

June 19, 2020

Ms. Laurie VanderPloeg  
Director  
United States Department of Education  
Office of Special Education Programs  
400 Maryland Avenue, SW  
Washington, D. C. 20202

Dear Ms. VanderPloeg:

The equitable provision of special education services is a core priority of the Virginia Department of Education (VDOE) and we take our responsibilities to serve students with disabilities, equip parents and advocates, and to hold local education agencies (LEAs) accountable to the provisions of the Individuals with Disabilities Act (IDEA) very seriously. Therefore, VDOE is committed to providing resources and supports that focus on supporting students with disabilities along with their parents, caregivers and families. This commitment and focus is demonstrated by the substantial resources that the VDOE provides through funding to support family engagement activities, collaborative partnerships and events focused on the provision of support to Virginia's students and families. Additionally, for the last seven years Virginia has earned the U.S. Department of Education's highest rating for improving outcomes for students with disabilities and for compliance with the federal Individuals with Disabilities Education Act.

On May 28-29, 2019, four representatives from the Office of Special Education Programs (OSEP) within the United States Department of Education (USED) conducted a general supervision monitoring visit with the Department of Special Education and Student Services (SESS) within the Virginia Department of Education (VDOE). The focus of the visit was on special education monitoring, complaints, mediation, and due process. The VDOE appreciates the ability to dialogue with staff from the USED and the opportunity offered in the letter dated May 21, 2020, to provide comments in response to the "DRAFT VA Monitoring report." Comments have been organized by areas in the report. Regardless of agreement regarding the specifics detailed in the monitoring letter, the VDOE commits to addressing areas of non-compliance and continuing a strong commitment to serve students with disabilities and their families throughout the Commonwealth.

### **General Supervision**

The Division of Special Education and Student Services is responsible for general supervision and monitoring of the implementation of the IDEA in accordance with the provisions at 34 CFR 300.604(a)(1), and (a)(3), (b)(2)(i) and (b)(2)(v), and (c)(2) and the *Regulations Governing Special Education Programs for Children with Disabilities in Virginia* (the Virginia

Regulations), 8 VAC 20-80. Virginia's general supervision is a system that involves the following components: State Performance Plan (SPP) and Annual Performance Reports (APR), effective policies and procedures, targeted technical assistance and professional development, effective dispute resolution system; integrated on-site and off-site monitoring activities, data verification, improvement and corrective action planning, and follow-up to ensure timely corrections.

Consistent with these requirements, the VDOE has revised its monitoring of special education to implement results driven accountability (RDA). The revised monitoring system is based upon targeted need as determined by data analyses of the state's SPP and APR, which incorporates both results data and compliance data generated from several different sources, including the *Elementary and Secondary Education Act*; Virginia's Standards of Learning; Discipline, Crime, and Violence Annual Report; Special Education Child Count; and other quantitative and qualitative data sources. The shift to RDA brings a more balanced approach to determining program effectiveness, focusing on how well students are performing while continuing to protect their rights.

An example of this balanced approach was demonstrated in practice stemming from a complaint the VDOE received alleging that an LEA violated federal and state laws and regulations governing special education programs. The Office of Dispute Resolution and Administrative Services (ODRAS) collaborated with the Office of Special Education Program Improvement (SEPI) and determined the VDOE would conduct a full compliance review of the LEA's special education policies, procedures, and practices in order to ensure compliance with the *Individuals with Disabilities Education Act* (IDEA). The on-site portion of the review was conducted over a five-day timespan with a report issued soon after. Monitoring activities of the compliance-driven aspects of the report included an on-site follow-up review of records, and a review of additional documents submitted by the division. The result of these activities revealed that the identified findings of noncompliance have been corrected; therefore, the VDOE documented closure for this monitoring activity. While VDOE staff discussed this example during the on-site visit, no additional questions or documentation was requested by staff from the OSEP.

However, in consideration of the general supervision monitoring visit conducted by OSEP in May of 2019, VDOE staff members have worked diligently to develop a document titled *Virginia's System of General Supervision of IDEA: Complying with State and Federal Requirements*. This document has also been shared with OSEP funded technical assistance centers for review and feedback. The purpose of the document is to outline the intricacies of Virginia's multi-faceted monitoring processes based on an OSEP model. The VDOE has also initiated a Request for Proposal (RFP) to procure additional monitoring tools to assist local and state staff members in more efficiently meeting the requirements for monitoring and implementation of the IDEA.

