



State of New Jersey
OFFICE OF ADMINISTRATIVE LAW

FINAL DECISION

OAL DKT. NO. EDS 01697-20

AGENCY DKT. NO. 2020-31089

S.W. AND J.W. ON BEHALF OF J.W.,

Petitioners,

v.

ELIZABETH CITY BOARD OF EDUCATION,

Respondent.

Donald A. Soutar, Esq., and **Saran Q. Edwards**, Esq., for petitioners (John Rue & Associates, attorneys)

Richard P. Flaum, Esq., and **Amy A. Pujara**, Esq., for respondent (DiFrancesco, Bateman, Kunzman, Davis, Lehrer & Flaum, attorneys)

Record Closed: January 15, 2021

Decided: February 19, 2021

BEFORE **KELLY J. KIRK**, ALJ:

STATEMENT OF THE CASE

Petitioners, S.W. (Mom) and J.W. (Dad) (collectively, the parents) on behalf of J.W., filed a petition for due process against respondent, Elizabeth City Board of Education (Board or District), alleging that the District denied J.W. a free, appropriate

public education (FAPE) by failing to provide him with “door-to-door” transportation services.

PROCEDURAL HISTORY

On or about January 2, 2020, the parents filed a petition for due process against the Board seeking a determination that the District denied J.W. a free appropriate public education (FAPE) by failing to provide him with “door-to-door” transportation services and seeking compensatory education. The matter was transmitted by the New Jersey Department of Education (the Department), Office of Special Education Policy and Dispute Resolution, to the Office of Administrative Law (OAL), where it was filed on February 4, 2020.

Hearing dates were scheduled for April 28, 2020, and May 4, 2020. Said hearing dates were adjourned at the parties’ request due to the COVID-19 pandemic. The hearing was held on September 30, 2020, and October 7, 2020. Written summations were submitted on a final date, January 15, 2021, at which time the record closed.

FACTUAL DISCUSSION

Findings of Fact

Michael Rijo (director of Transportation), Rebecca Wood (special education teacher), Vanessa Correia (speech-language therapist), Nancy Morales-Frigoletto (supervisor of Special Services), and Diana Pinto-Gomez (director of Special Services) testified on behalf of the Board. Mom, Dad, and Christina Allen (behavior analyst) testified on behalf of petitioners.

Having had an opportunity to consider the evidence and to observe the witnesses and make credibility determinations based on the witnesses’ testimony, I **FIND** the following **FACTS** in this case:

J.W. was given a diagnosis of expressive speech delay, stereotyped behavior, and autism spectrum disorder by Jeffrey Kornitzer, M.D., pediatric neurologist, on April 4, 2017.

J.W. was enrolled in the District and attended the District's special-education preschool for the 2017–2018 and 2018–2019 school years. During those school years, the school bus picked him up and dropped him off at home.

Christina Allen has been a board-certified behavior analyst (BCBA) since 2018. She was hired by the parents, and began working with J.W. in July 2018 at home.

Michael Rijo has been the District's director of Transportation for four years, and prior thereto was the assistant director. The District employs approximately thirty-five drivers and transports approximately 5,800 students. The District drivers are unable to transport all the students, so transportation of the remainder of the students is contracted. The District endeavors to utilize District drivers for the transportation of special-needs students. Rijo designs the bus routes for the students, dividing up the city and assigning routes. It is the policy of the District not to have bus stops on a dead-end street, and the Transportation Department does not allow buses to back up during student pick-ups or drop-offs. Rijo has never had a bus stop on a dead-end street during his tenure as assistant director and director. He follows Department of Transportation (DOT) and New Jersey Motor Vehicle Commission guidelines.

Petitioners reside on a dead-end street, which is not a cul-de-sac, so the bus must "back" or reverse to transport the student if the stop is petitioners' home. The bus stop is at the corner intersection of petitioners' dead-end street and the cross street. The petitioner's home is located eight houses from the corner.

The parents and their advocate attended the June 21, 2019, IEP meeting. The June 21, 2019, IEP (June IEP) reflects J.W.'s special-education programs and related services as: Special Class Autism: Functional Academics; Speech-Language Therapy: Individual; Speech-Language Therapy: Group (not to exceed 5); Occupational Therapy: Group; Occupational Therapy Consultation: Individual; Shared Aide: Group; and "Special

Transportation: Door to Door Transportation.” (P-1.) The transportation is twice daily. (P-1.)

The June IEP Statement of Special Education Programs and Related Services specifies “Special Transportation Related Services” for the period July 5, 2019, to June 21, 2020, as: “Door to Door Transportation,” and “AM/PM Home pick up and drop off. [J.W.] should be closely monitored on the bus. [J.W.] has a diagnosis of Autism.” (P-1.) It also reflects under Notice Requirements for the IEP and Placement:

As a result of the reevaluation eligibility determination meeting, the district proposed that the student continues to be a student with a disability and receive an Individualized Education Program (IEP). This IEP states the proposed disability and services to be provided.

It was determined that the student continues to have a disability as defined in N.J.A.C. 6A:14-3.5 or 3.6 which adversely affects the student’s educational performance.

[P-1.]

School commenced on September 5, 2019. On September 6, 2019, at 10:40 a.m., Mom emailed Michael Rijo and seven other District employees, and copied Mom, Dad, and their advocate, indicating that she was expressing her concerns about J.W.’s transportation; that the IEP clearly stated that his transportation was to be door-to-door, which had not taken place; that she had received a letter stating that the bus stop would be on the corner, but that was not what was agreed upon in the IEP; and that this was the third year that this issue has taken place. She asked when the appropriate transportation process would be in place, as it is an essential element in getting J.W. to school. (P-2.) Diana Pinto-Gomez responded to all, and added the District’s attorney, at 11:27 a.m., stating, “We updated this yesterday after your last email that it is door to door transportation.” Mom responded to all at 11:29 a.m. stating, “Great, information was updated, however, no transportation came to get [J.W.] today.” Mom emailed all at 11:27 a.m., requesting that someone from the Transportation Department provide an update as to when the bus would start picking J.W. up, and requesting the bus number, bus

company, and bus route. (P-2.) At 6:17 p.m., Jose Laranjeira, Transportation Department coordinator, emailed all as follows:

This student lives on a dead end street. The buses are not allowed to come into a street and back up out of the street. The closest pickup is that nearest corner.

[P-2.]

