issue that OSEP rejected in its April 13, 2004 letter. The July 2004 Amendment contained updated information including new strategies that OSEP acknowledged as reasonable approaches to achieve compliance when it imposed special conditions related to this issue on FDE's 2004 grant on July 1, 2004. OSEP will review FDE's progress in the quarterly reports outlined in the Special Conditions and, in addition, OSEP will review FDE's progress as reported in the next APR. With respect to the finding related to the provision of psychological counseling as a related service, FDE addressed this requirement on pages 53-55 of the APR in the section concerning a free appropriate public education (FAPE) in the least restrictive environment (LRE) under the area of suspension and expulsion. OSEP will address this area in the FAPE in the LRE section of this letter.

OSEP's verification letter also indicated that FDE did not routinely track timelines for due process hearing decisions to ensure that these decisions were issued within 45 days from FDE's receipt of the hearing request, unless the hearing officer granted a specific extension of the timeline at the request of either party, consistent with 34 CFR §300.511(a) and (c). OSEP directed FDE to submit a plan by March 21, 2004 that described how FDE would monitor and enforce timelines for due process hearing decisions. FDE provided responsive information by letter of June 13, 2004. On pages one through 14 of the APR, FDE included data and analysis on due process hearings; however, it did not include information to show that FDE's monitoring system would be effective in ensuring that due process hearing timelines were met.

FDE's June 2004 documentation did not provide sufficient evidence to demonstrate that FDE ensured compliance with due process hearing timelines in accordance with 34 CFR §300.511(a) and (c). FDE's procedures included quarterly reports from the Division of Administrative Hearings (DOAH) in order to identify problems with timelines. This quarterly reporting strategy may result in cases being overdue a considerable time before FDE is even notified of a problem. Therefore, OSEP does not accept this strategy as effective in ensuring that the 45-day timeline for issuing due process hearing decisions is met.

34 CFR §300.511(a) and (c), permits a hearing officer to grant specific extensions of time beyond the 45-day timeline for issuing a final due process hearing decision at the request of either party. However, in the June 2004 procedures, FDE indicated that waivers of timelines could be granted. This practice is inconsistent with 34 CFR §300.511(a) and (c) which does not allow for waivers of due process hearing timelines. As previously stated, a hearing officer may only grant specific extensions of time at the request of either party. Within 60 days of the date of this letter, FDE must submit revised procedures, including

strategies that will lead to compliance with due process hearing timelines as well as appropriately granting specific extensions of time for due process hearing decisions. FDE must submit data and analyses demonstrating progress toward compliance in the next APR and a report to OSEP, with data and analyses demonstrating compliance, within 30 days following one year from the date OSEP accepts the procedures.

On pages 9-10 of the APR, FDE described its efforts to identify and remediate systemic issues through the analysis of findings from information and data collected from all available sources, including monitoring, complaint investigations, and due process hearing resolutions. In the analysis section, FDE indicated that its attempt to identify common issues within the monitoring results indicated the need for a systemic review of issues and definition of elements in order to identify trends. In the next APR, FDE should report on its progress to identify and remediate systemic issues identified through the analysis of data from its monitoring system across school districts.

On pages 14-23 of the APR, FDE provided extensive data and analysis to address State goals regarding a sufficient number of highly qualified staff to meet the needs of children with disabilities. OSEP looks forward to reviewing FDE's progress toward meeting its targets in the next APR.

On pages 23-24, FDE indicated that State procedures and practices would ensure the collection and reporting of accurate and timely data. In its analysis, FDE concluded that the State has a well-developed automated student database and assessment data. OSEP confirmed this conclusion during the verification visit. OSEP recognizes FDE's work in this area and looks forward to reviewing FDE's continued performance in the next APR.

Early Childhood Transition

On pages 27-30 of the APR, FDE included data and analysis related to the State goal that all children eligible for Part B services receive special education and related services by their third birthday. The APR identified targets, explanations of progress and slippage, activities, timelines and resources to reach the goal. On page 27 of the APR, FDE provided a table describing FDE's results in monitoring transition from Part C to Part B. The table showed one finding of noncompliance in one local educational agency (LEA) for each of three years from 2000-01, 2001-02 and 2002-03. In the analysis, FDE indicated these data were unreliable and included activities addressing the database systems to ensure that accurate data was available for future years. In the next APR, FDE should include a determination of compliance or noncompliance with the early childhood transition requirements. If the data show evidence of noncompliance, FDE must provide evidence of progress in correcting the noncompliance, including supporting data and its analysis, in the next APR and, in addition, provide a report to OSEP, with data and analysis demonstrating compliance, as soon as possible, but no later than 30 days following one year from the date of this letter.

