

New Documents to Encourage Collaboration Between State Agencies, Local Agencies and Head Start

- ▶ [Dear Colleague Letter on Individuals with Disabilities Education Act \(IDEA\) Services in Head Start](#)
 1. IDEA Requirements
 2. Collaboration
 3. Resources
- ▶ [Guidance on Creating an Effective Memorandum of Understanding to Support High Quality Inclusive Early Childhood Systems](#)

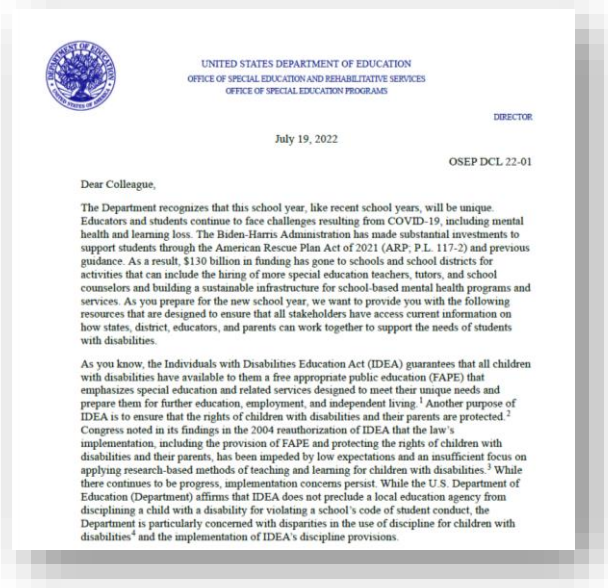


GUIDANCE TO HELP SCHOOLS SUPPORT STUDENTS WITH DISABILITIES AND AVOID DISPARITIES IN THE USE OF DISCIPLINE

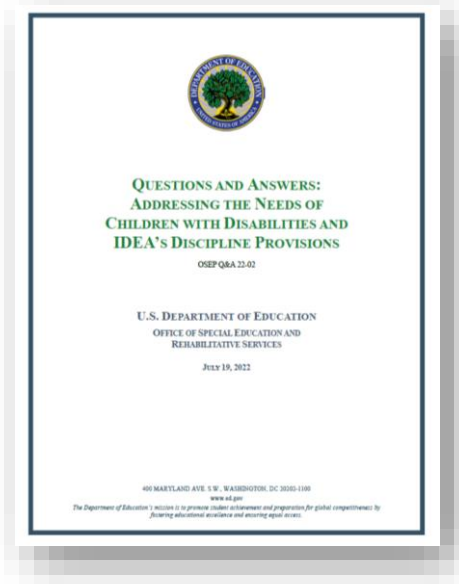
OCTOBER 13, 2022

Agenda

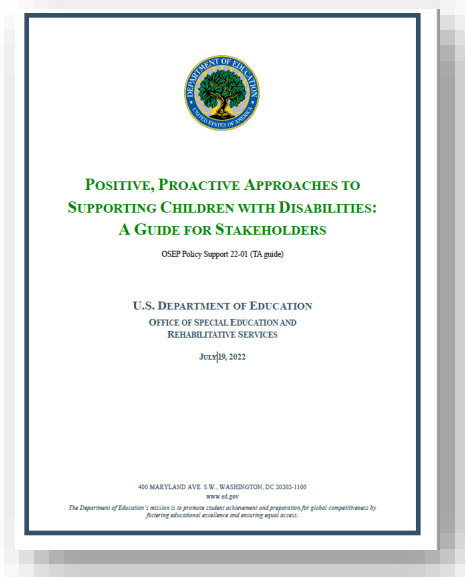
- ▶ Welcome
- ▶ Explore highlights of OSEP's Discipline/Behavior Guidance
- ▶ Provide feedback in the chat
 - How can OSEP support your efforts to implement IDEA's discipline and behavior related requirements?



*OSEP Dear Colleague
Letter on
Implementation of IDEA
Discipline Provisions*



*Questions and Answers
Addressing the Needs of
Children with Disabilities
and IDEA's Discipline
Provisions*



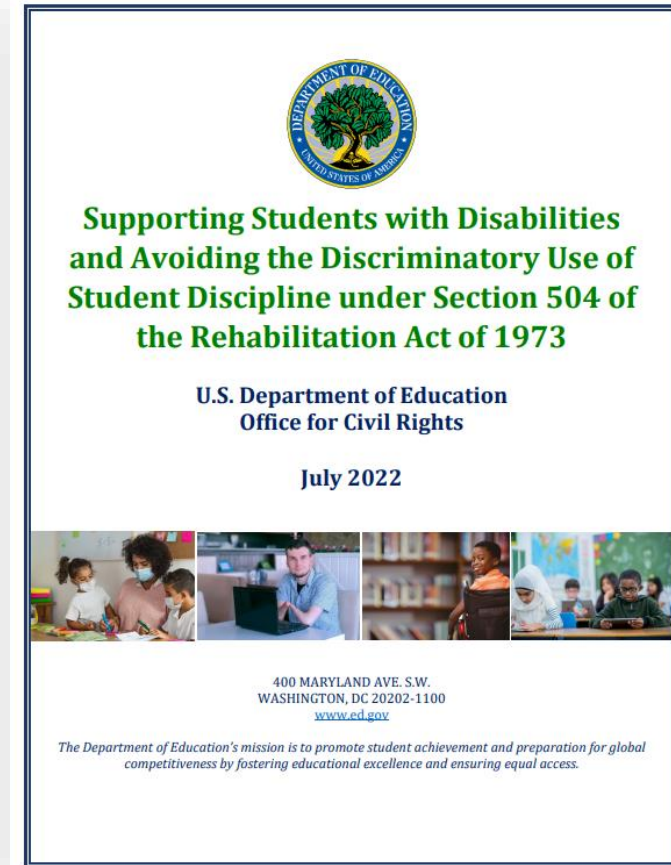
*Positive, Proactive Approaches to
Supporting the Needs of Children
with Disabilities: A Guide for
Stakeholders*