On September 9, 2019, at 11:49 a.m., respondent's attorney emailed the parents' advocate and Pinto-Gomez, stating, inter alia, that there have been a few initial glitches with transportation that they were trying to resolve as quickly as possible; that the bus cannot turn around on the parents' street, and therefore the District must request that the student go to the nearest corner; and that the law is clear that the District has the right to set the route. At 2:47 p.m. the advocate responded that the IEP clearly states that the transportation is door-to-door, and had previously been door-to-door, and asking why it is an issue now. (P-2.) At 9:20 p.m. respondent's attorney responded and advised that J.W.'s bus will not be able to turn around on the dead-end street because it is unsafe to drive down the dead-end street and back up, and asking that the advocate have J.W. come to the corner. (P-2.)

On September 11, 2019, at 12:49 p.m., the advocate emailed respondent's attorney, stating that they were disappointed with the District's decision, and if it was door-to-door in the past there was no reason for it to have changed, and that Mom advised that she was at the bus stop that morning, but no bus arrived; the advocate asked for confirmation of the location and time of pick up and drop off and the bus number, route number, and bus company. At 1:26 p.m. respondent's attorney responded that the buses for preschool and kindergarten are different and that there is a safety issue on a dead-end street.

On September 12, 2019, the parents' advocate filed on their behalf a complaint with the Department, and stated that the alleged violation was as follows:

Transportation is not being provided door-to-door as agreed upon in the current IEP. While in preschool door-to-door was provided, but now that the student is in kindergarten, the transportation has changed without the parents['] agreement in the IEP.

The September 12, 2019, complaint stated the relevant facts as follows:

The current IEP clearly states that transportation will be provided door-to-door. While in preschool, although the program was in the same location, this was not an issue. Now the district is telling the parents that because of the size of the bus, and the fact that the parents live on a dead-end street, the bus cannot perform the necessary U-turn at the end of the street.

This issue would constitute a change in the agreed upon IEP, which the parents have not provided their consent to amend.

The September 12, 2019, complaint described that the issue could be resolved as follows:

This issue can be resolved by providing transportation using a more appropriate vehicle. If this was not an issue in the past, why has this become an issue now? We questioned what has changed. The district responded that they are using a different transportation company for that route, and the bus cannot turn around on the dead end. We would ask that that district honor the IEP and provide the necessary and appropriate vehicle that can safely turn around and still fulfill the tenants [sic] of the current IEP.

[P-2.]

Per a Department Complaint Investigation Report, an investigation was initiated on September 13, 2019, after the parents' advocate alleged that the District did not provide door-to-door transportation services required by the IEP. (J-11.) As a result of the complaint, the District was "directed to invite the parent to an IEP meeting for the purpose of conducting further discussions regarding transportation, as a related service, for the student and implementing any mutually agreed upon accommodations." (J-11.)

The parents and their advocate attended an IEP meeting on December 17, 2019. The December 17, 2019, IEP (December IEP) reflects J.W.'s special-education programs and related services as: Special Class Autism: Functional Academics; Speech-Language Therapy: Individual; Speech-Language Therapy: Group (not to exceed 5); Occupational Therapy: Group; Occupational Therapy Consultation: Individual; Shared Aide: Group; and "Special Transportation: Station." (J-1.) The transportation is twice daily. (J-1.)

The December IEP Statement of Special Education Programs and Related Services specifies "Special Transportation Related Services" for the period December 18, 2019, to June 21, 2020, as: "Station" and "AM/PM Home pick up and drop off. [J.W.] should be closely monitored on the bus. [J.W.] has a diagnosis of Autism." (J-1.) It also reflects under Notice Requirements for the IEP and Placement the following:

As a result of the New Jersey Department of Education's (DOE) mandate, this IEP meeting was held. This mandate was to change the transportation from "door to door" to "station" pickup. At the same time, [J.W.'s] parents requested a review of [J.W.'s] progress. This IEP states the proposed disability and services to be provided.

It was determined that the student continues to have a disability as defined in N.J.A.C. 6A:14-3.5 or 3.6 which adversely affects the student's educational performance.

[Parents] requested that data be taken to determine if [J.W.'s] toileting is consistent. The classroom teacher will send home at the end of each week his toileting data.

[Parents] requested ABC data be taken to determine the cause of [J.W.'s] flopping, crawling and throwing behaviors. The classroom teacher will collect the data[.]

[J-1.]

In the June IEP and December IEP, the Occupational Therapy Evaluation, dated May 13, 2019, reflects:

[J.W.] presented with escape/avoidance/defiance behaviors and decreased sensory regulation during the individual assessment portion of the evaluation, but these behaviors

quickly diminished once his classmates and school staff entered the room where the evaluation was taking place. [J.W.] has difficulty with self-regulation during unstructured and unfamiliar activities. This presents itself as difficulty remaining seated, avoidance/escape/and defiant behaviors, and self-soothing behaviors including mouthing his finger and other nonfood items.

[P-1; J-1.]

Additionally, in the June IEP and the December IEP, the Occupational Therapy Evaluation, dated May 30, 2018, reflects that “[J.W.] was observed in the classroom environment before and after the individual assessment session, which took place in a conference room with [J.W.’s] mother present, at her request,” and further reflects:

Outside of the structured classroom environment, [J.W.] became very dysregulated. He responded minimally or not at all to verbal and manual prompts, including from his mother, to engage in evaluation tasks at tabletop. His voice became louder, he moved quickly and impulsively around the room sometimes throwing himself on the floor, began mouthing and chewing on his fingers, and threw several blocks across the room. These behaviors persisted to a milder degree when he returned to the classroom to complete the evaluation. However, once his peers returned from physical education and began a familiar, structured activity, the dysregulated behaviors abruptly stopped as [J.W.] smoothly transitioned with his peers to a calendar activity on the carpet. It should also be noted that the dysregulated behaviors were not observed during breakfast and cleanup, before the individual assessment in the conference room. His dysregulated behavior appeared to be a response to an unawareness or uncertainty of the expected sequence of events. The significant difference in [J.W.’s] behavior clearly indicates that [J.W.] responds very well to classroom routines and structured activities and becomes dysregulated without them.

[P-1; J-1.]