Parent Involvement

Pages 31-37 included baseline and trend data with an analysis of the data regarding parent involvement. Pages 37-38 included targets, an explanation of progress, activities, timelines and resources to meet the State targets. In the next APR, OSEP suggests that, in addition to targets that focus on quantitative measures, FDE include qualitative measures, such as programmatic changes, that resulted from the parent involvement activities described on page 38. OSEP looks forward to reviewing this information in FDE's FFY 2003 APR.

On page 33 of the APR, FDE provided monitoring data that identified parental attendance at the IEP meetings. On Page 36 of the APR, FDE explained that in 2002-2003, 356 IEPs were submitted for desk reviews from the eight districts selected for monitoring. The review revealed that 52 percent of the IEPs had parent signatures on the IEP indicating attendance. For 48 percent, there were no parent signatures on the IEPs. The APR did not provide conclusions with regard to findings of noncompliance. This information indicates an area of potential noncompliance, not previously identified. Within 60 days of the date of this letter, FDE must provide OSEP with a determination of compliance or noncompliance with the IEP requirements for parental involvement. If the data indicate noncompliance, FDE must also submit a plan, including strategies, proposed evidence of change, targets and timelines designed to ensure correction of the noncompliance within a reasonable period of time, not to exceed one year from the date OSEP accepts the plan.

Free Appropriate Public Education in the Least Restrictive Environment

On pages 40 through 43 of the APR, FDE included data and analysis that identified FDE's efforts to ensure that the percentage of children with disabilities receiving special education by race/ethnicity, was not significantly disproportionate (by category of disability and educational environment) to the percentage of children, by race/ethnicity, in the State's general student enrollment.

On August 31, 2000, FDE and the Office for Civil Rights entered into a partnership agreement concerning the overrepresentation of Black students in the disability category of mental retardation (particularly educable mentally handicapped (EMH)) and a trend indicating that Black students received special education and related services in more restrictive settings than for other racial/ethnic groups. On page 42 of the APR, FDE identified the overrepresentation of Black students in the disability category of emotional disturbance as an additional area of concern. On pages 40 through 42 and in Attachment 2 of the APR, FDE included data and analysis, targets, explanation of progress and slippage, activities and resources to address this issue. According to the analysis on page 42 of the APR, the trend across years appeared unchanged. FDE's primary intervention for the last three years was to require districts with significant disproportionate representation in EMH to develop continuous improvement monitoring plans to address the districts' policies, procedures, and practices. FDE planned to require districts identified for continuous improvement monitoring in the area of disproportionate

representation to demonstrate and document that district policies and procedures and the practices are non-biased. In the next APR, FDE must report on the results of that review of district policies, procedures and practices.

On pages 43 through 48 of the APR, the State addressed graduation rates and drop-out rates for children with disabilities. Baseline data, targets, explanation of progress and slippage, activities, timelines and resources were included. FDE noted that the 2002-2003 target for the graduation rate was exceeded as evidenced by a higher rate of graduation among children with disabilities for the 2002-2003 school year than the 2001-2002 school year. Although FDE's 2002-2003 target for drop-out rate was not met, the drop-out rate did show improvement over time. On page 47 of the APR, FDE attributed several factors to increasing graduation rates and decreasing drop-out rates, including special funding and other resources to provide intensive interventions to children with disabilities who were having difficulties passing the Florida Comprehensive Assessment Test (FCAT). OSEP looks forward to reviewing data related to the implementation of FDE's strategies to improve graduation and drop-out rates for children with disabilities in the next APR.

On pages 48-55 of the APR, FDE included data and information on its efforts to ensure that suspension and expulsion rates for children with disabilities are comparable among local educational agencies within the State or to the rates for nondisabled children within the agencies. 34 CFR §300.146 requires that States examine data to determine if significant discrepancies are occurring in the rate of long-term suspensions and expulsions of children with disabilities either among LEAs in the State or compared to the rates for nondisabled children within the agencies. Where the State determines that significant discrepancies are occurring, it must review and, if appropriate, revise (or require the affected State agency or LEA to revise) its policies, procedures and practices relating to the development and implementation of individualized education programs (IEPs), the use of behavioral interventions, and procedural safeguards to ensure that the policies procedures and practices comply with Part B. The instructions to the 2002 APR directed States to describe which of these comparisons it did, as well as the method the State used to determine possible discrepancies, what constitutes a discrepancy, the number of agencies with significant discrepancies, and, if significant discrepancies were occurring, a description of those discrepancies and how the State planned to address them. The State's 2002 APR, however, did not include any information indicating that the State had examined data from the LEAs that it used in assembling the State level data to determine whether significant discrepancies were occurring in the LEAs based on either one of the comparisons described above. In the next APR, the State must include the information required by the instructions. If the 2003 APR does not include information indicating that the State has examined all data for all LEAs to determine whether significant discrepancies are occurring in the LEAs based on either one of comparisons described above, and that when it identifies significant discrepancies it reviews and, if appropriate, revises (or requires the affected State agency or LEA to revise) its policies, procedures and practices consistent with 34 CFR §300.146, then OSEP will conclude that the State is not complying with the regulation.