Individuals with Disabilities Education Act (IDEA) Topic Areas



Office of Civil Rights

- U.S. Department of Education/Office for Civil Rights
 - [Supporting Students with Disabilities and Avoiding the Discriminatory Use of Student Discipline under Section 504 of the Rehabilitation Act of 1973 \(Section 504\).](#) (July 19, 2022)
 - [Accompanying Fact Sheet.](#) (July 19, 2022)



Why, What & How

OSEP Guidance to Help Schools Support Students with Disabilities and Avoid Disparities In the Use of Discipline

It's hard to learn when removed from the classroom



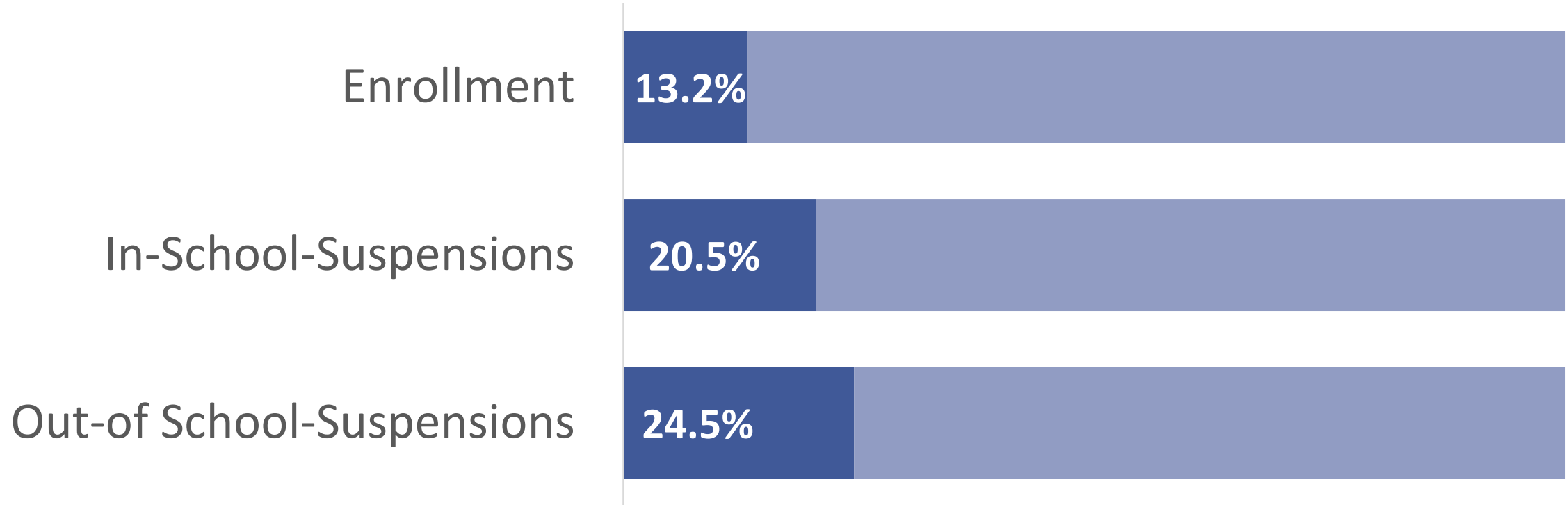
Preschool Students Served Under IDEA in 2017-18 School Year



U.S. Department of Education, Office for Civil Rights. "An Overview of Exclusionary Discipline Practices in Public Schools for the 2017–2018 school year: Civil Rights Data Collection." June 2021. Available at: <https://www2.ed.gov/about/offices/list/ocr/docs/crdc-exclusionary-school-discipline.pdf>



