

COMPLAINT INVESTIGATION REPORT

Complaint Number: 20.21.03
Complaint Investigator: [Redacted]
Date Complaint Filed: September 1, 2020
Date of Report: [Redacted]

Introduction

The Student at issue in this complaint was a transfer student from an out of state residential placement. Student was placed in the Integrated Learning Program (ILP) in the District over the objection of the Foster Parent, Guardian ad Litem and NDHSS Caseworker. Student was not admitted to the District program until one month after arrival in the District and has not been evaluated yet.

Issues Investigated

1. Did the District fail to develop and implement an appropriate IEP that provided a Free Appropriate Public Education (FAPE) to student for the 2019-2020 school year and the 2020-2021 school year in violation of 92 NAC 51-004.02; 006.03A; 007.02B and 007.10
 - a. By failing to register Student to provide educational services in a timely manner;
 - b. By failing to determine appropriate placement for the Student;
 - c. By failing to provide appropriate educational programming to meet Student's academic needs; and
 - d. By failing to provide appropriate therapeutic services and educational supports?
2. Did the District fail to evaluate Student in all areas of suspected disability in violation of 92 NAC 51-006.02B;
3. Did the District fail to provide comparable service to the Student who transferred from another state in violation of 92 NAC 51-007.08B?

Documents Reviewed by Investigator

From the Complainant

- Student' IEP dated December 13, 2017; received by NDE on September 8, 2020
- Complainant letter dated September 1, 2020; received by NDE on September 8, 2020

- Complaint dated September 1, 2020; received by NDE on September 8, 2020

From the School District

- District response dated September 25, 2020; received by NDE on September 29, 2020
- MDT Report dated December 13, 2017
- Student IEP dated December 13, 2017
- Student Enrollment – Secondary Family Census signed November 4, 2019
- Prior Written Notice for Initial Provision of Special Education Services dated November 20, 2019
- Health Services Permission for Medication signed November 25, 2019
- Notice of IEP Meeting dated January 10, 2020
- IEP dated January 22, 2020
- Speech Therapy Evaluation – Plan of Care dated April 1, 2020
- Notice of IEP Meeting dated April 16, 2020
- Special Education Contact Log dated September 3, 2019-September 24, 2020; March 23, 2020 – May 11, 2020
- Service Logs including administration of medication and therapeutic services provided dated December 13, 2019 – February 28, 2020
- Attendance Records for the Student during the 2019-20 and 2020-21 School Year
- Student Schedule for the 2019-20 and 2020-21 School Year
- Student report card, 2019-20
- Student progress report dated March 5, 2020
- Student progress report dated May 20, 2020
- Behavior Detail Report, Out of class logs, Student transportation conduct report for the 2019-20 School Year

Issue #1

Did the District fail to develop and implement an appropriate IEP that provided a Free Appropriate Public Education (FAPE) to student for the 2019-2020 school year and the 2020-2021 school year in violation of 92 NAC 51-004.02; 006.03A; and 007.10

- a. By failing to register Student to provide educational services in a timely manner;
- b. By failing to determine appropriate placement for the Student;
- c. By failing to provide appropriate educational programming to meet Student's academic needs; and

- d. By failing to provide appropriate therapeutic services and educational supports?

92 NAC 51-004.02 states:

004.02 *The school district or approved cooperative shall ensure that FAPE is available to any individual child with a disability who needs special education and related services, even though the child has not failed or been retained in a course or grade and is advancing from grade to grade*

92 NAC 51- 006.03A states:

006.03A *The multidisciplinary evaluation team (including the child's parents) shall be responsible for the analysis, assessment, and documentation of educational and developmental abilities and needs of each child referred for the purpose of individual evaluation. Using the documentation collected and the verification criteria found in Section 006 of this Chapter and the definitions found in 92 NAC 51-006.04, the MDT shall make all verification decisions. Documented information shall be collected to facilitate the development of a statement of present level of development and educational performance on the IEP*

92 NAC 51-007.02B states:

007.02B *Each school district or approved cooperative shall ensure that an IEP is in effect before special education and related services are provided to a child with a verified disability under this Chapter.*

92 NAC 51-007.10 states:

007.10 *The IEP team shall revise the IEP as appropriate to address:*

007.01A *Any lack of expected progress toward the annual goals described in 92 NAC 51-007.07 and in the general education curriculum, if appropriate;*

