



UNITED STATES DEPARTMENT OF EDUCATION

OFFICE OF SPECIAL EDUCATION AND REHABILITATIVE SERVICES

Honorable James W. Holsinger, Jr., M.D., Ph.D.

Secretary

Cabinet for Health Services

275 East Main Street

Frankfort, Kentucky 40621-0001

SEP -8 2005

Dear Secretary Holsinger:

The purpose of this letter is to respond to Kentucky's March 24, 2005 submission of its Federal Fiscal Year (FFY) 2003 Annual Performance Report (APR) for the Individuals with Disabilities Education Act (IDEA) Part C for the grant period July 1, 2003 through June 30, 2004. The APR reflects actual accomplishments that Kentucky made during the reporting period, compared to established objectives. The Office of Special Education Programs (OSEP) has designed the APR under the IDEA to provide uniform reporting from States and result in high-quality information across States. The APR is a significant data source for OSEP in the Continuous Improvement and Focused Monitoring System (CIFMS).

Kentucky's APR should reflect the collection, analysis, and reporting of relevant data, and include specific data-based determinations regarding performance and compliance in each of the cluster areas. This letter responds to Kentucky's FFY 2003 APR. OSEP has set out its comments, analysis and determinations by cluster area.

Background

The conclusion of OSEP's November 12, 2004 FFY 2002 APR response letter required the State to provide: (1) in the General Supervision cluster (34 CFR §303.501), an analysis of monitoring data, correction of flawed data reports, the results of strategies implemented to ensure sufficient personnel, and the impact of those strategies on timely evaluations and assessments; (2) in the Comprehensive Public Awareness and Child Find cluster (34 CFR §303.321), referral source data; (3) in the Early Intervention Services in Natural Environments cluster (34 CFR §303.344), data on the provision of services in natural environments and child-based justifications on IFSPs, the impact of personnel shortages on service provision, and functional outcomes data or a plan to collect the data; and (4) in the Early Childhood Transition cluster (34 CFR §§303.148(b)(1) and 303.148(b)(2)), an explanation of Part C to Part B exit data, and compliance data regarding the transition planning conference and LEA notification.

General Supervision

Identification and timely correction of noncompliance

On pages 3-4 of OSEP's November 12, 2004 letter, OSEP concluded that it could not determine whether the State's system of general supervision was effective in identifying and correcting

deficiencies identified through monitoring, as required by 34 CFR §303.501(b)(4), and whether monitoring findings identified systemic issues. In that same letter, on page 4, OSEP asked Kentucky to provide the following information in the FFY 2003 APR for each provider type it monitored (e.g., Point of Entry provider, evaluation, therapeutic, and primary service coordination provider): (1) the number of providers monitored; (2) the findings made, listed by provider; (3) whether corrective action plans were required, and if so, provide: (a) examples of two corrective action plans approved by the State, (b) the time period given providers to correct all noncompliance, and (c) the data or information each provider must submit to the State in order for the State to determine whether the noncompliance had been corrected; (4) for those noncompliant providers, whether each met the timeline for correcting noncompliance, and the number of providers that corrected all noncompliance within established timelines; (5) for noncompliance not corrected within the required timeline, whether any enforcement actions were taken (including the type of sanctions); (6) if persistent noncompliance existed, identify the barriers in correcting persistent noncompliance and how the State has addressed, or will address, those barriers; and (7) issues the State identified as systemic during the FFY 2002 reporting period and an analysis of strategies implemented to resolve those systemic issues.

On pages GS-1 and GS-2 of the FFY 2003 APR, Kentucky described its system of monitoring and program evaluation, and on page GS-2, Kentucky acknowledged that it did not provide the data requested in OSEP's November 12, 2004 letter, due in part to changes in staffing and administration of the program. In Attachment GS1-6, Kentucky reported monitoring data on 90 providers monitored during the APR reporting period, and indicated on page GS-2 of the FFY 2003 APR that Attachment GS1-6 is a sample of the type of data that the State intends to collect in the future. However, the monitoring citations reported in Attachment GS1-6 are reflective of the State's regulations and policies and procedures, not Federal Part C requirements. Similarly, in Attachment GS1-3, Kentucky provided information on its monitoring of four providers. In each case, Kentucky monitored the providers on compliance with Kentucky regulations and policies and procedures, not Federal Part C regulations. Accordingly, OSEP is unable to determine from this information whether Kentucky is ensuring compliance with the Federal Part C requirements.