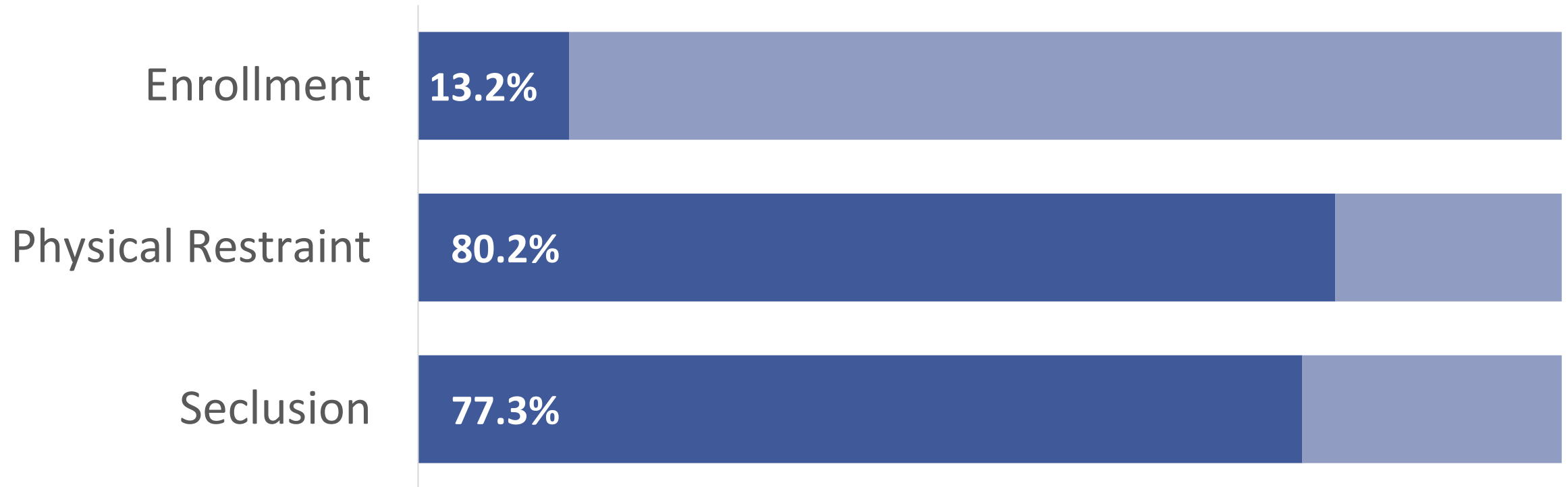
School-age students with disabilities served under IDEA in 2017-18 School Year



U.S. Department of Education, Office for Civil Rights. "An Overview of Exclusionary Discipline Practices in Public Schools for the 2017–2018 school year: Civil Rights Data Collection." June 2021. Available at: <https://www2.ed.gov/about/offices/list/ocr/docs/crdc-exclusionary-school-discipline.pdf>



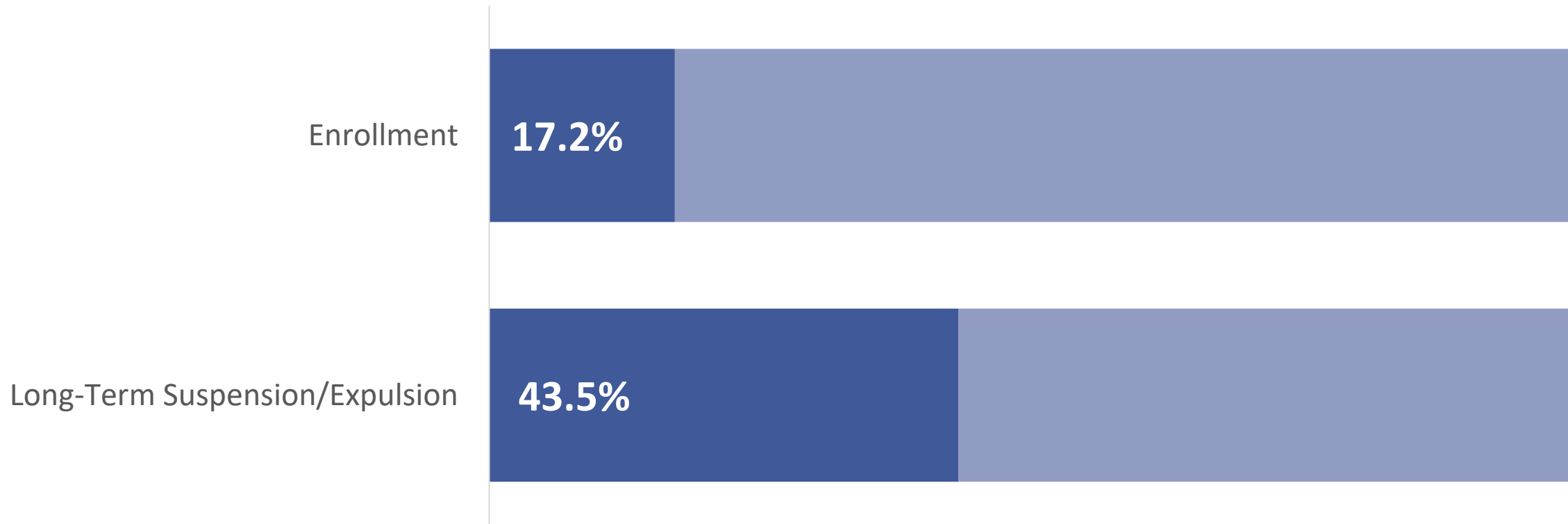
Students with disabilities served under IDEA in 2017-18 school year



U.S. Department of Education, Office for Civil Rights. "An Overview of Exclusionary Discipline Practices in Public Schools for the 2017–2018 school year: Civil Rights Data Collection." June 2021. Available at: <https://www2.ed.gov/about/offices/list/ocr/docs/crdc-exclusionary-school-discipline.pdf>



Black Children with Disabilities in 2019-2020 School Year



U.S. Department of Education, EDFacts Data Warehouse (EDW): "IDEA Part B Child Count and Educational Environments Collection," 2019–20. Available at: <https://data.ed.gov/dataset/idea-section-618-state-part-b-child-count-and-educational-environments/resources>.