007.10B *The results of any reevaluation conducted under 92 NAC 51-006.05A;*

007.10C *The information about the child provided to, or by, the parents, as described in 92 NAC 51-006.06A1;*

007.10D *The child's anticipated needs;*

007.10E *Other matters.*

The Complainant's Position

The Student had attended a residential treatment program prior to enrollment at the District. Repeatedly, prior to November 26, 2019, the Student's first day in district, the Educational Surrogate, Foster Parent and NDHHS Caseworker informed the District that the Student would be enrolling in the District sometime in October 2019. The District, on at least three occasions prior to the Student's enrollment, was provided with copies of the Student's educational records including the most recent IEP. The Educational Surrogate, NDHHS Caseworker and Foster Parent requested on multiple occasions that an out of district placement be considered for the Student because of needs. The NDHHS Caseworker for the Student completed the registration packet on October 18, 2019. The Student arrived in the District on October 25, 2019 but was not assigned to an educational program within the district until November 14, 2019. The NDHHS Caseworker submitted another copy of the registration packet on November 4, 2019. The District did not make a referral to the out of district program. (Letter of Complaint dated September 1, 2020)

On November 14, 2019, the District informed the Educational Surrogate that the Student would be enrolled in a District Behavior Program, a District mainstream program; the Educational Surrogate objected to the placement and was informed that a meeting would be held prior to implementation of that placement. On November 21, 2019, District personnel indicated that the Student was enrolled in the District Behavior Program and any change in that placement would require a meeting. The Student was accepted in the District Behavior Program on November 25, 2019, one month after arriving in the District. At a meeting that day with District Behavior Program personnel, the District informed the Foster Parent, Educational Surrogate and Guardian ad Litem that no changes in placement would occur until after a forty-five-day evaluation period was completed. The Student was not allowed to attend the District's Behavior Program until November 26, 2019. (Letter of Complaint dated September 1, 2020)

The first two days the Student attended the District Behavior Program, the Student was out of the classroom most of the day. The first day was for self-harming comments; the second day was frustration over math. This information was not shared with Student's Foster Parent, Educational Surrogate or Guardian ad Litem until December 3, 2019, when the Student made comments about self-harming behavior. On December 4, 2019, the Educational Surrogate contacted

the District about a log of self-harming behaviors and medication administration. She was informed that medication would no longer be an issue. On December 17, 2019, the medication log indicated that the Student had received medication when school was not in session. Although the Educational Surrogate placed a call to the District; no response was forthcoming. (Letter of Complaint dated September 1, 2020)

An IEP meeting was held on January 21, 2020. The Student's therapeutic supports were reduced to, as needed. District staff reported Student was doing well in District Behavior Program because the Student was not eloping, yet the Student was out of the classroom due to behavior issues the majority of the day (see table regarding behavior in Issue #2). (Letter of Complaint dated September 1, 2020)

School was closed in March 2020 because of COVID-19. An IEP to address virtual learning was held on April 17, 2020. The District was provided with a speech/language evaluation that indicated the Student's need for speech services and the Student would begin private speech shortly thereafter. The District commented that since the Student was receiving private speech services, the Student did not need speech services through the District. The District began the 2020-2021 school year virtually on August 18, 2020. The District was informed that virtual learning was difficult for the Student given the Student's disabilities and needs. On August 31, 2020, the NDHHS Caseworker and Educational Surrogate went to speak to the special education director about meeting the Student's needs. They again requested a referral to an out of district placement to meet the Student's needs. (Letter of Complaint dated September 1, 2020)

The District's Position

The most recent multi-disciplinary team (MDT) report was completed on December 13, 2017. The most recent IEP was from that same date. The District was contacted by the Nebraska Department of Health and Human Services (NDHHS) about enrolling Student on October 26, 2019. Prior to this, the District logs indicate that the District was informed by telephone calls and emails that Student would be attending the District. The Student was enrolled in the District on November 4, 2019. The District had never received the IEP from the previous residential placement. The last IEP was dated December 13, 2017. The Student first attended the District on November 25, 2019. The December 13, 2017 IEP was implemented until an IEP meeting could be scheduled. The IEP meeting was held on January 21, 2020. A notice of meeting was sent prior to the meeting and a prior written notice (PWN) was provided following the meeting. A notice of IEP meeting was sent on April 16, 2020 for an IEP meeting on April 17, 2020

concerning provision of distance learning because of school closure due to COVID. A PWN was sent that day. There were repeated contacts between the District and DHHS in October 2019 before the Student was enrolled in the District. DHHS and parent attempted to enroll the Student in an out of district placement prior to enrollment in the District. The out of district placement requested by DHHS and the Parent was an independent facility and while the District could recommend placement; there was no guarantee that the Student would be placed there. (Letter of Response dated September 25, 2020)