FDE also included a goal to ensure that all children with disabilities that needed psychological counseling services to benefit from special education received them. As described in the background section of this letter, OSEP's 2001 Report identified the provision of psychological counseling services as an area of noncompliance. The July 2004 Amendment included new strategies and evidence of change related to the provision of psychological services that OSEP accepted as reasonable approaches for correction. The APR addressed the provision of psychological services on pages 53 through 55, noting that an increase in psychological services occurred in 2003-2004 and attributing an increase in class attendance to the increase in provision of psychological services. OSEP will review FDE's progress as reported in the quarterly reports outlined in FDE's Special Conditions and, in addition, FDE must provide evidence of correction in the next APR.

On pages 55-60 and Attachment 3, FDE reported on the performance of children with disabilities on Florida's State-wide assessment system. According to FDE's analysis, the trend data, over the last three years, indicated improvement in the percent of children with disabilities scoring at proficient and above on the FCAT. The data demonstrated that the percentage of all children with proficient performance on the State reading and math assessment was also increasing. However, the rate at which children with disabilities were increasing their proficiency had not kept pace with the rate for all children. The APR included strategies so that the performance results for children with disabilities on State-wide assessments improve at a rate that decreases any gap between children with and without disabilities. OSEP looks forward to reviewing the implementation of FDE's strategies and their impact on narrowing the achievement gap between children with disabilities and all children in the next APR.

On pages 56-59 and attachment 3 of this section, the State included data indicating that the numbers of students who participated in State-wide assessment in reading and math were lower in all grades than the numbers of students with IEPs, according to Attachment 3, Section A. However, the State did not account for these discrepancies, as requested by the instructions for Attachment 3. OSEP could not determine from the APR, whether any students with disabilities did not participate in the State-wide assessment due to a failure by a public agency to meet the requirements of 34 CFR §300.347(a)(5) and §300.138. The State must include an analysis of compliance data related to those requirements as part of its FFY 2003 APR.²

OSEP's 2001 Report identified noncompliance in the removal of children with disabilities from the regular education environment, specifically school districts did not ensure that all children with disabilities were removed from regular education classes only when the nature and severity of the disability was such that their education could not, even with the use of supplementary aides and services, be achieved in the regular education environment. In Progress Reports that FDE submitted, FDE described various strategies to address lack of placement in the LRE. In its response to FDE's

² Please note that the regulations under the No Child Left Behind Act (NCLBA) provide, at 34 CFR §200.20(c), that, in order to make adequate yearly progress (AYP), a school or LEA must ensure that not less than 95 percent of its students with disabilities in the grades tested participate in the State assessments under 34 CFR §200.2.

Improvement Plan Progress Report dated April 13, 2004, OSEP determined that FDE demonstrated a mechanism in place to identify and correct this area of noncompliance. In the APR, FDE continued to report progress in this area. As noted on page 64 of the APR, FDE devoted a significant amount of resources to ensure that all children with disabilities were served in the LRE. FDE's regular class placement data was comparable with the national average and showed that the rate remained relatively stable over the past three years. OSEP looks forward to reviewing FDE's continued efforts to ensure that children with disabilities are educated with nondisabled peers to the maximum extent appropriate, including preschool, in the next APR.

On page 64 of the APR, FDE identified a numerical goal for increasing the percentage of children with disabilities served through the public school districts and the university laboratory schools, spending 80% or more of their school week with nondisabled peers, to 55%. In addition, the APR identified a numerical goal for increasing the percentage of children with disabilities, ages three through five, who received all of their special education and related services in educational programs designed primarily for children without disabilities or in their homes. While it is not inconsistent with Part B of the IDEA to include a numerical goal to increase the percentage of children with disabilities determined eligible for services, the State must continue to monitor to ensure that eligibility decisions for all children are made in conformity with the requirements of Part B of IDEA (34 CFR §§300.531 through 300.535) and not based upon a numerical goal.