SCHOOL DAYS MISSED DUE TO OUT-OF-SCHOOL SUSPENSIONS IN 2017-18



11,205,797

The total number of school days
that all students missed due to
out-of-school suspensions.

Source: U.S. Education Department, Office for Civil Rights, Civil Rights Data Collection, 2017-18 State and National Estimations, released June 2021, available at <https://ocrdata.ed.gov/estimations/2017-2018>.

*This data refers to students with and without disabilities.

“The Department is concerned that misapplying or, in some cases, not applying, the provisions found in IDEA, including the discipline provisions, has contributed to inappropriate exclusion, particularly for children of color with disabilities, and has resulted in denying access to critical educational opportunities.”

Question & Answers: Addressing the Needs of Children with Disabilities
and IDEA’s Discipline Provisions



12 Key Areas Addressed in Q&A

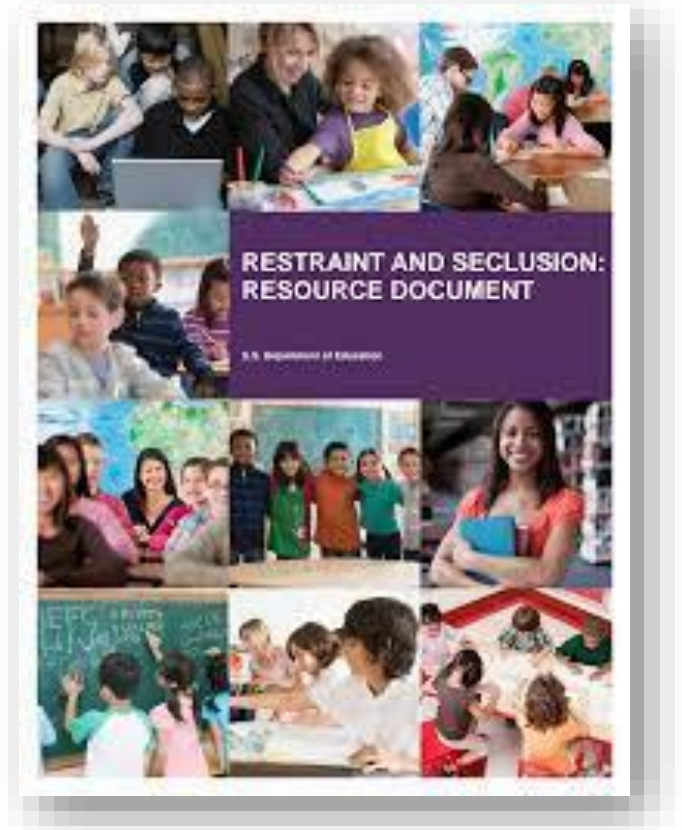
- A. State & Local Public Agency Obligations to Meet the Needs of Children with Disabilities Under IDEA
- B. Overview of IDEA's Discipline Requirements
- C. Change in Placement
- D. Interim Alternative Educational Settings
- E. Special Circumstances
- F. Manifestation Determination Review
- G. Functional Behavioral Assessments and Behavior Intervention Plans
- H. Provision of Services During Periods of Removals
- I. Protections for Children Not Yet Determined Eligible for IDEA Services
- J. Application of IDEA Discipline Protections in Certain Specific Circumstances
- K. Resolving Disagreements
- L. State Oversight & Data Reporting Responsibilities
- * Glossary of Key Terms

Describing Discipline

- ▶ IDEA does not define “discipline.” For the purposes of the Q&A document, “discipline is intended to mean:
 - the consequences a school imposes on a child who violates a school’s code of student conduct or rules as determined by school personnel and does not include use of corporal punishment. (B-1)

Describing Discipline

- ▶ Restraint or seclusion is **not** an appropriate discipline strategy and should only be used in situations where the child's behavior poses imminent danger of serious physical harm to themselves or others.
- Every effort should be made to prevent the need for the use of restraint and seclusion. (B-3)



[Restraint and Seclusion:
Resource Document. \(PDF\)](#)

Overview of IDEA Discipline Requirements

- ▶ IDEA explains the rights of children with disabilities and the authority of school personnel when a child is suspended, expelled or temporarily placed in an interim alternative educational setting for disciplinary purposes under 34 C.F.R. §§300.530 through 300.536. (B-1)
- ▶ IDEA does not prescribe specific disciplinary actions an LEA must take but it *does* set some limits. (B-2)

Application of IDEA Discipline Protections

- ▶ Children who are receiving FAPE under IDEA
- ▶ Publicly funded preschool programs
- ▶ Public charter schools
- ▶ SEA, LEA virtual schools / virtual setting
- ▶ Correctional facilities
- ▶ Publicly placed private school students for providing FAPE
- ▶ Parent consented to some but not all special education services
- ▶ Child not yet determined IDEA eligible, but LEA is deemed to have knowledge that the child is a child with a disability (Sections I, J)



Behavior is a form of communication



Addressing Behavior

- ▶ IEP Teams must **recognize and support the behavioral needs** of children with disabilities through the evaluation, reevaluation, IEP development/implementation process. (A-2)
- ▶ To ensure FAPE to the child, IEP Teams must consider the **use of positive behavioral interventions and supports**, and other strategies if a child's behavior impedes their learning or that of others.
 - If an IEP Team does not consider behavioral supports for a child with a disability, it **may result in a denial of FAPE** and/or the **overreliance on and misuse of exclusionary discipline** in response to a child's behavior.