The Student has not been suspended since being enrolled in the District, nor has the Student been released early on any occasion. The Student was placed in the District Behavior Program where the Student has been successful. The Student received intervention time and/or physical intervention on two occasions and was involved in a physical altercation on the bus which resulted in a one-day bus suspension. The Student was removed from the classroom and/or bus on twenty-three occasions because of misbehavior; these removals were to the hall or intervention room. Instruction time was missed for at least ten minutes and up to sixty-one minutes. The Student's grades for second and third quarter were Ds. Grades for the year were Ds and Fs except for physical education (B) and Affect (A). The Student's math grade was a D and reading grade was an F. Progress reports in March indicated that the Student made progress on goals. On the first two behavioral goals, the Student exhibited safe behavior 96% of the time and respectful behavior 90% of the time. The Student met the goal for responsible behavior. It was also reported that the Student was making progress on math and reading goals. No progress reports were completed for May because of virtual learning.

Investigative Findings

On August 1, 2019, the Educational Surrogate notified the Director of Special Education by phone that the Student would be returning to Nebraska and would be enrolling in the District (Letter of Complaint dated September 1, 2020). The Educational Surrogate emailed the Student's IEP, past report cards and progress notes the same day. On October 11, 2019 the Nebraska Department of Health and Human Services (NDHHS) Caseworker was given a packet of enrollment paperwork to complete. The enrollment paperwork was completed and returned to the Administration Building on October 18, 2019 along with the documents of the Student's educational history by the NDHHS Caseworker. The NDHHS Caseworker returned to the Administration Building on October 25, 2019 to follow up on the Student's enrollment. The Student arrived in Nebraska to the new foster home on October 26, 2019. (Letter of Complaint dated September 1, 2020)

The Special Education Contact Log indicates that on October 25, 2019, that the District shared enrollment information with both the NDHHS Caseworker and the Educational Surrogate. The Letter of Response states that the NDHHS Caseworker, Educational Surrogate, Foster Parent, and Guardian ad Litem had contacted the District Special Education Office frequently during October of 2019. However, no other entries are made in the contact log until November 1, 2019 in which the District contacted the NDHHS Caseworker explaining that someone needed to come to enroll the Student. The NDHHS Caseworker was also told at that time that the District needed the Student's birth certificate and immunization records. It was also relayed that the Special Education Department was aware about the Student and would determine placement once the Student was enrolled.

The Student Enrollment paperwork obtained by the District was signed and dated November 4, 2019. On November 22, 2019, the District called the Educational Surrogate to set up the intake for the Student. The intake meeting was scheduled for November 25, 2019. (Special Education Contact Log dated November 22, 2019)

At enrollment, The District received an IEP dated December 13, 2017, and a Treatment Plan Review from the Residential Facility the Student attended for 2 years. The District was unable to obtain an IEP or MDT from the Residential Facility. Due to not having a valid IEP from the Residential Facility, the District chose to implement the IEP dated December 13, 2017 until it could conduct its own IEP (Letter of Response dated September 25, 2020).

The Student was removed from the classroom because of behavior a total of 310 minutes (see behavior table included in Issue #2). The Student was being removed from the classroom almost daily while attending the program within the District. In spite of these records, the District did not schedule an IEP meeting to discuss other options to address the Student's behavior.

Summary and Conclusions:

Based on the following information, the District failed to provide Student educational services in a timely manner.

- The District was informed prior to student's arrival on October 25, 2019, that the Student would be enrolled in the District, yet the Student was not assigned or admitted to an educational program in the District until November 25, 2019 leaving the Student without services for a minimum of 10 days.

- The District was aware that the Student's IEP had lapsed prior to enrollment and was also aware that the previous placement was an out of state residential placement. The District did not hold an IEP meeting to update the IEP or determine placement prior to attendance at the District's programs.
- Prior to the IEP meeting on January 21, 2020, the District implemented services from an out of date IEP from 2017. This IEP was prior to the Student's residential placement due to the Student's behavioral issues and needs.
- The District did not determine the Student's present needs to provide appropriate services and supports beyond those outlined on the expired 2017 IEP.