The Present Levels of Academic Achievement and Functional Performance (PLAAFP) in the June IEP and December IEP include the following June 2019 comments from J. Principe with respect to behaviors:

- Daily Living Skills: J.W. responds well to the structure of the classroom and does not exhibit behaviors that interfere with his learning. (P-1; J-1.)
- Social/Emotional/Behavioral: Based on observations, J.W. occasionally engages in escape-motivated behavior, exhibited as flopping to the floor or attempting to leave the work area. Blocking the escape and keeping the demand have shown to be highly effective in reducing this behavior. Escape-motivated behavior is most commonly observed in unfamiliar situations or with unfamiliar people. J.W. benefits from having a structured routine and an expectation of what is to come and the demands that may be placed on him. New transitions and demands may cause flopping or crawling, but he is typically easily redirected, once it is clear that the demand is still present. (P-1; J-1.)

The Behavioral Interventions section in the June IEP and December IEP reflect “No” in response to “Are Behavioral Interventions Appropriate at This Time?” The Rationale for Removal from General Education reflects, in pertinent part, the following:

Many options were considered when planning [J.W.’s IEP]. A supported regular education classroom was considered to facilitate greater use of mainstream curriculum and materials and maximum participation with non-disabled peers and the opportunity. Instructional modifications, a personal assistant, behavior intervention plan, occupational and speech therapy were all supplementary aids and services in the general education classroom were all considered. These options were rejected as they are not sufficient in supporting [J.W.’s] academic growth.

[P-1; J-1.]

The Modifications in the June IEP and December IEP include: Use a consistent daily route; Break down tasks into manageable units; Provide hands-on learning activities; Provide modeling; Give direct and uncomplicated directions; Provide easier tasks first; Provide short breaks when refocusing is needed; Stand in proximity to student to focus attention; Establish and maintain eye contact when giving oral directions; Refocusing and redirection; Communicate with supportive personnel; Present alternatives to negative

behavior; Minimize negative behavior; Develop signal for when break is needed; Give student choices to allow control; and Provide positive reinforcement. (J-1; P-1.)

The “Needs—Academic, Developmental, Functional and any other Needs that result from the Student’s Disability and Special Considerations” section (Needs Section) of the June IEP and December IEP reflects the following:

Speech/Language

[J.W.] will require speech and language services that will focus on developing his receptive and expressive language skills.

Other

All classroom instructional strategies are derived from the philosophy of Applied Behavior Analysis (ABA). ABA is the science of learning and is based on research that shows that all behavior, including communication, academics, social, and life skills can be taught through the application of scientifically validated methods. Research has shown that children are more likely to repeat behaviors or responses that are reinforced, and less likely to continue behaviors that are not rewarded. As such, the principle of reinforcement is a cornerstone of all classroom instructional strategies. The implementation of additional instructional strategies will be determined for [J.W.] on an ongoing basis throughout the school year. Individual instructional strategy decisions will be informed by [J.W.’s] responses to interventions. The teaching strategies employed may include but are not limited to errorless learning, prompt-fading, natural environment teaching, discrete trial teaching, task analysis, chaining, shaping, visual scheduled, and peer modeling. Teaching strategies will be implemented, analyzed, and modified to support continual progress as needed for [J.W.].

While some students demonstrate behavior that is compatible with learning, it is understood that this is an evolving area and that at any time, behaviors may escalate and a plan for addressing these events is needed. Data will be collected and analyzed for the maintaining variables for any persistent behavior that may interfere with learning. The function will be determined and will inform strategies for increasing replacement behaviors and reducing behaviors that are incompatible with learning.

Social/Emotional/Behavioral

[J.W.] would benefit from a well-structured learning environment that is carefully planned and consistently implemented in terms of the physical arrangement, schedule of activities, and expected behaviors. [J.W.'s] teachers may wish to use behavioral techniques, such as a motivation board or incentive system to keep him on task by reinforcing target behaviors, such [as] his attending and participation. [J.W.] could be assisted by others who model socially appropriate behaviors, such as initiating a conversation, maintaining appropriate eye contact, and body distancing during conversations. It is important that adults model behavior that is similar to other children [J.W.'s] age. Teachers, other adults, and family are encouraged to engage [J.W.] in social communication as often as possible.

[P-1; J-1.]

There are no goals and objectives relative to elopement or escape in the June IEP or December IEP. The June IEP and December IEP reflect J.W.'s supplementary aides and services as: prompting, cueing and redirecting student participation; reinforcing of personal, social, behavioral, and academic learning goals; positive reinforcement plan; shared assistant (3:1 ratio); 3:1 student to staff ratio. (P-1; J-1.)

A psychological assessment was performed by Tia LaBruno on June 4, 2019, June 5, 2019, and June 10, 2019, and she prepared a Confidential Psychological Assessment, dated June 14, 2019. (J-3.) At that time J.W.'s eligibility category for special education was "preschool child with a disability," and per his IEP, his program placement was in the preschool disabilities full-day class, and he received speech-language therapy and occupational therapy, and had a shared assistant. With regard to testing observations, LaBruno's report reflects that "[J.W.] came willingly with the examiner from his classroom and did not engage in any resistive or challenging behavior when going to the testing site"; he "walked appropriately" with her and "did not evidence any gross motor deficits or clumsy movements"; when he entered the testing room he immediately went over to the window "and engaged in a few instances of non-compliant behavior" when asked to sit at the table because he wanted to look out the window; he did not present with any fidget behavior or hyperactivity during testing; and he "sat appropriately at the testing table, with only one instance in which he attempted to escape from sitting at the table." (J-3.)

Although LaBruno's report reflects that J.W. was significantly disengaged and unresponsive, it does not note any elopement or escape behavior beyond "escape from sitting at the table." (J-3.)

Melanie Hostetter performed a speech and language evaluation of J.W. on May 2, 2019, May 7, 2019, May 9, 2019, May 14, 2019, May 16, 2019, May 21, 2019, May 23, 2019, and May 28, 2019, and she prepared a Speech and Language Evaluation, dated June 3, 2019. (J-5.) Hostetter's report reflects that J.W. accompanied her "without any issues"; that "[w]hile he listened well and was cooperative, reinforcements of desirable objects were used to provide breaks and ensure cooperation"; and when more difficult requests were made involving objects, he "often would attempt to throw the objects." (J-5.)