Also, within the General Supervision section OSEP noted two instances that were utilized as illustrative of Virginia's general supervision procedures. As noted in the report, OSEP received this information through "a copy of a State complaint filed on behalf of a group of children alleging systemic noncompliance by an LEA" and another "copied on emails between a parent and school staff." Neither one of these instances were specifically addressed during the

monitoring visit, nor were additional information, communication or complaint documents requested from the Virginia Department of Education (VDOE). The VDOE is seeking to clarify the position OSEP has taken without the entire scope of information and details related to these cases. As with several other instances in its draft, OSEP has provided only vague information that leaves the VDOE responding to matters without the benefit of context.

In a July 23, 2013, Memo, the United States Department of Education (USED) makes it clear that States have flexibility to provide families with more protections, USED stated: ‘States may choose to accept and resolve complaints regarding alleged violations that occurred outside the one-year timeline, just as they are free to add additional protections in other areas that are not inconsistent with the requirements of the Act and its implementing regulations.’ The Virginia Regulations, adopted in 2009, specifically limit state complaint investigations to incidents occurring in the previous 365 calendar days. In short, VDOE possesses no discretion to extend or waive this regulatory requirement. Also of note, the 2006 implementing regulations of IDEA 2004, at 34 C.F.R. §300.153(c), states that a complaint must allege a violation that occurred not more than one year prior to the date that the complaint is received by the State Educational Agency (SEA). In contrast, the applicable regulations addressing due process hearings (34 C.F.R. §§ 300.507 and 300.511(f); 8 VAC 20-81-210.E) provide that a request for due process must allege a violation that occurred not more than two years before the date the parent knew or should have known about the alleged action that forms the basis of the due process request. In its *Analysis and Commentary* accompanying the issuance of the 2006 regulations, the USED spoke to the distinction between the respective timelines for filing a state complaint and requesting a due process hearing, and specifically rejected the suggestion that the state complaint timeline be broadened to include exceptions such as those applicable to due process.

In its *Analysis of Comments and Changes* for the 2006 implementing regulations, the USED, OSEP has stated that state education agencies—such as the VDOE—are “required to resolve any complaint that meets the [sufficiency] requirements” set forth in the 2006 implementing regulations, “including complaints that raise systemic issues...”<sup>[1]</sup> OSEP has also stated that “the broad scope of the State complaint procedures, as permitted in the regulations, is critical to each State’s exercise of its general supervision responsibilities. The complaint procedures provide parents, organizations, and other individuals with an important means of ensuring that the educational needs of children with disabilities are met and provide the SEA [state education agency] with a powerful tool to identify and correct noncompliance...”<sup>[2]</sup> Accordingly, this office is authorized to investigate alleged systemic violations of special education regulations.

More recently, the Office of Special Education and Rehabilitative Services (OSERS) (USED) has clarified that a “State complaint alleging systemic noncompliance could be one that alleges that a public agency has a policy, procedure, or practice applicable to a group of children that is inconsistent with Part B or the Part B regulations. An example of a complaint alleging systemic noncompliance is a complaint alleging that an LEA has a policy, procedure, or practice that would limit extended school year (ESY) services to children in particular disability categories or the type, amount, or duration of services that can be provided as ESY services. If the complaint names certain children and alleges that the same violations apply to a class, category, or similarly situated children, the state education agency must review all relevant information to resolve the

complaint, but would not need to examine additional children if no violations are identified in the policies, procedures, or practices for the named children. However, if the SEA identifies violations for any of the named children, the SEA's complaint resolution must include measures to ensure correction of the violations for all children affected by the alleged systemic noncompliance described in the complaint. Additionally, the SEA would need to examine the policies, procedures, and practices that may be causing the violations, and the SEA's written decision on the complaint must contain procedures for effective implementation of that decision, including corrective actions to achieve compliance.”

Moreover, OSEP’s assertion that parent complaints that do not fit within the one year statute of limitations or that are identified as insufficient go unaddressed and thus we have failed to comply with our general supervision duties is inaccurate. The broad authority vested in VDOE to monitor local education agencies is not limited to on-site reviews and the dispute resolution processes. First, the meaning of the word complaint is very specific in the regulations, with requirements for sufficiency. However, as noted by our staff during the OSEP visit, all complaints identified as insufficient are considered inquiries, not dismissed complaints, and the manner in which the parent’s concerns can be addressed, if outside of our purview, is provided; as is the means to cure the complaint’s insufficiency.

