

STATE OF WASHINGTON
OFFICE OF ADMINISTRATIVE HEARINGS
FOR THE SUPERINTENDENT OF PUBLIC INSTRUCTION

IN THE MATTER OF:

OSPI CAUSE NO. 2021-SE-0036

OAH DOCKET NO. 04-2021-SE-01284

LONGVIEW SCHOOL DISTRICT

**FINDINGS OF FACT,
CONCLUSIONS OF LAW,
AND ORDER**

A hearing in the above-entitled matter was held before Administrative Law Judge (ALJ) Courtney E. Beebe via video conference, on June 2 and 3, 2021. The Mother of the Student whose education is at issue¹ appeared and represented the Parents. She was accompanied and advised by her advocate Jackie Sebelles. The Longview School District (District) was represented by Parker Howell and Greg Swanson, attorneys at law. Dr. Karen Joy, Director of Special Services, attended as the District's representative. The following is hereby entered:

STATEMENT OF THE CASE

The District filed a due process hearing request on April 2, 2021, in response to the Parent's March 18, 2021, request for an Independent Educational Evaluation ("IEE"). A scheduling notice issued on April 6, 2021, and the parties appeared for a prehearing conference on April 21, 2021. The parties agreed to continue the decision due date to thirty (30) days post-close of record. A First Prehearing Order issued on April 22, 2021. The due process hearing occurred on June 2 and 3, 2021. The transcript was produced on June 17, 2021. The parties filed closing briefs by June 18, 2021. The decision is due on July 18, 2021.

EVIDENCE RELIED UPON

The following exhibits were admitted into evidence:

Parent Exhibits: P3, P4, P5, P6, P7, P8, P9, P10, P11, and P12. P1 and P2 were not admitted.

District Exhibits: D1, D2, D3, D4, D5, D6, D7, D8, D9, D10, D11, D12, D13, D14, D15, D16, D17, D18, D19, D20, D21, D22, D23, D24, D25, D26, D27, D28, D29, D30, D31, D32, D33, D34, D35, D36, D37, D39, D40, and D41.

¹In the interests of preserving the family's privacy, this decision does not name the parents or student. Instead, they are each identified as "Parents," "Mother," "Father," and/or "Student." The parent who appeared throughout the proceedings is the Student's mother. The District identified both the Mother and her Spouse in their due process hearing request. They are referred to collectively as the Parents throughout. As the Student's mother appeared throughout the proceedings, she is referred to as the Parent singularly.

The following witnesses testified under oath. They are listed in order of appearance: Shauna Gregory, Teri Cinnera, David Hedge, Erin Flinn, Crystal Allen, Misty Wilson, Saskia Rivera, Lacey Griffiths, David Dahlberg, and Dr. Karen Joy.²

ISSUES AND REMEDIES

The issue presented is:

Whether the District's February 25, 2021, reevaluation and March 18, 2021, assessment revision are appropriate, or whether the Parents are entitled to an independent educational evaluation ("IEE") at public expense.

See, Prehearing Order dated April 22, 2021.

FINDINGS OF FACT

In making these Findings of Fact, the logical consistency, persuasiveness and plausibility of the evidence has been considered and weighed. To the extent a Finding of Fact adopts one version of a matter on which the evidence is in conflict, the evidence adopted has been determined more credible than the conflicting evidence. A more detailed analysis of credibility and weight of the evidence may be discussed regarding specific facts at issue.

1. During the 2019-2020 academic year, the Student was a ninth grader at R.A. Long High School in the Longview School District ("District"). (D7, p.4.) The Student advanced to the tenth grade for the current 2020-2021 academic year. (D12, p.3.) The Student initially became eligible for special education in 2014 under the category of "other health impairment" for visual tracking and pursuit difficulties, and received specially designed instruction ("SDI") in the areas of reading and writing. (D7, p.4; Tr., pp.48-49 (Gregory); 83-87 (Cinnera).) The Student was reevaluated in 2017 and again qualified for special education services under the category "other health impairment." (*Id.*)

December 9, 2019, Reevaluation

2. The District determined on November 20, 2019, that it was required to perform a triennial reevaluation of the Student ("Triennial Reevaluation") and convened a reevaluation team ("Triennial Reevaluation Team"). (D7, p.3; Tr., pp.39, 44 (Gregory).) The Triennial Reevaluation Team consisted of the following members: the Parent; Shauna Gregory, District school psychologist; Josh Donaldson, science teacher; Brittney Thomas, physical education teacher; Katelynn Landson, English teacher / case manager; Jaylene Baker, art teacher; Billy Arn, math teacher; and Sharon Jacobs, Microsoft academy teacher. (D7, pp.3, 7-8; Tr., p.54 (Gregory).)

3. The Parent consented to the Triennial Reevaluation on November 20, 2019. (D5, p.1; Tr., p.40 (Gregory).) On the consent form, the Parent did not identify any specific areas of need. (*Id.*) On November 20, 2019, the Parent signed an "Authorization for Release of Records," authorizing "Peace Health (Dr. Aaron)" to release the Student's health records for purposes of the

² The Parent declined the opportunity to testify. (Tr., pp.19, 222, 272 (Parent).)