In addition, on page GS-3 of the FFY 2003 APR, Kentucky acknowledged that it needed to improve collecting and tracking monitoring data, showing the direct relationship between the monitoring data and specific identified noncompliance, and addressing this noncompliance with training, technical assistance or language changes in its policy. On pages GS-3 and GS-4 of the FFY 2003 APR, Kentucky included strategies, targets, and timelines to improve performance.

Kentucky must revise its monitoring instruments to ensure that its monitoring process identifies Part C compliance requirements. Using revised monitoring data from the 90 providers monitored during the APR reporting period, Kentucky must include in the State Performance Plan (SPP) due December 2, 2005: (1) disaggregated monitoring data by provider type on Part C requirements monitored during the reporting period; (2) a list of findings regarding noncompliance with Part C requirements, (3) any corrective actions taken to correct noncompliance; and (4) documentation that noncompliance was corrected as soon as possible but in no case later than one year from identification.

Service Guidelines

In the Introduction and in the Attachment to the Introduction of its FFY 2003 APR, Kentucky described a detailed process it used to streamline the operations of its early intervention program. That process included the promulgation of a Kentucky Administrative Rule (KAR) regarding the coverage and payment for Kentucky early intervention services. Section 3(4) of 911 KAR 2:200 provides limitations on the amount and type of early intervention services allowable, unless preauthorized by the Department for Public Health (through a Record Review Team). Kentucky's regulations at 911 KAR 2:200 Section 4, 4(b) provide that even if the Record Review Team recommends that an early intervention service not be included on an IFSP, the IFSP team may conclude that the service is still needed, and payment for the service shall be authorized for the duration of the current IFSP. Pursuant to Kentucky's regulations and the procedures discussed above, in order for the IFSP team to identify needed early intervention services on the IFSP that exceed the amounts preauthorized by the Department for Public Health, Kentucky indicated on page NE-4 of the FFY 2003 APR that the IFSP team may request specific programmatic recommendations from the Record Review Team and that the IFSP team has the choice to follow the recommendations or not.

OSEP's June 9, 2005 Memorandum regarding the above-mentioned Kentucky regulation required the State, pursuant to 34 CFR §§303.343 and 303.344, to amend its Addendum to First Steps Policy & Procedure Manual to ensure that the IFSP team is the ultimate decision-making authority for determining early intervention services (including the frequency and location of services) needed by a child and identified on the child's IFSP. On June 10, 2005, Kentucky submitted to OSEP (and on June 14, 2005 OSEP approved) Kentucky's revised language to make clear in the Addendum to First Steps Policy & Procedure Manual that the IFSP team is the ultimate decision-making authority, consistent with 34 CFR §§303.343 and 303.344.

OSEP has previously expressed concerns that Kentucky's new procedures regarding the use of the Record Review Team may result in IFSP teams not identifying all needed early intervention services on the IFSP. Kentucky is required to monitor compliance with Part C requirements under 34 CFR §303.501, including the requirement under 34 CFR §303.344, that needed early intervention services are identified on the IFSP. In the SPP, Kentucky must provide data, for the time period July 1, 2004 through June 30, 2005 on: (1) the number of service requests submitted by IFSP teams to the Record Review Team pursuant to 911 KAR 2:200, Section 3(4) for a recommendation regarding early intervention service units that exceeded the preauthorized amounts; (2) of the number of service requests in number one above, provide the number of approved recommendations from the Record Review Team and the number of disapproved recommendations from the Record Review Team; (3) of the number of service requests in number two above that were disapproved by the Record Review Team, the number that the IFSP team determined should nevertheless be implemented, based on an IFSP team decision as well as the number that were disapproved and were not identified on the child's IFSP by the IFSP team; and (4) for those that were disapproved and not identified on the child's IFSP, an explanation for why the service was not identified. For the purposes of gathering this data, a request for each early intervention service that the IFSP team proposes to exceed the preauthorized amount should be counted, even if more than one type of service is requested for a particular child. For example, if an IFSP team submits a request to exceed the preauthorized amounts for both speech and physical therapy for one child, that request should be counted as two requests.