Addressing Behavior

- ▶ If a child's IEP does not include positive behavioral interventions and supports, and other strategies, the **IEP Team should convene** and consider revising the IEP or conducting assessments, if additional data is needed. (A-3, A-4, A-5)
- ▶ IEP Teams should revise a child's IEP if existing behavioral supports are not effective in addressing a child's behavior needs. (A-6)

► Description of an FBA:

- *An FBA is used to understand the function and purpose of a child's specific, interfering behavior and factors that contribute to the behavior's occurrence and non-occurrence for the purpose of developing effective positive behavioral interventions, supports, and other strategies to mitigate or eliminate the interfering behavior.*
(Glossary)



- Must be conducted after a manifestation determination review concludes the child's behavior that resulted in the disciplinary change of placement was a manifestation of the child's disability. (G-1)
- May be conducted in other circumstances as well.

- ▶ Behavioral intervention plans (BIP) take an individualized, proactive, and preventative approach to addressing the interfering behavior.
- ▶ BIPs must be implemented when the child's conduct that resulted in a change of placement was a manifestation of the child's disability because the conduct was caused by, or had a direct and substantial relationship to, their disability, or the conduct was a direct result of the LEA's failure to implement the IEP.
- ▶ If the LEA already conducted an FBA and developed a BIP before the change of placement occurred, the IEP Team must review the BIP and modify it as necessary to address the behavior. (G-1)

Manifestation Determination Review

- ▶ A manifestation determination review is a review conducted by the LEA, the parent, and relevant members of the IEP Team (as determined by the parent and the LEA) of all relevant information in the child's file to determine if the conduct that gave rise to the violation of the school's code of student conduct was:
 - caused by, or had a direct and substantial relationship to, the child's disability, or
 - if the behavior in question was the direct result of the LEA's failure to implement the IEP. (F-1)

Manifestation Determination Review

What is an MDR?

When Must MDR be Conducted?

When must a child's behavior be determined to be a manifestation of their disability?

What actions must the IEP Team take if they determine the behavior IS a manifestation?

What actions must the IEP Team take if they determine the behavior is NOT a manifestation?



Exclusionary discipline is overused



Examples of School/Early Childhood Program Discipline



In-School or
Out-of-School
Suspension



Expulsion



Removal to
Interim
Alternative
Educational
Setting



“Shortened
day” or
Informal
Removal

Generally, a removal is considered a disciplinary removal unless:



child is afforded the opportunity to continue to appropriately **participate in the general curriculum, and**



child continues to **receive** the **services** specified on the child's **IEP, and**



child continues to **participate with nondisabled children** to the extent they would have in their current placement.

Change in Placement

- ▶ If the removal is for more than **10 consecutive school days**, or
- ▶ The child has been subjected to a **series of removals that constitute a pattern**
 - Series of removals total more than 10 school days in a school year
 - Child's behavior is substantially similar to the child's behavior in previous incidents that resulted in the series of removals
 - Additional factors, such as: length of each removal, total amount of time the child has been removed, proximity of the removals to one another
- ▶ Could include exclusions that take place outside of IDEA's discipline provisions which occur because of a child's behavior: **"informal removals"**

Change in Placement

- ▶ “SEAs should examine these practices in conjunction with their duty to monitor LEAs’ compliance with discipline provisions and the IEP, placement, and the least restrictive environment requirements of IDEA.” (C-1)



Interim Alternative Educational Setting

- ▶ Provides a definition of IAES, identical to data reported under **Section 618**

An **appropriate setting** determined by the child's IEP Team or a hearing officer in which the child is placed **for no more than 45 school days**.

This setting enables the child to continue to **receive educational services** so as to enable them to participate in the general education curriculum (although in another setting) and to progress toward meeting the goals set out in the IEP.

As appropriate, the setting includes an FBA, and behavioral intervention services and modifications to **address the behavior violation** so that it does not recur.

Virtual Instruction as an IAES

- Home instruction could be delivered through a virtual, in-person or hybrid approach.
- Must continue to allow the child to participate in the general education curriculum and progress toward IEP goals

▶ HOWEVER...

- SEAs and LEAs should be cautious about excluding a child with a disability from their regular education program to provide virtual instruction for the sole purpose of responding to a child's behavior.
- Removing a child from their regular education program without ensuring behavioral supports have been made available throughout a continuum of placements, could result in an inappropriately restrictive placement and denial of FAPE.

Removals for Special Circumstances

- ▶ Reiterates IDEA's requirements involving a removal due to weapons, drugs, or serious bodily injury. (E-1)
- ▶ Addresses the concept of risk or threat assessments
 - States and LEAs should ensure that school personnel involved in screening for, and conducting risk or threat assessments of children with disabilities are aware that the child has a disability and are sufficiently knowledgeable about the LEA's FAPE obligation, including IDEA's discipline provisions. Where appropriate, coordinate with child's IEP Team. (E-5)



Informal Removals Matter

Informal Removal: Definition

Action taken by school personnel in response to a child's behavior that **excludes the child for part or all of the school day, or even an indefinite period of time.**

These exclusions are considered informal because the school **removes the child with a disability** from class or school **without invoking IDEA's disciplinary procedures.**

Informal removals are **subject to IDEA's requirements** to the same extent as disciplinary removals by school personnel using the school's disciplinary procedures.