On pages 67 through 68 of the APR, FDE discussed the goal of improving early language/communication, pre-reading, and social-emotional skills of preschool children with disabilities receiving special education and related services. FDE included data on the percentage of students entering kindergarten who had been served as preschool children with disabilities and an analysis of preschool outcomes for these children based on the School Readiness Uniform Screening System as well as targets, activities, timelines and resources. In the next APR, OSEP looks forward to reviewing the impact of FDE's strategies to achieve the desired target of increasing the percentage of preschool children with disabilities who are rated as 'ready' for kindergarten.

Secondary Transition

As described in the background section of this letter, OSEP's 2001 Report contained three findings related to secondary transition. As a result of its review of FDE's progress reports and discussions held during the verification visit, as noted in the April 13, 2004 letter OSEP determined that FDE appeared to have a mechanism in place to correct these problems and required FDE to continue to report in these areas in the APRs. (The FFY 2002 APR was submitted before this letter was issued.) On page 74 of the APR, FDE included maintenance strategies including plans to survey district transition contacts to gather data on the extent to which (a) agency representatives were invited to IEP meetings as well as the level of their participation; (b) parents were notified of the purpose of transition IEP meetings; and (c) children were invited to participate in their transition IEP meetings. FDE also included targets, timelines and resources directed toward the secondary transition goals stated above. OSEP looks forward to reviewing

FDE's continued efforts to maintain compliance with these requirements in the next APR.

On pages 69 through 75 of the APR, FDE reported on the progress of its goals for secondary transition. The first goal was designed to ensure that children with disabilities achieved positive post-school outcomes. The second goal was to ensure that children graduated and were prepared to enter the workforce and postsecondary education. FDE included data and an analysis that demonstrated progress toward meeting these goals. OSEP looks forward to reviewing the impact of FDE's strategies on children with disabilities, in the next APR.

Conclusions

FDE's July 2004 grant award letter establishes Special Conditions for three areas of noncompliance, including dates for reporting progress. To document its progress in ensuring the correction of the noncompliance, FDE must submit Progress Reports on October 15, 2004, January 15, 2005, April 15, 2005, and June 15, 2005 related to:

- Ensuring that psychological counseling, when required as a related service, is provided to all children who need this service to benefit from special education;
- Ensuring that speech and language services, when required as a related service, are provided to all children who need this service to benefit from special education; and
- Ensuring that formal written complaints filed through the State complaint process are resolved within the required timelines.

As noted above, FDE also must submit to OSEP within 60 days of the date of this letter:

- A revised plan that will achieve compliance with the due process hearing requirements regarding timelines and specific requests for exceptions. FDE must submit data and analyses demonstrating progress toward compliance in the next APR and a report to OSEP, with data and analyses demonstrating compliance, within 30 days following one year from the date OSEP accepts the plan;
- A determination of compliance or noncompliance with the IEP requirements for parental involvement. If the data show evidence of noncompliance, FDE must provide evidence of progress in correcting the noncompliance, including supporting data and its analysis, and, in addition, provide a report to OSEP, with data and analysis demonstrating compliance, as soon as possible, but no later than 30 days following one year from the date of this letter.

In the FFY 2003 APR, the State must include the following:

- A determination of compliance or noncompliance with the early childhood transition requirements. If the data show evidence of noncompliance, FDE must provide evidence of progress in correcting the noncompliance, including supporting data and its analysis, and, in addition, provide a report to OSEP,

with data and analysis demonstrating compliance, as soon as possible, but no later than 30 days following one year from the date of this letter;

- An analysis of FDE’s review of district policies, procedures and practices with regard to disproportionality data;
- Information indicating that the State has examined all data for all LEAs to determine whether significant discrepancies are occurring in the rate of long-term suspensions and expulsions of children with disabilities either among LEAs in the State or compared to the rates for nondisabled children within the agencies, and if it identifies significant discrepancies, the results of its review and, if appropriate, revision (or of the affected State agency’s or LEA’s review and revision) of policies, procedures and practices consistent with 34 CFR §300.146; and
- An analysis of compliance data related to the participation of children with disabilities in State-wide assessments.

In the FFY 2203 APR, the State should also report on its progress to identify and remediate systemic issues identified through the analysis of data from its monitoring system across school districts.

OSEP recognizes that the APR and its related activities represent only a portion of the work in your State. We appreciate your work on the APR and we look forward to collaborating with FDE as you continue to improve results for children with disabilities and their families. If you have questions, please contact Sheila Friedman at (202) 245-7349.

Sincerely,



Stephanie Smith Lee

Director

Office of Special Education Programs

cc: Bambi Lockman