Dispute resolution

On pages GS-5, GS-7 through GS-9, and Part C Attachment 1 (Attachment GS2-1) of the FFY 2003 APR, Kentucky included data and information regarding complaints, mediation, and due process hearings. Kentucky reported that 24 of 25 complaints were resolved within timelines but did not provide an explanation for the one complaint that was not timely resolved. In the SPP, the State must provide an explanation of the complaint reported in the FFY 2003 APR that was not timely resolved, in addition to responding to SPP indicators #10-13.

Personnel

On page 4 of OSEP's November 12, 2004 letter, OSEP found that the State – on pages 7-8 in the FFY 2002 APR – reported slippage in the area of sufficient personnel. OSEP also found that a focused provider recruitment strategy resulted in limiting new provider contracts in under-served areas of the State and decreased provider availability. Accordingly, on page 4 of its November 12, 2004 letter, OSEP asked Kentucky to provide in its FFY 2003 APR, information that included both implementation of strategies and the resulting data demonstrating improvement in the area of personnel development, sufficient personnel, and data indicating whether timely evaluations and assessments and provision of Part C services are negatively affected by any personnel unavailability.

Kentucky provided conflicting information regarding the area of sufficient personnel. On pages GS-10 and FC-2 of the FFY 2003 APR, Kentucky reported information indicating adequate providers in both urban and rural areas to meet the needs for identified services on the IFSP. However, in Attachment GS4-1, Kentucky reported data and analysis indicating a need to improve performance in this area, particularly in rural regions that continued to identify service gaps. Despite the conflicting information, Kentucky identified barriers to recruitment and included some strategies to improve performance.

Collection and timely reporting of accurate data

On page 5 of OSEP's November 12, 2004 letter, OSEP acknowledged that the State had found flaws in two data reports: (1) the 45-day timeline report was flawed due to: (a) overstating the number of days from the referral to IFSP, which was caused by incorrect reporting of referral information by service coordinators; (b) over-reporting the number of referrals; and (c) failing to capture reasons for not meeting the 45-day timeline requirement; and (2) the IFSP report that captured the percentage of services delivered was flawed due to: (a) the possibility that the Central Billing and Information System (CBIS) might not delete subsequent changes in approval of prior services; and (b) CBIS continuing to compare delivered services to services that were no longer authorized. In the November 12, 2004 letter, OSEP asked Kentucky to provide in the FFY 2003 APR strategies, evidence of change, targets, and timelines for correction of the flawed data reports within a reasonable period of time and, in the interim, how the State would determine compliance with the Part C 45-day timeline early intervention service provision requirements. Kentucky did not provide the information requested by OSEP regarding the 45-day timeline report; rather, it stated on page GS-13 of the FFY 2003 APR that the issue with the flawed data report had been the need for staff and the change in Administration. Regarding the IFSP report that captured the

percentage of services delivered, Kentucky submitted Attachment GS5-1, which indicated the cost per child and the total paid for eligible services during fiscal years 2003 and 2004. However, the report does not provide any data on the percentage of services listed on IFSPs that were actually delivered. In addition, on page GS-14 of the FFY 2003 APR, Kentucky provided a target, future activities, and timelines to design and institute a monitoring data collection and tracking system, but did not propose any strategies, evidence of change, and timelines that addressed the identified flaws in the CBIS data reports.

In the SPP, Kentucky must indicate how it will correct the flaws in the CBIS data reports, and submit a description of its monitoring and data collection tracking system, including a discussion of how the new system tracks compliance with Part C requirements.

Comprehensive Public Awareness and Child Find System

As noted on page CF-1 of Kentucky's FFY 2003 APR, child count data reported by Kentucky under Part C, Section 618 of IDEA indicated that the State's child count was 2.37% of its population.

On page 5 of OSEP's November 12, 2004 letter, OSEP asked Kentucky to provide data on the number and source of referrals received in rural areas, including the number of referrals from neo-natal follow-up programs. On page CF-4 of its FFY 2003 APR, Kentucky reported that it did not begin collecting information regarding the number and source of referrals in rural areas until March 2004. Accordingly, the State only provided data from March 2004 through June 2004. In addition, on page CF-4 of its FFY 2003 APR, Kentucky reported that the total number of neo-natal referrals for FFY 2003 was 61, but indicated that it was unable to determine what percentage of these referrals were from urban or rural areas. On page CF-5 of its FFY 2003 APR, Kentucky provided targets, timelines, and activities designed to improve the identification of children under the age of one with developmental delays. OSEP appreciates Kentucky's efforts in this area and looks forward to reviewing data and information in the SPP.