Informal removals **include administratively shortened school days** when a child's school day is reduced by school personnel, outside of the IEP Team and placement process, in response to the child's behavior. (C-1, C-6, glossary)

Informal Removal and Change in Placement

- ▶ In general, the use of informal removals to address a child's behavior, if implemented repeatedly throughout the school year, could constitute a disciplinary removal from the current placement.
 - Therefore, the discipline procedures would generally apply unless all three of the following factors are met:
 - the child is afforded the opportunity to continue to appropriately participate in the general curriculum;
 - the child continues to receive the services specified on the child's IEP; and
 - the child continues to participate with nondisabled children to the extent they would have in their current placement. (C-6)
- ▶ The practice of shortening a child's school day as a disciplinary measure could be considered a denial of FAPE if the child's IEP Team does not also consider other options such as additional or different services and supports that could enable a child to remain in school for the full school day.(C-6)



Discipline disparities are longstanding & persisting

State Oversight & Reporting Responsibilities

- ▶ Important role of SEA and LEA oversight
- ▶ General supervisory responsibilities
 - SEAs should play particular attention to LEA and Statewide discipline data and discipline policies, procedures, and practices when exercising their general supervisory responsibilities. (L-1)
 - Applies to all publicly placed children with disabilities, including those placed in a program operated by another public agency (e.g. Head Start) (L-3)

State Oversight & Reporting Responsibilities



General Supervision



Significant
Discrepancies in Long-
Term Suspensions,
Expulsions



Significant
Disproportionality



State Oversight & Reporting Responsibilities

- ▶ Significant discrepancies in long-term suspensions and expulsions, disaggregated by race and ethnicity
 - State chosen methodology must be reasonable (L-6)
 - Factors OSEP may consider in determining reasonableness include whether none, or a very low percentage of, the State's LEAs are being examined for significant discrepancy, and whether statistically sound alternative methodologies exist or are being used by similarly-situated states. (L-6)
 - Included in [FFY 2021 Part B SPP/APR General Instructions](#) for Indicators 4A and 4B

For FFY 2021 Submission

Part B State Performance Plan and Annual Performance Report (Part B SPP/APR)

General Instructions

Each State is required to submit a Part B SPP/APR for FFY 2023.

The State's FFY 2023 SPP/APR must include:

- 1) An introduction, which provides information on the State's progress in implementing the SSIP, and how the State is informed of and using data to improve outcomes for children with disabilities. The State's SPP/APR must include descriptions of the State's methodology for examining data for significant discrepancies in long-term suspensions and expulsions of children with disabilities among LEAs in the State or compared to the rates for nondisabled children within those LEAs. Factors that OSEP may consider in determining reasonableness of the State's methodology include whether none, or a very low percentage of, the State's LEAs are being examined for significant discrepancy under the State's chosen methodology, and whether statistically sound alternative methodologies exist or are being used by similarly-situated States.²

a. General Statewide Methodology

where, on its Web site, a complete copy of the State's SPP/APR, including any revisions, if the State has revised the targets that it submitted with its FFY 2020 APR in 2022, is available.¹

- 2) Baseline data for Indicators 1 through 17. If the State is proposing to revise its baseline data for an indicator, it must provide an explanation for that revision.
- 3) Targets for Indicators 1 through 17 that cover the years of the SPP (i.e., FFY 2020 through FFY 2025). The State's FFY 2025 target must reflect improvement over the baseline data. If the State is proposing to revise in its FFY 2021 SPP/APR any of the targets it submitted in 2022 with its FFY 2021 SPP/APR, the State must describe its stakeholder input process.
- 4) Data from FFY 2021 and other responsive SPP/APR information for Indicators 1 through 17.
- 5) The reasons for slippage for indicators where the State did not meet its FFY 2021 target, and any slippage greater than the established threshold.
- 6) Information to address any actions required by OSEP's response to the State's FFY 2020 SPP/APR, including actions related to the correction of findings of noncompliance identified by the State.

In addition to the Phase I content of the SSIP that States were required to submit in 2015, the Phase II content that States were required to submit in 2016, and the Phase III content that States were required to submit in 2017 through 2022, the State must include the specific content required to complete Phase III of the SSIP required by Indicator 17, as well as any updates to previous Phase I, II, and III submissions. The specific content required to complete Phase III of the SSIP includes:

- a. Data Analysis;
- b. Implementation, Analysis and Evaluation;
- c. Stakeholder Engagement; and
- d. Additional Implementation Activities.

¹ In accordance with section 300.602 of the IDEA and 34 C.F.R. § 300.602, each State must disseminate information to the public on the performance of each LEA located in the State no later than 120 days following the State's submission of its Part B SPP/APR to the Secretary.

² See OSEP's *Questions and Answers: Addressing the Needs of Children with Disabilities and IDEA's Discipline Provisions*, at Question L-6 (July 19, 2022).