Valerie Pessirilo, OTR, performed an occupational therapy reevaluation on May 13, 2019, and prepared an undated Occupational Therapy Services Re-Evaluation. (J-6.) Several areas of concern were identified by evaluations, including school interaction skills, sensorimotor readiness/gross motor, classroom work skills, handwriting, academic instruction, materials management, and school daily-living tasks. With regard to his school interacting skills, Pessirilo's report reflects that

[J.W.] had difficulty transitioning with the therapist from the gym to his classroom, possibly because he was unfamiliar with the evaluating therapist. When presented with a preferred item (iPad), he transitioned easily to his classroom. Once entering the classroom with the therapist, [J.W.] went immediately to sit down and play with the iPad. After a few minutes playing with the iPad, the therapist encouraged [J.W.] to participate in some play activities. It was difficult for [J.W.] to switch the focus to the therapist and engage in a variety of presented activities. [J.W.] would not remain with the therapist and wandered around the classroom. He frequently ran away from the table, and threw toys and play materials across the room. He climbed onto and stood on top of the lunch table. He started opening other student's lunches. He would not get off the table when asked, and needed to be physically removed from the table for his own safety. Once his classmates arrived for lunch, he immediately followed the lunchtime routine and followed directions to wash his hands and sit down with others to eat. Ms. Principe states that [J.W.]

occasionally presents defiance/escape behaviors including flapping and screaming, and occasional unwillingness to participate in tabletop activities. [J.W.] has multiple skills but will not always demonstrate them upon request. Ms. Principe reports that in the classroom, [J.W.] establishes and maintains eye contact with others, maintains attention to task, manages changes in his daily routine, takes turns, displays impulse control, and engages in group activities. [J.W.] has difficulty with frustration tolerance, responding to authority figures, and interpersonal awareness. [J.W.] displays a fair ability to manage transitions between activities and getting along with peers. Ms. Principe also states that [J.W.] provides a strong social commentary on the activities he is participating in.

[J-6.]

With regard to sensorimotor readiness/gross motor, Pessirilo's report reflects that she was "unable to assess [J.W.'s] fine motor strength and coordination with resistive manipulatives due to his refusal and escaping behaviors," and that when she attempted one of the standardized tests he "threw the testing materials across the room and threw himself to the floor multiple times." (J-6.) Her report also reflects that "Ms. Principe states that [J.W.] is able to remain seated in his chair or on the floor during structured classroom activities, and maintains attention to task." (J-6.) She summarized that he "displayed limited participation and direction following"; that she was unable to administer a standardized test due to "non-compliant behaviors during the evaluation"; that he presented with "escape/avoidance/defiance behaviors and decreased sensory regulation during the individual assessment portion of the evaluation, but these behaviors quickly diminished once his classmates and school staff entered the room where the evaluation was taking place"; and that he "has difficulty with self-regulation during unstructured and unfamiliar activities," which "presents itself as difficulty remaining seated, avoidance/escape/and defiant behaviors, and self-soothing behaviors." (J-6.)

J.W. was previously enrolled in the Catapult Learning aftercare program, and on September 12, 2019, he commenced attendance at the program for the 2019–2020 school year. (P-12.) On October 2, 2019, Mom emailed Lindsay Morales at Catapult Learning, stating that she had been informed by J.W.'s teacher that Catapult Learning had advised her that J.W. could no longer attend aftercare, and asking what was going

on. On October 4, 2019, Morales responded that previous concerns had been brought to her attention that would disqualify J.W. from the program, but Morales' supervisor suggested keeping an additional person in the classroom to accommodate J.W. On October 6, 2019, Mom responded and asked what the concerns were that he was almost disqualified. On October 7, 2019, Angela Amatrucola of Catapult Learning emailed Mom, in pertinent part, as follows:

The staff . . . have been very concerned that [J.W.] has tried to leave the classroom during our program hours. As you know, our classroom sizes to staff ratio are much larger than [J.W.'s] regular school day classroom. We currently have to follow a staff ratio of 20 students per two adults as per the Office of Childcare Licensing. This difficulty of [J.W.] trying to leave the classroom, is a concern for his safety as well as the other children in the classroom. The leaving of the classroom would qualify him for removal from the program. It would be a safety concern for the child.

We will continue to work with [J.W.] over the next few weeks about remaining in the classroom. As well as provide you with documentation if the behavior continues. We will add an additional staff member to assist in the classroom. I will meet with my Site Supervisor . . . toward the end of the month to see if the behavior has improved.

[P-12.]

J.W.'s attendance record reflects that during the 2019–2020 school year, he was absent fifteen times and tardy four times. (J-7.)

Vanessa Correia has been employed by the District since September 16, 2019, as a speech-language pathologist for kindergarten through eighth grade. She began working with J.W. at the end of September 2019, initially in his classroom and later in the speech room.

Testimony

Michael Rijo

Safety is the primary concern with transportation of students. Property damage is a secondary concern. Certain areas are avoided as stops due to safety hazards, and traffic conditions and speed limits are taken into consideration. Stops are relocated to the nearest safest zone. For dead-end streets, students are picked up/dropped off at the corner because a bus—even a short bus—cannot safely negotiate a turn on a dead-end, nor can it safely back out of a dead-end.

Special Services generates a request in the ticket system that is reviewed by Transportation, and the Transportation Department routes it accordingly. Requests contain full details, so if a special-needs student required a home stop, Rijo would be advised and the District would provide a home stop. J.W.'s stop was designated at the corner of his street. The bus that had in previous years picked up and dropped off J.W. at home was a contractor. Rijo was not aware that the contractor was entering the dead-end street. When the route changed from contractor to District driver, the District driver would not enter the dead-end. The District bus drivers are governed by the Commercial Driver License Manual.

Vanessa Correia

J.W. initially had some behaviors that affected his speech-therapy services and progress, such as silly behavior and difficulty following directions. She first conducted sessions with J.W. inside his classroom because she was unfamiliar to him and he would not interact with her all the time. After building a rapport with him, sessions gradually moved to the speech room. Initially, he sometimes had difficulty transitioning to the speech room. At times when they arrived in front of the speech room, he would flop to the floor. So Correia would utilize a toy to engage him and provide positive reinforcement. At times it was just thirty seconds to a minute and then he was able to enter the speech room, and once inside there were no further difficulties with that specific behavior. J.W.'s behaviors had improved from September 2019 to December 2019, which allowed her to

observe his true speech and language abilities. He transitioned easily to the speech room, was able to sit for a longer period of time with her, was able to attend to many of the tasks for a longer period of time, and achieved answering questions with a model and questions with a verbal cue. J.W. was making progress on his speech and language goals and had made progress toward his goals by the time progress reports went out in November 2019.