Family Centered Services

On pages FC-1 through FC-3 of the FFY 2003 APR, Kentucky included data and analysis regarding performance in this area. On page FC-2, Kentucky reported survey data that indicated: (1) 100% of families reported that their services were related to their concerns and that the IFSP was based on their priorities; (2) 90% of rural families surveyed felt that they were part of the IFSP team; and (3) 100% of rural families surveyed were satisfied with the First Steps program (Kentucky's early intervention program). In the SPP, OSEP looks forward to reviewing Kentucky's data regarding the percent of families participating in Part C who reported that early intervention services helped them: (a) know their rights; (b) effectively communicate their children's needs; and (c) help their children develop and learn.

Early Intervention Services (EIS) in Natural Environments (NE)

Service coordination

On pages NE-1 through NE-2 of the FFY 2003 APR, Kentucky included data and analysis regarding compliance and performance in this area. OSEP appreciates the State's efforts in this area.

Evaluation and identification of needs

On page GS-13 of the FFY 2003 APR, Kentucky reported that it uses the CBIS Data Collection Report (Attachment GS5-1 of the FFY 2003 APR) to collect data at both the district and State levels, and stated that this report collects all information on children, families and providers. The CBIS Data Collection Report indicated that the average number of days from referral to IFSP in FFY 2003 was 57 and in FFY 2004 was 58. The State did not provide an explanation for the data or a reason why the timelines exceeded 45 days. As mentioned in the General Supervision section of this letter regarding data collection, OSEP asked Kentucky to provide in the FFY 2003 APR, strategies, evidence of change, targets, and timelines for correction of the flawed data report regarding the 45-day timeline requirement within a reasonable period of time and, in the interim, to explain how the State would determine compliance with the Part C 45-day timeline requirement at 34 CFR §303.321(e). However, Kentucky did not provide an explanation of how it would determine compliance with the 45-day timeline in the interim, nor did it provide strategies, evidence of change, or timelines to address the identified flaws in the CBIS data reports.

In the SPP, Kentucky must include data on compliance with the 45 day timeline requirements in 34 CFR §303.321(e). Data may include monitoring data from the FFY 2003 reporting period on the number of children found eligible and, from that number, the percent of eligible infants and toddlers with IFSPs for whom an evaluation and assessment and an initial IFSP meeting were conducted within the 45-day timeline requirement. If the data show noncompliance, Kentucky must submit a plan, with strategies, proposed evidence of change, targets and timelines, designed to achieve compliance as soon as possible but no later than one year from the date OSEP accepts the plan.

On page GS-10 of the FFY 2003 APR, Kentucky included information indicating a need to improve performance in the area of ensuring appropriate staffing levels at the intake or point of entry level in order to meet the 45-day timeline requirement. Kentucky did not include strategies to improve performance in this area. In the SPP, Kentucky should include strategies and timelines to improve performance along with a determination of the impact of staffing levels on the 45-day timeline. OSEP looks forward to reviewing these strategies in the SPP.

Individualized family service plans (IFSPs)

On page 6 of OSEP's November 12, 2004 letter, OSEP indicated that Kentucky must report compliance data demonstrating . . . whether children received the services listed on their IFSP and the impact, if any, of personnel shortages on the provision of early intervention services. Kentucky provided some data in this area. For example, pages FC-1 through FC-2 of the FFY 2003 APR included some data and information regarding children receiving services listed on their IFSP. Chart FC-1 described the approximate percentage of children receiving specific therapeutic services, with 100% of children receiving some type of service in both urban and rural areas. Chart FC-8, a parent survey, indicates that about 75% of providers kept their scheduled visits. However, Kentucky did not provide data on whether children received the services listed on their IFSP. Accordingly, OSEP is unable to determine from this information whether Kentucky is ensuring compliance with the Federal Part C requirements at 34 CFR §§303.340(c) and 303.342(e).

In the SPP, Kentucky must provide data indicating the percent of infants and toddlers with IFSPs who receive early intervention services on their IFSPs in a timely manner. Kentucky may obtain this data through monitoring on the percentage of services listed on the IFSP that are actually delivered. If the data indicate noncompliance, Kentucky must submit a plan, with strategies, proposed evidence of change, targets and timelines, designed to achieve compliance as soon as possible but no later than one year from the date OSEP accepts the plan.