FFY's 2020-2025 Part B SPP/APR (OMB NO: 1820-0624 | Expiration Date: October 31, 2023) Part B SPP/APR Instruction Sheet -2

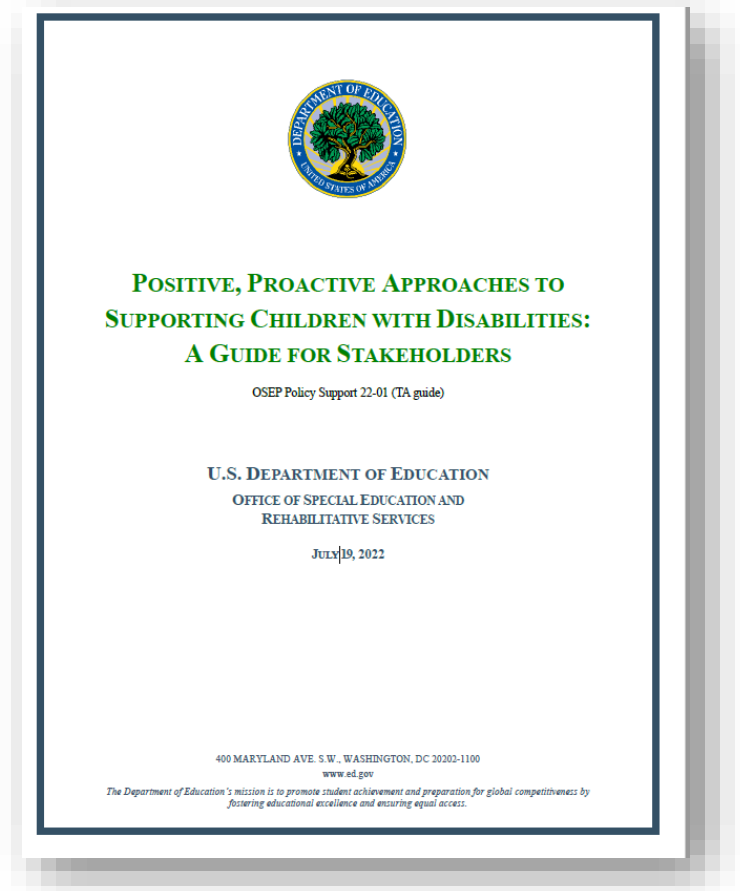


**We can
and must
do better**



Four Key Areas

- ▶ Using an Evidence-Based Approach to Support and Respond to Student Needs
- ▶ Investing in School and Educator Capacity
- ▶ Federal Funding Available to Address Disparities in, and to Reduce the Use of, Exclusionary Discipline
- ▶ Federal Resources to Support State and Local Efforts to Address Disparities in, and Reduce the Use of, Exclusionary Discipline



Policy-to-Practice

▶ 6 Strategies to Address Discipline Practices

- Addressing Discipline Disparities
- Creating a Positive Predictable Environment
- Implementing Evidence-Based Approaches to Respond to Student Needs
- Personnel Preparation to Address Social, Emotional, Behavioral Needs
- Professional Development to Address Social, Emotional, Behavioral Needs
- Reducing Exclusionary Practices

The screenshot shows the OSEP website interface. At the top, there is a yellow banner with the text "New 2022 OSEP Discipline and Behavior Guidance Resources Now Available | MORE »". Below this is a navigation bar with the "IDEAs that Work" logo and several menu items: "FEDERAL RESOURCES", "RESOURCES FOR GRANTEES", "MEETINGS AND CONFERENCES", "FIND A CENTER OR GRANT", and "ENGAGE". A search bar is located below the navigation bar, with a magnifying glass icon and the text "SITEWIDE" and "RESOURCES ONLY". The main content area is titled "2022 OSEP Discipline-Behavior Guidance". On the left side, there is a sidebar with a "Topical Issues" dropdown menu. The main content area features a large image of diverse students smiling, and a "FEATURED RESOURCE" section titled "Reducing Exclusionary Practices" with a brief description.

www.osepideasthatwork.org

8 Resource Guides on Positive, Proactive Approaches to Discipline & Behavior

Addressing Discipline Disparities

Creating a Positive Predictable Environment

Implementing Evidence-Based Approaches to Respond to Student Needs: Data-Based Decision Making

Implementing Evidence-Based Approaches to Respond to Student Needs: Multi-Tiered Systems of Support (MTSS)

Implementing Evidence-Based Approaches to Respond to Student Needs: Positive Behavior Intervention and Supports (PBIS)

Professional Development to Support Social, Emotional, and Behavioral Needs

Personnel Preparation to Address Social, Emotional, and Behavioral Needs

Reducing Exclusionary Practices

RESOURCES TO SUPPORT



Positive, Proactive Approaches to Supporting Children With Disabilities

Reducing Exclusionary Practices

Overview

Public early childhood programs, elementary, and secondary schools are responsible for meeting the needs of children with disabilities, which includes addressing their social, emotional, and behavioral needs. Far too often, positive and proactive approaches that focus on preventing interfering behavior are not part of a child's individualized education program (IEP). As a result, children with disabilities—particularly children with disabilities of color—are frequently subjected to exclusionary discipline, which removes them from their learning environment without focusing on how to best meet their unique behavioral needs. Schools and early childhood programs must understand how to protect the rights and needs of children with disabilities to ensure their disability-based behaviors are understood and that their IEPs are appropriately developed and effectively implemented to enable social, emotional, and academic success.