Correia sent out weekly or biweekly reports to the parents. At the December 2019 IEP meeting, the parents asked that she specify the questions being worked on in her reports. Between December 2019 and March 2020, the parents did not have any specific questions, comments, or concerns regarding the weekly reports. The parents expressed a concern about answering “yes” and “no” questions, so she assured them that would be a focus in therapy. The parents noted difficulty with J.W.’s spontaneous language at home, and Correia advised that he does benefit from prompts and cues to increase his verbal utterances, but that he has produced spontaneous language with her, just not quite as frequently. She provided the parents with some strategies in the weekly reports. By March 2020 J.W. could answer “where” and “who” questions, and moving forward she would work on independence in answering those questions by decreasing the cues. With respect to his goals, he was able to produce three- to four-word sentences with verbal prompts or models. Social pragmatic is difficult for children with autism, but he made a lot of progress in that area and can verbally interact with his peers given verbal cues or prompting. He was making meaningful progress on his goals and objectives.

Nancy Morales-Frigoletto

Morales-Frigoletto has been employed by the District since 2006, as an elementary-school teacher until 2015, and thereafter as a school psychologist until April 2019, when she became supervisor of Special Services. She possesses a teacher certification, school psychologist certification, and supervisor certification. An IEP meeting was held in December as a result of the Department’s complaint investigation. J.W.’s IEP does not reflect behavioral issues that would require specialized transportation.

Diana Pinto-Gomez

Pinto-Gomez is the director of Special Services. The District made an offer to have the district BCBA, who works with J.W. at school weekly, go to the home and help get J.W. to the corner. The offer was made because the parents stated they were having difficulty getting J.W. to the bus stop, and Mom stated that she had to put him in the car. The parents wanted their own BCBA, but the District wanted its BCBA because it was for an educational setting, and to get data and provide strategies.

S.W. (Mom)

While J.W. was in preschool, Mom had to dress him for school, give him breakfast, and get him ready for the bus. She had to do everything for him, and it required a lot of coaxing and reinforcers to get him to comply and be ready when the bus arrived. When the bus arrived, she walked J.W. out to the driveway holding his hand and put him on the bus. She did not leave him alone. Since 2017 he has primarily taken the bus to school.

J.W.'s behaviors continued to impact his daily activities in kindergarten. If he is not in the mood or does not feel up to doing something, he will not do it. He must be coaxed with reinforcers. Some of his negative behaviors are running away, flopping to the floor and stiffening up, throwing things, putting his hands in his mouth, and climbing on or pushing chairs and tables. She has observed these behaviors at home and at school. After he flops to the floor, if she picks him up or gets him to stand up and does not hold him, he tries to run away. Sometimes she just allows him to be on the floor until he calms down a little and he stands up or she picks him up. If walking outside, she always holds his hand. He cannot walk by himself next to her because most times he would run off.

When he was enrolled in and evaluated by the District, she was told he would receive door-to-door busing service, and it was in the IEP. She did not ask the District to provide that service. Her understanding was that the bus picked him up at their home due to his autism. She was never advised that he will get door-to-door services because of this or that. She was surprised it was offered, and gladly accepted because it was

going to be a great help for her. Prior to September 2019 there were no discussions at IEP meetings regarding transportation, because there was no need, as he was receiving that service already. He was transported by yellow short bus without incident for two years. The June 2019 IEP reflected the same door-to-door transportation as the prior years' IEPs. There was no discussion about transportation at the June IEP meeting. She did not mention her struggles in getting J.W. ready for school and onto the bus to the child study team (CST) during the June 2019 IEP meeting. The only reason she came to understand why the District was not providing door-to-door was because it was sending a long bus instead of a short bus.

J.W. did not take the bus on the first day of the 2019–2020 school year, because the bus failed to show at their home. She called the Transportation Department but was left on hold for twenty to twenty-five minutes, so she hung up. The following day the bus again failed to show. She called the Transportation Department, but she was left on hold for thirty minutes, so she hung up. She sent an email to notify the school that the bus did not show up again. The first response that she received was from Pinto-Gomez, stating that door-to-door had been updated, but S.W. did not understand what that meant. The bus failed to show on Monday. She came to understand by Tuesday that the bus was coming to the corner at 7:30 a.m., so she went to the corner in her car at 7:30 a.m. and a bus was there, but it was not J.W.'s bus, so she still did not know what was going on. Within the second week, their advocate became involved. She saw an email about a computer glitch and an email about the family having moved, but they had not. There were a few days J.W. was absent from school because she was working and in flux. She started dropping him off at school, but she was dropping him off late because she was trying to work out something with her job. It was easier for her to drop him off around 9:00 a.m. so someone could come out and get him and she could leave. J.W. started taking the bus from the corner on or about September 25, 2019.

Getting J.W. up and dressed in the morning is always a struggle, with lots of coaxing and the iPad to get him to do stuff. He needs the iPad to get him to walk downstairs, out of the house, or into the car. One morning she decided to walk to the bus stop, but they did not even get out of the driveway before he flopped to the ground. So, she had to drive him to the bus stop and wait on the corner in the car. When she sees

the bus turn the corner, she gets his rolling school bag out of the car first and then tries to get J.W. out of the car. He still must have the iPad to get him out of the car. She must hold his hand and hold the bag, while he is holding his iPad, to get him on the bus when it stops. The aide takes the bag first and places it by J.W.'s seat while Mom puts J.W. on the bus platform. Once he is on the platform, the aide holds his hand to get him to his seat, and Mom takes his iPad. Most mornings he is screaming bloody murder when he's seated on the bus. She attempted to walk him to the bus stop twice and it was a failure. He would not walk and flopped to the ground both times. If she does not have the iPad, she cannot even get him down the stairs, even when the bus came to their home. She would not feel comfortable standing with J.W. at the bus stop without the iPad because it would just be a disaster. J.W. would flop to the ground and could possibly get away from her. If she was not holding his hand he would get hit by a car. It is just not doable. Due to his disability he is not aware of danger, so she always holds his hand for safety reasons. To this day, when they are out they must hold J.W.'s hand because he tends to run off. His flopping to the floor and having his hand in his mouth have decreased.

Mom handles J.W.'s mornings and Dad handles J.W.'s afternoons. In September 2019, J.W. missed approximately six or seven days of school and was tardy three or four times because the bus stop was at the corner and not at their door. One morning when she brought him to school late, the assistant came by security to get him but did not hold his hand, and he ran away from her toward the stairs. The aide was not able to catch up with him, so Mom ran behind him and took him by the hand. Mom asked the assistant if she wanted her to walk him to his classroom, but the assistant declined and took him by the hand, and he walked to the classroom with the assistant.