Natural environments

In the November 12, 2004 APR response letter, OSEP requested that Kentucky provide data in the FFY 2003 APR on the provision of services in natural environments, child-based justifications on IFSPs, and the impact of personnel shortages on service provision. On page NE-10 of the FFY 2003 APR, Kentucky reported that almost 94% of children receive services in either the home or childcare center, despite a reported slippage in the area of sufficient personnel. On page NE-11, Kentucky reported that follow-up monitoring data indicated 1 of 16 providers were re-cited for not including a justification on the IFSP when services were not provided in natural environments. OSEP appreciates Kentucky's efforts in this area and looks forward to reviewing data and information in the SPP demonstrating continued improvement in the percent of infants and toddlers with IFSPs who receive early intervention services in the home or community settings.

Early childhood outcomes

Under the Government Performance and Results Act of 1993, 31 U.S.C. §1116, the effectiveness of the IDEA Part C program is measured based on the extent to which children receiving Part C services demonstrate improved and sustained functional abilities in the cognitive, physical, communication, social or emotional, and adaptive developmental areas. The Part C FFY 2001, 2002 and 2003 APRs requested data on the percentage of children participating in the Part C program that demonstrated improved and sustained functional abilities in the developmental areas listed in 34 CFR §303.322(c)(3)(ii). On page 6 of OSEP's November 12, 2004 letter, OSEP found that the State reported having no baseline data in this area, and OSEP instructed Kentucky to either submit data (whether collected through sampling, monitoring, IFSP review, or other methods), targets for improved performance and strategies to achieve those targets for this area, or its plan to collect and report to OSEP data by the FFY 2004 APR . . . including a detailed timeline of the activities necessary to implement the plan.

On page NE-13 of the FFY 2003 APR, Kentucky reported on activities implemented during the reporting period to collect performance data; however, the State was unable to draw conclusions from the limited data collected. Kentucky stated on page NE-13 of the FFY 2003 APR that: (1) regulations have gone into effect that will require progress scores on every outcome at each IFSP; (2) by January 2005, all six-month progress reports will include assessment progress data; and (3) all IFSPs will include a progress scale for child outcomes that will be determined by the family and recorded in the Central Data system, so Kentucky will have data for the next reporting period. In preparing the SPP, the State must determine whether data collected related to this area will be responsive to those requirements. OSEP looks forward to reviewing updated early childhood outcome data in the State's SPP.

Early Childhood Transition

In its November 12, 2004 letter, OSEP expressed concern about potential noncompliance and, on page 7 of that letter, asked Kentucky to provide in its FFY 2003 APR, an analysis of monitoring or other data to explain why the majority of children exiting Part C do so with eligibility not determined, strategies to resolve any identified discrepancies; and provide updated monitoring data on compliance with the Part C transition conference at 34 CFR §303.148(b)(2)(i) and LEA notification requirements at 34 CFR §303.148(b)(1).

On pages T-1 and T-2 of the FFY 2003 APR, Kentucky included data and information regarding early childhood transition. On page T-2 and Attachment T-2 of its FFY 2003 APR, Kentucky provided updated monitoring data on compliance with the Part C transition conference. Kentucky reported that it found 18 out of 90 providers (20%) in noncompliance with transition conference requirements. However, all providers cited with noncompliance regarding the transition conference corrected the noncompliance within one year of identification.

On page T-2 of its FFY 2003 APR, Kentucky reported that its system for notifying local educational agencies has not proven effective. Kentucky sought and was awarded a General Supervision Enhancement Grant (GSEG) that will, among other things, address the development of a coordinated data management system that supports the transition process, including tracking and informing Part B of children in Part C that might meet Part B eligibility.

The State did not include data in the FFY 2003 APR to address establishing a transition plan under 34 CFR §§303.148(b)(4) and 303.344(h). The State must include, in the SPP, data and analysis reflecting compliance with the requirements regarding LEA notification, transition planning, and transition conference. If the State's data indicate noncompliance, the State must submit, in the SPP, a plan that includes strategies, proposed evidence of change, targets and timelines to achieve full compliance as soon as possible, not to exceed one year from when OSEP accepts the plan.