Based on the findings above, the District failed to fully implement the requirements of 92 NAC 51-004.02, 007.02B and 007.10. Thus, **corrective action is required.**

Corrective Action

1. The District shall provide training to all special education staff that are involved in the development and implementation of IEPs. The training shall include information on when an IEP must be revised and include the requirement for parental participation, placement decisions and focus on the procedures required for a student who has transferred from out of state.
2. The District shall provide the Student with compensatory services. The goal of compensatory education is to place the Student in the position that the Student would be in had the District provided services when the Student enrolled in the District and had a valid IEP in place.
 - a. 120 hours of academic and behavioral services provided by a fully credentialed special education instructor.
 - b. A team comprised of the LEA representatives and the Complainant shall determine the schedule for provision of compensatory services considering the Student's schedule for the 2020-21 school year. At a minimum, the District must provide 120 hours of compensatory services for the failure to immediately provide educational services for Student upon arrival in the District.
 - c. Compensatory services shall be completed by May 1, 2021. Student absence shall result in waiver of service scheduled for that day. Staff absence must be rescheduled. Any compensatory services declined or not utilized by May 1, 2021

shall be deemed waived (assuming the District has made a good faith effort to timely commence and provide all compensatory service).

- d. The schedule for compensatory services shall be provided to NDE within 30 calendar days from the date of this decision.
 - e. Service provider logs verifying completion of all compensatory education services must be submitted to NDE monthly until the service is complete and all service has been verified.
3. The District shall review and modify as needed, all policies and procedures for providing a FAPE to transfer students.

Issue #2

Did the District fail to evaluate Student in all areas of suspected disability in violation of 92 NAC 51 006.02B?

92 NAC 51-006.02B states:

006.02B	<i>Consistent with the consent requirements in 92 NAC 51-009.08A, a parent of a child, the Nebraska Department of Education, another State agency or a local school district or approved cooperative or nonpublic school may initiate a request for an initial evaluation to determine if the child is a child with a disability.</i>
006.02B1	<i>The resident school district or approved cooperative shall conduct a full and individual initial evaluation for each child being considered for special education and related services before the initial provision of special education and related services to a child with a disability. The initial evaluation shall</i>

determine whether a child is a child with a disability, and the educational needs of the child.

Complainant's Position

On November 25, 2019, the Foster Parent, Educational Surrogate, and Guardian ad Litem requested a speech evaluation and appropriate services based on recommendations from the Student's previous residential placement. Although the District originally agreed to evaluate the Student in the area of speech/language, the District at the January 21, 2020 IEP meeting declined to evaluate because the District believed the Student's speech problems could be medication or hearing related. The Student was privately evaluated for speech services and received private speech therapy. The District did not schedule an IEP meeting to review that report or request consent for an evaluation. Consent for evaluation was not requested at the time the Student began to attend the District even though the Student transferred from an out of state program. (Letter of Complaint dated September 1, 2020)

District response

The three-year evaluation was not due until December, 2020, so the District has not requested consent for an evaluation. The last IEP was from December 13, 2017, with the prior Student placement in a residential treatment facility. Consent for evaluation was finally requested by the District on September 3, 2020, because Student's three-year reevaluation was due on December 13, 2020. The parent has not yet signed consent for evaluation of the Student. A request for evaluation was requested by parent in June, 2020 when school was not in session. Appropriate releases and consent forms were provided to parent on September 3, 2020. As of September 28, 2020, the Parent had not completed consent for evaluation. (Letter of Response dated September 25, 2020)

Investigative Findings

When the District was informed on October 18, 2019 by the NDHHS Caseworker that the Student would be coming to the District as a foster placement, they were also informed that Student's last placement was an out of state residential treatment facility because of behavior issues (Letter of Complaint dated September 1, 2020). The last IEP that the District had was dated December 13, 2017, before Student's residential placement. The District did have a valid MDT dated December 13, 2017. The NDHHS Caseworker, Foster Parent, Guardian ad Litem and Educational Surrogate reported concerns about the Student's placement and recommended an out of district placement (Letter of

Complaint dated September 1, 2020 and Letter of Response dated September 25, 2020).