At the start of the December 17, 2019, IEP meeting they were provided with an IEP that already stated "station" instead of door-to-door. There was no discussion about transportation. They were just told it would be "station," and the meeting moved on to educational matters. She did not agree to the change in transportation and did not sign the December IEP. She has never agreed to or signed any of J.W.'s IEPs, so they just went into effect after the fifteen-day period.

Between September 2019 and March 2020, she observed J.W. at school three times. In October, she observed via the observation window, with J.W. unaware of their presence, for a full class period. He made snow angels on the floor, flopped to the floor, and crawled on the floor. An aide tried to get him to sit down and he crawled away from her. He climbed on the windowsill and tabletops. He was in the bathroom for ten minutes. She concluded that that teacher and aide could not control him. She was not surprised by his behavior but was surprised by its duration. She again observed him on Parents' Day in November. J.W. was able to see her in the classroom and his behavior was basically the same as during her prior observation. He tried to climb on the windowsill and tabletops, he crawled on the floor, and his hand was in his mouth. She told him several times to get up off the floor. When it was time to go to the bathroom he ran away from the aide and Mom had to take him to the bathroom. She again observed him in March 2020 in music class, which was with general-education students not in his classroom. She and J.W. exchanged hellos, but he was doing everything besides music. He ran around the back of the class, tried to climb a bookshelf, and crawled on the floor.

Every year she has received a letter from the Transportation Department over the summer with J.W.'s name, school, bus times, and stop location on the corner. However, the prior two years the bus came to her home. She did not contact anyone from the District relative to the bus-stop letters before September 6, 2019. Since on or about September 25, 2019, he took the bus at the corner almost every day for the 2019–2020 school year. He was attending regularly and missed a few days for personal reasons. J.W. was able to attend school regularly in 2019–2020 because she took it upon herself to put him in the car and escort him to the bus stop. After some difficulties with the bus situation in September 2019, she had to get her bearings on how to get him to school to avoid truancy.

For the period he attended aftercare, he took the bus in the morning and Dad picked him up in the afternoon, except for a few days when Mom was home and instructed his teacher to put him on the bus and she would pick him up at the corner in her car. There were no incidents taking the bus home. Mom was not sure if J.W. attended aftercare five days per week during September 2019 to December 2019. J.W. stopped attending aftercare in December 2019 because S.W.'s work situation had changed, and

she was home in the afternoon. From January 2020 until school physically closed in March 2020, J.W. went home on the bus.

With regard to discussions about transportation, she was aware that the District advised that J.W. could be dropped off earlier and there would be someone there to receive him, and that the District offered to pay S.W. to drive him to school one way. She denied being aware that the District offered to send a BCBA to her home to help with J.W.'s behaviors and get him to the bus stop.

J.W. (Dad)

The width of the street is sufficient to still allow two-way traffic with cars parked on both sides of the street. When asked "Why do you think that you needed the transportation that you weren't getting?", Dad's response was, "Well, this is what we were getting for the previous years that [J.W.] has been in the Elizabeth School District. It's evident the reason why he needed it and without him having it it's a big hassle." He needs door-to-door because of his behavior. He was getting door-to-door and that worked out for them as far as his behavior. Once they realized he was not getting door-to-door and that the bus was coming to the corner, it was a hassle trying to get him to go to the bus stop. J.W. would try to run away. J.W. would try to flop to the floor. It is way too dangerous to try to walk him to the bus stop.

He has tried to take J.W. for a walk in his neighborhood. He typically holds J.W.'s hand because J.W. would run and potentially get hit by a car. J.W. does not have awareness. They constantly must remind him that there are other people and objects around. He is not aware of risks posed by cars. When Dad picks J.W. up at aftercare, someone walks out with J.W. holding his hand, or he would elope. Even while holding his hand he has flopped to the floor before.

Christina Allen

Allen works with J.W. mainly to make sure he is behaving appropriately, able to request without engaging in problem behaviors, and able to ask for what he wants and

needs without grabbing, pushing, or running away. She also works with J.W. on functioning skills, especially toileting, and language and play skills. She sees J.W. on average once a week for two hours. Allen also supervises the behavior techs who work with him more frequently on the plan and goals Allen developed.

Allen has tracked J.W.'s non-compliant behaviors since July 2018. There are times when J.W. will not respond despite previously having been observed to be able to complete the skills, times when he has flopped to the floor, and times when he has tried to leave the area where they are placing the demands or working with him. The techs have changed several times since July 2018. He displays non-compliant behaviors more often with someone new. With someone he is familiar with, non-compliant behaviors are inconsistent.

Presently, Correia is working with him on requesting missing items; answering "yes" and "no" questions to help communicate and understand; answering "wh" questions; working on playing appropriately; requesting general items that he wants with three- to four-word sentences; and labeling actions. Between September 2019 and December 2019 Correia had not taken J.W. out into the neighborhood. His sessions were in the evening, and toileting was a major concern, and they were working on getting him to be compliant in the home and through his programming. The toileting program required taking him to the bathroom every fifteen to thirty minutes, so they were not at the point yet to bring him into the community. From December 2019 to March 2020 they had not taken him out into the community for the same reason.

In general, Correia would have concerns about taking J.W. out into the community because all children with an autism diagnosis may have limited safety awareness. She would want to prove certain skills with data and a certain criterion, such as 80 percent over three consecutive sessions, before she would feel comfortable making safe goals out in the community. She did not think it would be safe, and/or it would be very difficult for the family, given J.W.'s behavioral inconsistency, to get him to the bus stop in a timely manner. Safety in general was a concern, and she did not feel comfortable without taking data and running specific goals to prove that he could walk to the corner. Cars and other people can be a distraction. J.W. did not consistently respond to his name. She would

like to do an observation, anecdotal walking with a parent, to see if he is aware of the curb, sidewalk, or a stop sign, how many steps he could take before engaging in problem behavior, if he responds to “stop” or his name, or how long he could wait. The parents have said that it is a concern. She did not think the parents ever really felt safe out in the community. She is not saying it would never be appropriate for him to take the bus at the corner, but no data had been collected to demonstrate that it is safe.