Conclusion

As noted above, in Kentucky's SPP, due December 2, 2005, Kentucky must submit the following information to OSEP:

1. General Supervision
 - a. Using revised monitoring data from the 90 providers monitored during the FFY 2003 APR reporting period: (1) disaggregated monitoring data by provider type on Part C requirements monitored during the reporting period; (2) a list of findings regarding noncompliance with Part C requirements; (3) any corrective actions taken to correct noncompliance; and (4) documentation that noncompliance was corrected as soon as possible but in no case later than one year from identification;
 - b. Data for the time period July 1, 2004 through June 30, 2005 on the following: (1) the number of service requests submitted by IFSP teams to the Record Review Team pursuant to 911 KAR 2:200, Section 3(4) for a recommendation regarding early intervention service units that exceeded the preauthorized amounts; (2) of the number of service requests in number one above, provide the number of approved recommendations from the Record

Review Team and the number of disapproved recommendations from the Record Review Team; (3) of the number of service requests in number two above that were disapproved by the Record Review Team, the number that the IFSP team determined should nevertheless be implemented, based on an IFSP team decision as well as the number that were disapproved and were not identified on the child's IFSP by the IFSP team; and (4) for those that were disapproved and not identified on the child's IFSP, an explanation for why the service was not identified. For the purposes of gathering this data, a request for each early intervention service that the IFSP team proposes to exceed the preauthorized amount should be counted, even if more than one type of service is requested for a particular child. For example, if an IFSP team submits a request to exceed the preauthorized amounts for both speech and physical therapy for one child, that request should be counted as two requests;

- c. An explanation of the complaint reported in the FFY 2003 APR that was not timely resolved, in addition to responding to SPP indicators #10-13;
- d. Kentucky must indicate how it will correct the flaws in the CBIS data reports, and submit a description of its monitoring and data collection tracking system, including a discussion of how the new system tracks compliance with Part C requirements;

2. Early Intervention Services in Natural Environments

- a. Data on compliance with the 45-day timeline requirements in 34 CFR §303.321(e). Data may include monitoring data from the FFY 2003 reporting period on the number of children found eligible and, from that number, the percent of eligible infants and toddlers with IFSPs for whom an evaluation and assessment and an initial IFSP meeting were conducted within the 45-day timeline requirement. If the data show noncompliance, Kentucky must submit a plan, with strategies, proposed evidence of change, targets and timelines, designed to achieve compliance as soon as possible but no later than one year from the date OSEP accepts the plan;
- b. With respect to ensuring appropriate staffing levels at the intake or point of entry level in order to meet the 45-day timeline requirement, strategies and timelines to improve performance, along with a determination of the impact of staffing levels on the 45-day timeline;
- c. Data indicating the percent of infants and toddlers with IFSPs who receive early intervention services on their IFSPs in a timely manner. Kentucky may obtain this data through monitoring on the percentage of services listed on the IFSP that are actually delivered. If the data indicate noncompliance, Kentucky must submit a plan, with strategies, proposed evidence of change, targets and timelines, designed to achieve compliance as soon as possible but no later than one year from the date OSEP accepts the plan;
- d. Incorporate and update the data and information collected for, and reported in, the State's FFY 2001, 2002 and 2003 APRs to address the requirements related to sustained and improved functional abilities. In preparing the SPP, the State must determine whether data collected related to this area will be responsive to those requirements;

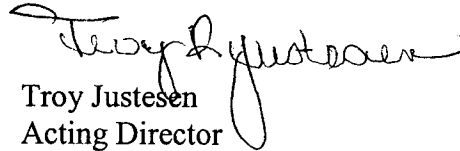
3. Early Childhood Transition

- a. Data and analysis reflecting compliance with the transition requirements regarding LEA notification, transition planning, and transition conference. If the State's data indicate noncompliance, the State must submit, in the SPP, a plan that includes strategies, proposed evidence of change, targets and timelines to achieve full compliance as soon as possible, not to exceed one year from when OSEP accepts the plan.

IDEA 2004, §616, requires each State to submit a SPP that measures performance on monitoring priorities and indicators established by the Department. These priorities and indicators are, for the most part, similar to the clusters and probes in the APR. OSEP encourages the State to carefully consider the comments in this letter as it prepares its SPP, due December 2, 2005.

OSEP recognizes that the APR and its related activities represent only a portion of the work in your State and looks forward to collaborating with you as you continue to improve results for infants and toddlers with disabilities and their families. If you have questions, please contact Mary A. Williams at (202) 245-7586.

Sincerely,



Troy Justesen
Acting Director
Office of Special Education Programs

cc: Anne Swinford