In addition, verbal complaints, which do not fit within the sufficiency requirements, are addressed via technical assistance phone calls to school divisions. All SESS staff members regularly work to resolve parent concerns by providing guidance documentation, acting as intermediary between school division staff and parent, and collecting data regarding the types of sufficient complaints that are resolved to monitor areas of perpetual noncompliance or of possible concern. In addition, ODRAS shares the data it collects with the office of SEPI to assist with guiding SEPI’s on-site investigations, which include parent interviews, file reviews, and staff/administration interviews.

Furthermore, SESS uses data obtained by all offices within the VDOE, which includes parent complaints, to guide professional development offerings to school divisions, noting that “professional development” and “on-site training” are acceptable means of satisfying corrective action. Thus, parent complaints that are insufficient are addressed under VDOE’s general supervision authority.

That being said, the VDOE does not open complaint investigations without the sufficiency requirements being met. It is the agency’s strong belief, well supported by the IDEA, that disputes should be resolved in as informal a manner as possible. To investigate a complaint that a parent does not wish to pursue would simply serve to harm relationships that the IDEA attempts through many aspects of its dispute resolution provisions to preserve.

### **State Complaint Procedures**

Information contained in the factual background section of OSEP’s report refers to a singular complainant; none of this information was shared with VDOE staff during the monitoring visit. OSEP has drawn several conclusions based on a limited representation of communication, as it is

not VDOE's practice to copy parties other than the parent unless there is an issue for that individual to address. The VDOE reviews the mailbox regularly and responds as necessary. Most of the issues raised were not within VDOE's jurisdiction; many others were matters that had been previously addressed or were time-barred subsequent communication from the VDOE to the complainant identified these issues. OSEP asserts that there were at least two instances in which the parent made complaints that could be investigated, without identifying the subject matter or time frame. It assumed that VDOE had not investigated these matters. In fact, VDOE has opened, investigated and issued findings on a number of complaints. In short, OSEP has made a determination on a singular complaint within the VDOE's state complaint procedures without a full review of the information, communication and complaint documents.

### **Due Process Complaint and Hearing Procedures**

As follow-up to the on-site visit, OSEP wrongly asserts that Virginia does not have procedures in place to monitor its LEAs' compliance with the resolution period timelines. OSEP may wish to view VDOE's document entitled [Managing the Timeline in Due Process Hearings: Guidance Document for Special Education Hearing Officers](#) ("Managing the Timeline") in which VDOE reviews non-expedited and expedited timeline calculation, as well as issues related to the resolution meeting and period with hearing officers. As shared with OSEP, ODRAS' resolution meeting data tracking for 2018-2019 contained the following data fields; occurrence of a resolution meeting, and whether a written resolution agreement was reached through the resolution meeting, the answers to which are required for Part B reporting. The VDOE advised that hearing officers monitor compliance with resolution meeting deadlines and may grant extensions to resolution periods or continuances of the 45-day timeline (for good cause, in the best interests of the student) if requested by the parties. *See Managing the Timeline* at p. 24 ("The hearing officer needs to monitor the progress of the resolution meeting and any ongoing mediation."); *see also, id.* at p. 38 (sample Pre-Hearing Report confirming the hearing officer has discussed the resolution meeting with the parties); *see generally id.* (discussing continuances: when they're appropriate and how to document them). OSEP notes that whether a continuance was granted or a resolution meeting was held is not documented in final decisions posted to VDOE's website. It appears a clarification is necessary; hearing officers note continuances to the timelines through Pre-Hearing Orders and Reports and those continuances are not always repeated in a final decision on the merits of the case. *See, e.g. Managing the Timeline* at p. 4 ("A hearing officer's pre-hearing order should identify any resolution period to be applied. (see Appendix F). In addition, any other determinations affecting the overall time period must be carefully documented.") Further, the VDOE receives reports from the VDOE Monitor (which specifically address whether the hearing officer determined the status of the resolution meeting), and if necessary to gather comprehensive data. The VDOE follows up on this information with the LEA.