She was aware the parents tried to walk him at least once to the bus stop. The parents told her that he was non-compliant. The parents did not ask her for assistance with or strategies for the bus stop, which she would have provided if asked. She worked with J.W. on other things and had not yet gotten to outdoor skills. His inside compliance had not been mastered, and she prefers mastery in one setting before adding another setting. She was not aware of any school attendance problem. She knew that he was getting on the bus daily at the corner, but it was done in a way that the parents did not want to do it—having to drive him. She did not know the District had offered to send a BCBA to the house for that purpose, and thought that would be helpful. She opined that J.W. would be able to get from home to the bus stop with one of his parents with the assistance of a BCBA, but that it would take time and not be a one-day fix. She never spoke to anyone in the District about J.W.’s behavior or safety concerns.

LEGAL ANALYSIS AND CONCLUSIONS

The Individuals with Disabilities Education Act (IDEA), 20 U.S.C. §§ 1400–1482, ensures that all children with disabilities have available to them a free appropriate public education that emphasizes special education and related services designed to meet their unique needs and prepare them for further education, employment, and independent living, and ensures that the rights of children with disabilities and parents of such children are protected. 20 U.S.C. § 1400(d)(1)(A), (B); N.J.A.C. 6A:14-1.1. A “child with a disability” means a child with intellectual disabilities, hearing impairments (including deafness), speech or language impairments, visual impairments (including blindness), serious emotional disturbance, orthopedic impairments, autism, traumatic brain injury, other health impairments, or specific learning disabilities, and who, by reason thereof,

needs special education and related services. 20 U.S.C. § 1401(3)(A). There is no dispute that J.W. has an autism-spectrum-disorder diagnosis.

States qualifying for federal funds under the IDEA must assure all children with disabilities the right to a free “appropriate public education.” 20 U.S.C. § 1412(a)(1); Hendrick Hudson Cent. Sch. Dist. Bd. of Educ. v. Rowley, 458 U.S. 176 (1982). Each district board of education is responsible for providing a system of free, appropriate special education and related services. N.J.A.C. 6A:14-1.1(d). A “free appropriate public education” (FAPE) means special education and related services that (A) have been provided at public expense, under public supervision and direction, and without charge; (B) meet the standards of the state educational agency; (C) include an appropriate preschool, elementary-school, or secondary-school education in the state involved; and (D) are provided in conformity with the individualized education program required under 20 U.S.C. § 1414(d). 20 U.S.C. § 1401(9); Rowley, 458 U.S. 176. Subject to certain limitations, FAPE is available to all children with disabilities residing in the state between the ages of three and twenty-one, inclusive. 20 U.S.C. § 1412(a)(1)(A), (B).

An individualized education program (IEP) is a written statement for each child with a disability that is developed, reviewed, and revised in accordance with 20 U.S.C. § 1414(d); 20 U.S.C. § 1401(14); 20 U.S.C. § 1412(a)(4). When a student is determined to be eligible for special education, an IEP must be developed to establish the rationale for the student’s educational placement and to serve as a basis for program implementation. N.J.A.C. 6A:14-1.3, -3.7. At the beginning of each school year, the district must have an IEP in effect for every student who is receiving special education and related services from the district. N.J.A.C. 6A:14-3.7(a)(1). Annually, or more often, if necessary, the IEP team must meet to review and revise the IEP and determine placement. N.J.A.C. 6A:14-3.7(i). FAPE requires that the education offered to the child must be sufficient to “confer some educational benefit upon the handicapped child,” but it does not require that the school district maximize the potential of disabled students commensurate with the opportunity provided to non-disabled students. Rowley, 458 U.S. at 200. Hence, a satisfactory IEP must provide “significant learning” and confer “meaningful benefit.” T.R. v. Kingwood Twp. Bd. of Educ., 205 F.3d 572, 577–78 (3d Cir. 2000).

The Supreme Court discussed Rowley in Endrew F. v. Douglas County School District RE-1, __ U.S. __, 137 S. Ct. 988 (2017), noting that Rowley did not “establish any one test for determining the adequacy of educational benefits,” and concluding that the “adequacy of a given IEP turns on the unique circumstances of the child for whom it was created.” Id. at 996, 1001. Endrew F. warns against courts substituting their own notions of sound education policy for those of school authorities, and notes that deference is based upon application of expertise and the exercise of judgment by those authorities. Id. at 1001. However, the school authorities are expected to offer “a cogent and responsive explanation for their decisions that shows the IEP is reasonably calculated to enable the child to make progress appropriate in light of his circumstances.” Id. at 1002.

The petitioners allege, inter alia, that the District denied J.W. a FAPE by failing to provide him with “door-to-door” transportation; that the District “was aware that [J.W.] was an elopement risk,” and required ‘door-to-door’ transportation to ensure that he arrives to school safely; and that the District failed to provide [J.W.] with the twice daily ‘door-to-door’ transportation services pursuant to his June 21, 2019 IEP” that “would have provided [J.W.] with access to an education at [his school].” Petitioners seek an order maintaining the “twice daily door-to-door” transportation services provided in the currently operative IEP from June 21, 2019,¹ and providing compensatory education.

Petitioners are not challenging the education services provided after J.W. arrives at school or leaves school, and the due-process petition makes no allegations relative to academic progress. The entirety of this controversy relates to petitioners’ allegation that the District did not provide J.W. with a FAPE because the transportation was not to and from J.W.’s home, but instead was to and from a bus stop at the corner of their street. The District contends that it provided a FAPE to J.W. because it provided him with transportation to and from school, and he was making meaningful progress in school.

¹ The due-process petition was filed on January 2, 2020—sixteen days after the December 17, 2019, IEP. While technically exceeding the fifteen days, it is noted that January 1, 2020 (New Year’s Day) was a holiday and the untimeliness is de minimis. Thus, the “currently operative IEP” would have been the June 21, 2019, IEP.

The district bears the burden of proof and the burden of production whenever a due-process hearing is held pursuant to the provisions of the IDEA. N.J.S.A. 18A:46-1.1.

The summary of special-education programs and related services in the June IEP reflected transportation as: “Special Transportation: Door to Door Transportation,” and it is undisputed that the Department directed the District to “invite the parent to an IEP meeting for the purpose of conducting further discussions regarding transportation, as a related service, for the student and implementing any mutually agreed upon accommodations.” An IEP meeting was held in December 2019, but the parents maintained that “door-to-door”—meaning a home stop and not a corner stop—was required by J.W.’s disability, while the remainder of the CST maintained that a home stop was not required by his disability.