On November 25, 2019, the Foster Parent, Educational Surrogate, and Guardian ad Litem requested a speech evaluation and appropriate services based on recommendations from the Student's previous residential placement (Letter of Complaint dated September 1, 2020). The District agreed to evaluate the Student's speech during the in-take meeting on November 25, 2019 (Letter of Response dated September 25, 2020), however, at the January 21, 2020 IEP the Foster Parent and Guardian ad Litem again requested a speech evaluation. The Educational Surrogate provided the district a hearing evaluation that was completed on January 27, 2020 and a speech evaluation that was completed on April 1, 2020 (Letter of Response dated September 25, 2020).

The District records documented 23 disciplinary removals between November 26, 2019, (the Student's first day of attendance) and the day that school was closed due to COVID-19 (Behavior Detail Report for the 2019-20 school year). Information regarding the disciplinary removals is found in the table below.

Date of Removal	Length of Removal
December 2, 2019	10 minutes
December 3, 2019	Once for 10 minutes Once for 15 minutes
December 4, 2019	25 minutes
December 8, 2019	10 minutes
December 9, 2019	61 minutes
December 10, 2019	17 minutes
December 11, 2019	23 minutes
December 12, 2019	Once for 10 minutes Once for 23 minutes
January 31, 2020	22 minutes
February 4, 2020	15 minutes
February 6, 2020	15 minutes
February 6, 2020	bus suspension
February 7, 2020	25 minutes
February 11, 2020	20 minutes
February 26, 2020	48 minutes
February 28, 2020	10 minutes

The District reported that the Student was being successful in the placement with only two behavior removals to intervention time. District records, however, suggest the Student had significant behaviors warranting removal from the

classroom. The Student was removed from the classroom or bus on more than 23 occasions. The date and length of removals are detailed in the table above. (Behavior Detail Report for the 2019-20 school year)

The Student was also failing most subjects (Student Report Card for the 2019-20 school year). The progress reports from May, 2020 indicate progress could not be determined because of virtual learning due to COVID-19. In addition to academic concerns in reading and math, the Student had behavioral needs as well.

Summary and Conclusions

The District was aware when the Student arrived at the District that the IEP had lapsed and there were concerns raised repeatedly by the Foster Parent, NDHHS Case Manager, Educational Surrogate, and Guardian ad Litem that the Student had significant needs bringing into question the appropriateness of the placement. The District was also aware that the Student was transferring from an out of state residential educational program which automatically requires the District to conduct an evaluation pursuant to 92 NAC 007.08B1. Although the Foster Parent and Guardian ad Litem requested a speech evaluation, the District declined due to possible medication or hearing implications. The District did not provide a prior written notice (PWN) documented the reason for their refusal nor did they request permission to evaluate after they were provided with an independent speech evaluation. The child find obligation is an ongoing, affirmative obligation and is the responsibility of the district, not the parent/guardian. The purpose of evaluation is two-fold, to determine eligibility in specific areas and services required to provide FAPE. It does not appear that the District had sufficient information to develop an appropriate IEP that would provide Student a FAPE.

Based on the District's failure to timely evaluate Student in all suspected areas of disability, the District failed to fully implement the requirements of 92 NAC 51-006.02B. Thus, **corrective action is required.**

Corrective Action

1. The District will complete a full and comprehensive evaluation of Student in all suspected areas of disability following completion of the required consent. When the evaluation is completed, the District will then promptly schedule an IEP meeting to consider the results of that evaluation to develop an IEP that will ensure a free appropriate public education (FAPE) for the Student.
 - a. The District must document the reasonable efforts to obtain consent.

- b. The signed consent form and documentation of reasonable efforts to obtain consent must be sent to NDE within 30 calendar days from the Letter of Findings.
 - c. The full and comprehensive evaluation of the Student must be conducted within 60 calendar days of the date of the Letter of Findings.
 - d. The District must document consideration of evaluations provided by the Foster Parent, Guardian at Litem, and DHHS Caseworker.
 - e. The IEP must be developed within 30 calendar days of the evaluation.
 - f. Copies of the MDT and IEP must be provided to NDE within 10 days of the development of the IEP or no more than 90 calendar days of the date of the Letter of Findings.
- 2. The District shall provide training to all special education staff that are involved in the development and implementation of IEPs. The training shall include information on evaluation requirements, including required evaluations for transfer students.
 - 3. The District shall review and modify as required, policies and procedures regarding evaluations.