Reevaluation of the Student. (D6, p.1; Tr., pp.40-42 (Gregory).) The Parent also provided the District with a “Social / Developmental History Update” form. (D6, p.2; Tr., pp.41-42 (Gregory).) The Parent had an opportunity to “note any changes you have observed in your child over the past three years that should be considered with regard to design of his / her current educational program.” (*Id.*) The Parent noted that the Student has “ear tubes for frequent ear infections,” that the Student “was born premature and drug affected,” and that he “has always struggled in school.” (*Id.*)

4. Shauna Gregory³, the District’s school psychologist then assigned to R.A. Long High School, performed the Triennial Reevaluation of the Student between November 20, 2019, and December 9, 2019. (D7, p.3; Tr., pp.39-41 (Gregory).) Ms. Gregory assessed the Student in the areas of academic, medical-physical, and general education, and she reviewed existing data. (D7, p.3; Tr., pp.42-43 (Gregory).) The academic assessment included reading, writing, and math. (Tr., p.43 (Gregory).) Ms. Gregory obtained the Student’s grades and information from his general education teachers. (D7, pp.8-10; Tr., pp.44-49 (Gregory).) At the time of the Triennial Reevaluation, the Student’s grades were A’s and B’s. (*Id.*) The Student’s teachers identified that the Student’s disabilities affected his ability to focus, stay on task, comprehend reading, and put his ideas in writing. (*Id.*) The Student’s teachers provided information that the Student received the following accommodations and modifications: preferential seating, modified assignments, extra time on tests and assignments, use of a word processor, frequent checks for understanding, completed or guided copy of notes, chunking assignments, and drill and repetition. (D7, p.9.) The Student’s teachers did not identify math or executive functioning as areas of concern. (*Id.*)

5. In 2014, as part of the Student’s initial evaluation, the District administered the Woodcock-Johnson III Tests of Cognitive Abilities – Third Edition (WJ-III Cog) and the Student received a general intellectual ability score in the average range (SS 90). (D7, p.10; Tr., pp.48-49 (Gregory).) As part of the Triennial Reevaluation, Ms. Gregory administered the Woodcock-Johnson Test of Achievement, 4th Edition (WJ-IV) that “looked at reading, writing and math.” (D7, p.11; Tr., pp.49-50 (Gregory).) The Student scored “Very Low” in the areas of Basic Reading Skills and Reading Fluency, and “Low Average” or “Average” in the areas of Reading Comprehension, Math Calculation, Math Problem Solving, and Written Expression. (D7, p.11; D8, p.1; Tr., pp.50-52, 62 (Gregory).)

6. Based on the Student’s results, the Triennial Reevaluation Team concluded that there is a severe discrepancy between achievement and ability such that the Student required special education in the area of reading. (D7, pp.6, 12; Tr., pp.46, 52 (Gregory).) Regarding the area of writing, although the Student’s scores did not “meet state discrepancy requirements, considering standard error of measurement and his classroom performance, the [Reevaluation Team] determined that [the Student] continues to require specially designed instruction in writing.” (D7, pp.6, 13; Tr., p.52 (Gregory).)

³ Shauna Gregory, District School Psychologist, has worked for the District for seven years and as a school psychologist for 23 years. (Tr., pp.38-39 (Gregory).) Ms. Gregory has a bachelor’s degree in psychology, a master’s degree in school psychology, and a master’s degree in educational administration, and a post-grad certificate in educational administration and continuing education. (Tr., p.39 (Gregory).)

7. Regarding the Student's Medical – Physical / Health information, Ms. Gregory attempted to obtain the Student's medical information from "Peace Health multiple times, but medical records were not provided." (D7, p.8; Tr., pp.40-41, 47-48 (Gregory).) The Parent informed Ms. Gregory of the Student's prenatal drug exposure and premature birth, but noted that there were no behavior, mental health, or other patterns of concern. (*Id.*) Ms. Gregory did not receive any information from the Student's Parent and teachers that vision was an area of concern. (Tr. pp.43-44, 65 (Gregory).)

8. The Triennial Reevaluation Team concluded that the Student remained eligible for special education services because of a "specific learning disability demonstrating a disorder in one or more of the basic psychological processes involved in understanding or using spoken or written language which prevents the student from achieving commensurate with his or her age and ability levels in" reading and writing. (D7, pp.4-5; Tr., pp.45-47 (Gregory).) The Triennial Reevaluation Team recommended changing the Student's eligibility category from "other health impairment" to "specific learning disability" because of the severe discrepancy between his cognitive abilities and is academic abilities in reading and writing. (*Id.*) Also, because of the lack of medical information from Peace Health or the Parent, the Triennial Reevaluation Team could not make an eligibility determination based on the category of "other health impairment." (Tr., pp.65-67 (Gregory).) Instead, the Triennial Reevaluation Team concluded that the Student's specific learning disability "adversely impacts his ability to be successful in the general curriculum in all classes that require grade level reading and writing skills. [The Student's] very low skill development in reading and writing are significantly discrepant from his average cognitive abilities." (*Id.*). (D7, p.6; Tr., pp.52-54 (Gregory).)