The “Concerns of the Parent” sections in the June 2019 IEP and the December 2019 IEP do not reflect any concerns relative to escape or elopement, and prior to September 2019 there were no CST discussions about transportation requirements. The parents claim that this was because J.W.’s IEPs already reflected “door-to-door” transportation. However, the District sent petitioners a letter every summer designating the street corner and not petitioners’ home as J.W.’s bus stop, and there is no evidence that petitioners contacted the school upon receipt of the first letter—which would have been prior to the contractor bus ever showing up at their home—about a discrepancy between the letter and the IEP. This suggests that there had been no expectation of a “home” stop.

Review of the CDL Manual, Section 10, relative to “School Buses” reflects that Section 10.1 defines the bus danger zones on all sides of the bus, and Section 10.2.1 states that “[e]ach school district establishes official routes and official school bus stops,” which stops “should be approved by the school district prior to making the stop.” Section 10.2.2 and Section 10.2.3 reflect that when all students are accounted for, the driver should prepare to leave by: closing the door, engaging transmission, releasing parking brake, turning off alternating flashing red lights, turning on left-turn signal, checking all mirrors again, allowing congested traffic to disperse, and when it is safe, move the bus, enter the traffic flow, and continue the route. Accordingly, it is evident that “backing” is

not contemplated as the common means of leaving the bus stop. Further, the CDL Manual states, inter alia, at Section 10.7.3:

Backing a school bus is strongly discouraged. You should back your bus only when you have no other safe way to move the vehicle. You should never back a school bus when students are outside of the bus. Backing is dangerous and increases your risk of a collision. If you have no choice and you must back your bus, follow these procedures:

Rijo credibly testified that due to safety concerns the District's policy is never to have a bus stop on a dead-end street, as that would require "backing" the bus. This policy is not unreasonable given the general CDL guidelines for school buses and safety concerns. Further, that the contractor bus may have avoided an accident during the prior two school years is not persuasive in voiding the District's policy.

There is no question that transitions are difficult for children with autism. J.W. did not go to the bus stop until Tuesday, September 10, 2019, so it is not unexpected that he may still have had difficulty with the new stop only three days later when the parents' complaint was filed with the Department of Education. However, there is simply no evidence that door-to-door transportation was specifically discussed, and as a result included as such in the IEP, or evidence that it was required. To the contrary, S.W. testified that she was surprised, but happy, that door-to-door was in the IEP because it would help her out. Further, the evaluations and reports, as well as testimony of the District's witnesses, all reflect that J.W. can handle transitions after routines are established and reinforcers are identified, and his behaviors do not prevent him from being picked up from or dropped off at the corner bus stop. This is supported by the fact that J.W. was transported to school primarily by bus after September 2019 and, irrespective of the reason, was absent a total of only eight or nine times over an approximately five and half month period—even without the assistance of the District's BCBA or the parents' BCBA.

Based upon the testimony and documentary evidence, I **CONCLUDE** that the District's IEPs were appropriate to meet J.W.'s educational needs and provided him with a FAPE.

20 U.S.C. § 1415(f)(3)(E)(ii) provides that in matters alleging a procedural violation, a hearing officer may find that a child did not receive a free appropriate public education only if the procedural inadequacies (I) impeded the child's right to a free appropriate public education; (II) significantly impeded the parents' opportunity to participate in the decision-making process regarding the provision of a free appropriate public education to the parents' child; or (III) caused a deprivation of educational benefits.

Although the IEPs all reflected "door-to-door," the Transportation Department letters all reflected that the bus stop was at the corner. Assuming *arguendo*, for purposes of the due-process petition, that door-to-door means to/from the student's home and not a bus stop, by virtue of "stay put" the District would have been required to transport J.W. to/from his home, rather than a bus stop, pending a final decision on the due-process petition. There is no dispute that J.W. was not transported to/from his home. However, the District provided J.W. with transportation to and from school for the duration of the 2019–2020 in-school school year, and the evidence reflects that J.W. was transported to and from school on the school bus, albeit from the corner bus stop. Thus, J.W. had access to education. Certainly, an at-home bus stop may be preferable for any student, with or without an IEP, but there was no evidence, such as medical evidence, that an at-home stop was required for J.W. to access an appropriate education. Accordingly, I **CONCLUDE** that transportation to and from the corner bus stop rather than from J.W.'s home did not rise to the level of a denial of FAPE, did not significantly impede the parents' opportunity to participate relative to his education, and did not cause a deprivation of educational benefits.

ORDER

Based on the foregoing, it is hereby **ORDERED** that the relief sought by petitioners is **DENIED** and the due-process petition is **DISMISSED**.

This decision is final pursuant to 20 U.S.C. § 1415(i)(1)(A) and 34 C.F.R. § 300.514 (2020) and is appealable by filing a complaint and bringing a civil action either in the Law Division of the Superior Court of New Jersey or in a district court of the United States. 20 U.S.C. § 1415(i)(2); 34 C.F.R. § 300.516 (2020).



February 19, 2021

DATE

mm

KELLY J. KIRK, ALJ

APPENDIX

Witnesses

For Petitioners:

Michael Rijo

Rebecca Wood

Vanessa Correia

Nancy Morales-Frigoletto

For Respondent:

S.W.

J.W.

Christina Allen

Diana Pinto Gomez

Exhibits

Joint

J-1 December 17, 2019, IEP

J-2 (Not in evidence)

J-3 Confidential Psychological Assessment, dated June 14, 2019

J-4 (Not in evidence)

J-5 Speech and Language Evaluation, dated June 3, 2019

J-6 Occupational Therapy Services Re-Evaluation

J-7 Attendance Record

J-8 (Not in evidence)

J-9 (Not in evidence)

J-10 CDL Manual Section 10

J-11 Complaint Investigation Report

J-12 (Not in Evidence)

J-13 Due Process Petition

For Petitioners:

- P-1 June 21, 2019, IEP
- P-2 Complaint
- P-3 (Not in evidence)
- P-4 (Not in evidence)
- P-5 (Not in evidence)
- P-6 (Not in evidence)
- P-7 (Not in evidence)
- P-8 Transportation Emails
- P-9 (Not in evidence)
- P-10 (Not in evidence)
- P-11 (Not in evidence)
- P-12 Catapult Learning Emails
- P-13 Photographs

For Respondent:

None