The VDOE similarly monitors whether a case is expedited or non-expedited and hearing officers have been trained extensively on the timelines. OSEP incorrectly concludes that VDOE calculates all deadlines based on a non-expedited timeline. A review of VDOE's 2018-2019 logs provided at the on-site visit should reveal that decision due dates for expedited cases are *not* calculated based on a non-expedited timeline. For expedited cases, hearing officers work with the parties to assess "school days" based on the school calendar. Further, because decision due

dates are based on the date of the hearing, the decision date can not be simply “calculated” by VDOE until the hearing date is set. The VDOE monitors Pre-Hearing orders and/or reports from the hearing officer when tracking these deadlines.

Additionally, beginning in the 2019-2020 school year (due process cases filed on or after July 1, 2019), the VDOE began tracking *additional* fields; those pertaining to resolution now include: resolution meeting due date (for both expedited and non-expedited cases), date resolution period ends (for both expedited and non-expedited cases), whether the resolution meeting was conducted (for Part B reporting purposes, note that the answer is “no” if parties mediated in lieu of a resolution meeting session; mediation data is collected by VDOE in a separate document), resolution meeting date, whether the resolution meeting was timely, and whether a written resolution agreement was reached by the end of the resolution period. A note is indicated if a resolution meeting was not held because a mediation occurred.

Although this information is likely to be included in a Pre-hearing Report or Order from the hearing officer, once the due date for the resolution meeting has passed, VDOE reaches out to the LEA with a series of questions targeted at ensuring all of the above data is collected timely and to ensure a resolution meeting is completed. The VDOE recognizes that not *all* of this data was recorded in database form prior to 2019-2020, but asserts that it was being monitored through hearing officers, Pre-Hearing reports/orders, phone calls, emails, and discussions with VDOE Monitors. The VDOE maintains that it monitored the relevant data prior to this date and has since strengthened its process. Although VDOE maintains that it is in compliance, should OSEP find a noncompliance in this area, VDOE maintains that it has already taken steps to strengthen its tracking system. Since OSEP’s visit, VDOE updated its tracking system (as described above) and reiterated to hearing officers the importance of including this information in orders on the record at the 2019 hearing officer training.

The VDOE recognizes that some state education agencies have an online program for streamlining the collection of this data from hearing officers; while VDOE is investigating such systems for future use and streamlining of the data collection process, use of such a system is not necessary for compliance with the relevant laws and regulations. Similarly, VDOE is willing to create a standard form for use by hearing officers that would require a clear and straightforward outline of timelines (including continuances) in a particular case with information about when a resolution meeting occurred that each hearing officer would be required to complete and include in the formal record (with copy to VDOE) for every case.

### **Mediation**

In its draft report, OSEP wrongly states as factual background the “active participation of the State’s mediation coordinator in the mediation sessions themselves, in addition to the mediator of record.” The Coordinator of Mediation Services, a VDOE employee, does not mediate either with new or experienced mediators. Neither does the Coordinator attend all mediations.

Either party may ask the Coordinator to assign a different mediator if they are not satisfied with the initial contact or the conduct of the mediation itself. A different mediator is always then

assigned. Mediators may also decline an assignment. Feedback measures utilized by the VDOE include providing consumer evaluations for meeting participants along with a self-addressed stamped envelope, to return to the Coordinator. When the Coordinator of Mediation observes mediators as a quality control measure, he introduces himself and his purpose and finds a seat away from the table to silently observe the mediator. He is not there as an authority, but as a colleague with the mediator, both of them trained as neutrals, one acting as the neutral and one silent. There is no conflict of interest or divergence from the mediator's attention or impartiality. There is no distraction for the parties. The debriefing session with the mediator after the mediation is over is an opportunity to encourage moving from reflexive practice to reflection on the intervention choices made and the choices available in the session. This contributes to the professional growth of the mediator and, consequently, to maintaining a high standard of quality in the mediation program. Mediators may seek guidance on the tradecraft of a case. As a recent example, a mediator was concerned with how to approach limiting an excess of invitees for a Zoom conference. The Coordinator does not involve himself in substantive issues.

Particular strengths of the Virginia Mediation Service are the experienced pool of mediators the agency is able to draw from and the further training VDOE is able to offer them. Our mediators who work for the courts, FEMA, other federal agencies, REDRESS and community programs uniformly report that the stakes, complexity and emotional tone of special education mediations is unmatched in their experience. The cases often have dueling expert testimonies and may include attorneys. The mediators are independent contractors who have responded to an RFP search. They do not have other relationships with schools or parents, or attorneys, or advocates representing any party.