In July 2022, the U.S. Department of Education, Office of Special Education Programs (OSEP), published the guide [Positive, Proactive Approaches to Addressing the Needs of Children with Disabilities: A Guide for Stakeholders](#), which provides actions state educational agencies (SEAs), local educational agencies (LEAs), schools, early childhood programs, and educators can take to implement positive, proactive, and preventative practices that seek to better address a child's behavioral needs while decreasing the use of exclusionary discipline. These practices reinforce core pillars of the Individuals with Disabilities Education Act (IDEA), including how addressing the behavioral needs of children with disabilities is part of IDEA's requirement to provide a free appropriate public education (FAPE) provided in the least restrictive environment (LRE), and the IEP as the vehicle for fulfilling this obligation. By implementing practices associated with these positive and proactive approaches, students with disabilities can be assured of access to an educational environment that is nondiscriminatory, supportive, positive, and nurturing for both their academic and behavioral development.

OSEP Technical Assistance (TA) Center Resources

The resources in the following tables can support schools and early childhood programs in implementing positive, proactive approaches to support and respond to children's behavioral needs more effectively. Following the resources is information about OSEP TA Centers that can provide additional information to support schools in implementing the practices described below.

SUSPENSION AND EXPULSION

Resource	Description	Audience	Reference Citation
Manifestation Determination in School Discipline	This page provides information about the IDEA-mandated discipline procedure of "manifestation determination review," which determines whether a child's behavior that led to a disciplinary infraction is linked to his or her disability. The page includes who is involved, the scope of the review, and discussion of the different determinations and their implications for the child.	<ul style="list-style-type: none"> • Educators • School administrators • Local and district agencies 	Center for Parent Information and Resources (CPIR) (2022). <i>Manifestation determination in school discipline</i> . https://www.parentcenterhub.org/manifestation
Manifest Determination Flow Chart	This infographic illustrates the manifest determination process and options. It shows the various steps that can lead to a required manifest determination meeting.	<ul style="list-style-type: none"> • Educators • School administrators 	Reese, M. (2021). <i>Manifest Determination Flow Chart</i> . Center for Appropriate Dispute Resolution in Education. https://www.cadeworks.org/sites/default/files/resources/ID-16%20Manifestation%20Determination%20Meeting%20Flowchart%20July%202021%20-%20checked%204.2022.pdf
Pyramid Model Program Leadership Team Guidance for Preventing the Use of Suspension and Expulsion and Promoting Equitable, Inclusive, and Culturally Responsive Practice	This document provides program leadership teams with guidance to support their efforts to eliminate suspension and expulsion and promote equitable, inclusive, and culturally responsive practice in all early childhood settings, including public and private schools and childcare centers	<ul style="list-style-type: none"> • Local and district agencies • School administrators 	Smith, B. J., Dell, P., & Fox, L. (2018). <i>Pyramid Model Program Leadership Team guidance for preventing the use of suspension and expulsion and promoting equitable, inclusive, and culturally responsive practice</i> . National Center for Pyramid Model Innovations. https://challengingbehavior.cbcs.usf.edu/docs/LeadershipTeam_Guidance_Programs.pdf
Pyramid Model State Leadership Team Guidance for Preventing the Use of Suspension and Expulsion and Promoting Equitable, Inclusive, and Culturally Responsive Practice	This document provides state leadership teams with guidance on how to prevent suspension and expulsion by integrating with existing efforts, including the Pyramid Model, Multi-Tiered System of Supports (MTSS), and Quality Rating Improvement System (QRIS), inclusion, and State Systemic Improvement Plan (SSIP) efforts.	<ul style="list-style-type: none"> • State and regional agencies 	Smith, B. J., Dell, P., & Fox, L. (2018). <i>Pyramid Model State Leadership Team guidance for preventing the use of suspension and expulsion and promoting equitable, inclusive, and culturally responsive practice</i> . National Center for Pyramid Model Innovations. https://challengingbehavior.cbcs.usf.edu/docs/LeadershipTeam_Guidance_State.pdf
What Works in Reducing Suspension and Disproportionality: The Pyramid Model	In this webinar, panelists discuss their implementation of the Pyramid Model with a focus on addressing equity and eliminating the use of exclusionary discipline practices.	<ul style="list-style-type: none"> • Educators 	Allen, R., Lima, R., & Lofties, A. (2019). <i>What works in reducing suspensions and disproportionality: The Pyramid Model</i> [Webinar]. National Center for Pyramid Model Innovations. https://challengingbehavior.cbcs.usf.edu/Training/Webinar/archive/2019/11-18/2019-11-18_Keeping-Children-in-School.html



OSEP Technical Assistance Centers



[Office of Special Education Programs Technical Assistance Network \(osepideasthatwork.org\)](http://osepideasthatwork.org)





Thank You



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OFFICE OF SPECIAL EDUCATION PROGRAMS
OFFICE OF SPECIAL EDUCATION AND REHABILITATIVE SERVICES
U.S. DEPARTMENT OF EDUCATION