Issue # 3

Did the District fail to provide comparable service to the Student who transferred from another state in violation of 92 NAC 51 007.08B?

92 NAC 51-007.08B states:

007.08 *Transfer from outside the state – If a child with a disability (who had an IEP that was in effect in a previous public agency in another State) transfers to a school district or approved cooperative in Nebraska, and enrolls in a new school within the same school year, the new school district or approved cooperative (in consultation with the parents) must provide the child with FAPE (including services comparable to those described in the child's IEP from the previous school district or approved cooperative), until the new school district or approved cooperative:*

007.08B1 *Conducts an evaluation pursuant to Section 006 of this Chapter (determined to be necessary by the new school district or approved cooperative); and*

Complainant's Positions

The District was contacted on August 1, 2019 and informed that the Student was in an out of state residential treatment facility and would be coming to the District upon release October 25, 2019. The Student's last placement was a residential treatment facility out of state. The NDHSS Case Worker, Foster Parent and Guardian ad Litem repeatedly told the District that the placement recommended was not appropriate. The Student was enrolled by the NDHSS Case Worker on October 18, 2019. The Student's disability category was emotional disturbance with developmental and behavior limitations. The Student had been on an IEP for at least five years and had spent approximately two years in residential treatment programs as well as being in multiple foster placements. The Student became easily overwhelmed in the classroom environment with academic skills that were several grades behind same age peers. The District was provided with information regarding the Student thriving in a one-on-one learning instruction program and educational records were provided on at least three occasions. The Student was released from the residential program and was ready to attend the District on October 25, 2019. Student was admitted to the ILP program on November 14, 2019; the Student's first day of attendance was November 25, 2019. (Letter of Complaint dated September 1, 2020)

District Response

The Student was enrolled in the District on November 4, 2019 and started in the District's program on November 26, 2019. The last IEP the District had for Student was dated December 13, 2017, despite repeated requests for additional information from the out of state residential treatment facility. The Student's three-year re-evaluation will be due on December 13, 2020. Consent forms were provided to the Parent on September 3, 2020. Those consent forms have not been returned to the District as of September 28, 2020. The District implemented the 2017 IEP until an IEP meeting was held on January 21, 2020. (Letter of Response dated September 25, 2020)

Investigative Findings

The Student was a transfer student arriving into the District from an out of state residential treatment program serving students with behavior issues. At the intake meeting on November 25, 2019, the District opted to provide comparable services based on the IEP that had been provided which had expired (Letter of Response dated September 25, 2020). The District did not

request a consent for evaluation as the Student's MDT had been conducted December 13, 2017 (Letter of Response dated September 25, 2020). A new IEP was not developed until January 21, 2020. The District was informed repeatedly by the Foster Parent, Guardian ad Litem and NDHHS Caseworker that the Student had significant needs and that the District's program and placement option was not appropriate for the Student.

Summary and Conclusions

When a student transfers into a district from out of state, the District has an obligation to evaluate the Student and until that evaluation is completed, provide comparable services. The District did not seek consent to evaluate the Student until September 3, 2020, more than ten months after the Student enrolled in the District. No services were provided until November 26, 2019, more than one month after Student's arrival in the District. The District was aware that Student had been in a residential treatment facility prior to enrollment in the District. The Student's educational records and history were provided to the District prior to Student's enrollment. Given the circumstances, the District should have requested an evaluation at the in-take meeting and developed an IEP based on the services provided in the residential program and the information available in the expired IEP. Although the District provided the Foster Parent, Guardian ad Litem and DHHS Caseworker a consent form to conduct an evaluation, consent was not requested until September 2020.

Based on the District's failure to evaluate the Student and develop an IEP to replace the one that had expired to provide comparable services, the District failed to fully implement the requirements of 92 NAC 51-007.08B. **Corrective action is required** and is detailed along with the corrective action for Issue#1 and Issue#2.

Notice to District

Unless otherwise indicated, the corrective action specified must be completed within sixty (60) calendar days of the date of this report. Documentation must be submitted as soon as possible following the completion of the corrective actions. All documentation must be sent to:

Kelly Wojcik
NDE Office of Special Education
301 Centennial Mall So.
P.O. Box 94987
Lincoln, NE 68509-4987