The IDEA is silent on how mediators are to be trained. Under Article 10, that is left to the states. Co-mediation is commonly practiced in many mediation venues, particularly for training of new mediators. It is used in Virginia for training purposes, pairing a new mediator with an experienced mediator on the VDOE roster. This provides support while the new mediator is at the steepest part of the learning curve.

Unlike his counterparts in most other states, the Coordinator of Mediation at the VDOE is an experienced special education mediator and trainer. He is a Senior Advisor to CADRE on the subject and practice of mediation in special education disputes. Over the years, twenty three other states, most recently North and South Carolina, who had no one in the SEA with this experience, have enlisted him to train their mediators. He has used role play to train thousands of community mediators. It is an effective and evidence-based tool for training community or court-related mediators. It can not effectively duplicate the authenticity, complexity of issues, or emotional demands of a special education mediation.

### **Independent Educational Evaluations**

The information presented in the factual background section of the draft report from OSEP refers to "communication with OSEP" from Virginia. While no specific communication was identified, the VDOE did submit a letter to OSEP following the on-site visit. In early August, OSEP requested a telephone conference (that was held on August 15, 2019) with VDOE regarding one aspect of the matters addressed during the on-site visit, namely Independent Educational

Evaluations (IEEs). Also of note, OSEP has not identified any particular areas of noncompliance, but, rather, simply alludes to “communications” that it does not identify, suggesting generally that school divisions have denied parental requests for IEEs. Further, to the extent OSEP may be referring to interpretations of its guidance letters (e.g., Letter to Baus; Letter to Carroll), OSEP has failed to identify specific actions by VDOE regarding these letters. Additionally, and significantly, OSEP has failed to acknowledge that its guidance letters, by OSEP’s own language/terms, are not legally binding (“Based on section 607(e) of the IDEA, we are informing you that our response is provided as informal guidance and is not legally binding, but represents an interpretation by the U.S. Department of Education of the IDEA in the context of the specific facts presented”). The USED has reiterated this general premise (i.e., “Guidance documents represent the agency’s current thinking on a topic. They do not create or confer any rights for or on any person and do not impose any requirements beyond those required under applicable law and regulations. Guidance documents lack the force and effect of law.”)[1] in a range of contexts, from individual policy letters to broader guidance materials.

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[1] <https://www2.ed.gov/policy/gen/guid/types-of-guidance-documents.html>.

Finally, to the extent OSEP may seek to challenge VDOE’s regulations addressing IEEs (8 VAC 20-81-170.B.2), USED has received and approved Virginia’s Part B application every year--for ten years--since the enactment of the most recent revisions of the *Regulations Governing Special Education Programs for Children with Disabilities in Virginia* without any objection or request for clarification from USED to any regulatory provision. Also of note, this area has not been identified or addressed for support by our IDEA Part B state lead in communication with VDOE staff.

### **Additional Considerations**

The Differentiated Monitoring and Support (DMS) and State Education agency (SEA) Determinations establish Virginia as a highly ranked state in the federal accountability system. For the seventh consecutive year, Virginia has met requirements on the SEA Determination. In fact, Virginia typically ranks in the top five of all states and territories on overall percentage with SEA Determinations being the highest ranked on multiple occasions as recently as 2018. Virginia frequently receives requests to serve as exemplar state on presentations and receiving of accolades from USED funded Technical Assistance Centers as well as USED funded grants;

- Co-presenter with Center for IDEA Fiscal Reporting (CIFR) on Comprehensive Coordinated Early Intervening Services (CCEIS) (October, 2019)
- Served as state leader panelist for IDEA Data Center Interactive Institute (March, 2020)
- Requested and served as state exemplar for LEA Determinations: Establishing a Process That Supports Program Improvement (April, 2020)
- Invited presenter for Westat Equity Forum (Date TBD)
- Accepted presentation and poster at the 2019 OSEP Leadership Conference
- Accepted presentation at the 2018 OSEP Project Directors Conference

- Recipient of multiple federal grant awards including: State Personnel Development Grant (H323A170018); School Climate Transformation Grant (S184F140020 and S184F180014); and Mental Health Service Professional Demonstration Grant (S184X190023)

As part of the Part B application process, the VDOE is required to submit its state special education regulations along with a summary of how those regulations exceed federal requirements. Virginia's Part B application has been accepted for ten years since the enactment of the most recent revisions of the *Regulations Governing Special Education Programs for Children with Disabilities in Virginia* without any objection or request for clarification from USED to any provision. Many of the areas and specific cases referenced in the factual background sections of the draft report are based on singular complaints of which OSEP is lacking a comprehensive and complete record of communications, evidence, and findings. Also significant is the lack of specific state-based communication to Virginia from our state lead. Given the timing of the on-site visit being responsive to singular constituent complaints, Virginia finds the support from OSEP staff focused on comprehensive policies, practices, and procedures lacking. To date, there have been no specific offers of technical assistance to Virginia from either OSEP or a funded technical assistance center aligned with the "concerns" identified in the draft report.

### **Summary**

In summary, the VDOE respectfully requests for the OSEP to thoughtfully review the information and details shared above. The VDOE also specifically requests that OSEP strike the following areas within the monitoring letter to which clarification and details provided in this response have identified as being categorically false;

- Page 1: OSEP alludes to an "unusually high number of customer service communications". Prior to, during and following the onsite visit VDOE has requested additional information regarding these calls. While not requesting personally identifiable information, the VDOE has requested, region of the state, specific frequency of calls and topical areas in order to more accurately identify and address OSEP's concerns. To date, the VDOE has not been provided with this information. Also the previous information shared by VDOE points to a very limited and specific set of constituent calls that prompted the onsite monitoring and the findings in OSEP's letter
- Page 2: OSEP identifies that in preparation for the onsite monitoring visit OSEP staff reviewed "emails and phone calls from parents and advocates". As identified previously, OSEP's review did not review communications in total from the state education agency or local education agencies as a part of their review. This limited review of information has made it challenging for OSEP to address specific areas of non-compliance when the communication from both the SEA and LEA perspective provided valuable information regarding addressing many of the "complaints".
- Page 4: OSEP states that "VDOE does not have procedures in place, outside of formal dispute resolution procedures, to identify whether noncompliance has occurred" as also addressed previously in this letter VDOE has a variety of avenues for addressing complaints shared across its dispute resolution system as well as its general supervision

- system. Examples of utilization of both of these mechanisms to ensure, monitor and investigate compliance have been shared as examples and should be reflected accurately.
- Page 6: OSEP states that “Currently, VDOE only conducts on-site monitoring of a very limited number of LEAs each year (between 3% and 4.5% of all LEAs)”. This is also, factually incorrect as the VDOE shared during the onsite visits. This figure does not incorporate the totality of the state’s general supervision across all LEAs that includes systemic investigations, compliance on-site monitoring tied to school quality or additional investigations that fall under the purview of the SEA. As such, this statement should be clarified in order to reflect the true representation of Virginia’s general supervision.
  - Page 13: OSEP states that “Also, the presence of a SEA employee could have a chilling effect on the parties to the mediation and operate to inhibit their free and frank exchange with the mediator. “ As the VDOE has explained the role of the mediation coordinator is not that of a mediator or co-mediator in mediation sessions. As such, this statement should be removed in order to address accuracy of OSEP’s findings.

Considering VDOE’s concerns with the factual basis underlying many of the findings, the VDOE requests that USED take the time to consider all policies, procedures and practices before finalizing any specific finding and subsequent required actions. Valid concerns have been identified in each of the five areas concerning the factual basis and the VDOE would welcome the opportunity to work with OSEP to clarify based on all facts and ensure an accurate representation of the Commonwealth.

Regardless of agreement regarding the specifics detailed in the monitoring letter and shared above, the VDOE commits to addressing areas of non-compliance and continuing a strong commitment to serve students with disabilities and their families throughout the Commonwealth. The VDOE has appreciated the comments that OSEP has communicated to states, and to Virginia in particular, that address a willingness to dialogue about the process used and how it can be more results-based, equitable, transparent, and responsive to needs of state education agencies. The VDOE respectfully requests that the follow-up from this onsite monitoring visit could be conducted using a more collaborative and transparent process.

Sincerely,



Dr. Samantha Marsh Hollins  
Assistant Superintendent of Special Education and  
Student Services  
Division of School Quality, Instruction and  
Performance  
Virginia Department of Education