9. On December 2, 2019, the District issued a "Notice of Meeting" to the Parent giving notice of a Triennial Reevaluation meeting on December 9, 2019. (D7, p.1; Tr., pp.54-55 (Gregory).) The purpose of the meeting was to review the Student's Triennial Reevaluation reports and educational progress, and make an eligibility determination. (*Id.*) The following members of the Triennial Reevaluation Team attended the meeting: Ms. Baker, Ms. Landson, Ms. Gregory, and Lucy Griffiths, assistant principal and the District's representative. (D7, p.7; Tr., p.54 (Gregory).)

10. The Parent did not attend the December 9, 2019, Triennial Reevaluation meeting. (D7, p.2; Tr., pp.54-55 (Gregory).) The District contacted the Parent on December 10, 2019, and informed the Parent of the results of the Triennial Reevaluation. (D7, p.2.)

11. On December 9, 2019, the District issued a Prior Written Notice ("PWN") to the Parent, proposing to continue the Student's eligibility for special education services in the areas of reading and writing, due to a specific learning disability. (D7, p.14; Tr., pp.55-56 (Gregory).)

12. The District issued an Individualized Education Program ("IEP") invitation on December 2, 2019, inviting the Student's IEP team to a meeting also on December 9, 2019, at 2:30 p.m., to discuss the Student's annual goal progress, review the current IEP, and review instructional needs. (D9, p.1. The Parents did not respond and did not attend the December 9, 2019, IEP meeting. (D9, p.2.) The IEP Team, except for the Parents, signed the December 9, 2019, IEP. (D9, p.3.) The District issued a PWN to the Parent on December 9, 2019, proposing to continue the Student's IEP to provide SDI in reading and writing. (D9, pp.18-19.) The Students IEP did not provide for SDI in the area of math, but did provide for modifications and accommodations,

including the use of a “text-to-speech” assistive device, extra time to respond and complete, and the use of a graphic organizer. (D9, pp.12-13.)

February 25, 2021, Reevaluation

13. The following year, on December 17, 2020, the District convened the Student’s IEP Team, including the Parent, to review and discuss the Student’s proposed annual IEP and the Parent’s concerns about the Student’s performance. (D11, pp.1-4; D12, pp.1-21; P3, pp.1-2; Tr., pp.73-77 (Cinnera).) The following individuals attended: Ms. Griffiths; Teri Cinnera⁴ (Sato), District’s school psychologist; Saskia Rivera, Student’s case manager and math teacher; the Parent, Ms. Baker, art teacher; Erin Flinn, history teacher, Rich Reeves, principal; and Brittany Thomas, physical education teacher. (*Id.*)

14. At the December 17, 2020, IEP meeting the Parent expressed concerns about the Student’s ability in the areas of reading, writing, and math, and requested accommodations and modifications to assist with note taking, following directions, and organization. (*Id.*) The Parent requested that the District engage in “career” testing to develop a post-secondary plan for the Student. (*Id.*) David Hedge, the Student’s special education and strategic English teacher, state that he and the Student’s case manager, Saskia Rivera, would conduct a career assessment after the Christmas break or the Parent could access the “ONET” assessment tool on-line. (D11, p.3; Tr., pp. (Hedge).)

15. The Parent requested that the Student be evaluated in the area of math, as well as academic, vision, medical-physical, general education, cognitive, assistive technology, and executive function. (*Id.*) The Parent signed a consent to evaluate form (“Consent Form”), listing these areas of concern on January 5, 2021. (D18, pp.4-6.; D19, pp.6-8; Tr., pp.86-90 (Cinnera).)

16. After the December 17, 2020, IEP meeting the District issued a PWN proposing to initiate a reevaluation (“2021 Reevaluation”) of the Student in the areas of “cognitive, vision needs (tracking disorder), self-advocacy (executive functioning), and a dyslexia screening.” (D12, p.8; Tr., pp.81-82; (Cinnera); 145-147 (Hedge).) In addition, on December 18, 2020, the District emailed the Parent a copy of WAC 392-172A-01035, to inform her about the “other health impairment” eligibility category. (D13, pp.1-5; Tr., pp.83-84 (Cinnera).) On January 5, 2021, the District issued a PWN proposing the final scope of the 2021 Reevaluation:

After reviewing the IEP and hearing concerns from parents the team is deciding to initiate a reevaluation for [the Student] looking at academic, vision needs (tracking disorder), self-advocacy (executive functioning), and a dyslexia screening.

(D19, p.3.)

⁴ Teri Cinnera has a bachelor’s degree in psychology from Portland State University, and a master’s in education plus 45 credits from George Fox University. (Tr., pp.71-72 (Cinnera).) Ms. Cinnera has worked for the district for two years. (*Id.*) Ms. Cinnera used the last name Sato during a portion of the 2020-2021 academic year. (Tr., p.74 (Cinnera).) Ms. Cinnera replaced Ms. Gregory at R.A. Long High School during the 2020-2021 academic year.

17. Ms. Cinnera provided the Parent with an “Authorization for Release of Records” form on January 4, 2021, authorizing Peace Health to release the Student’s health records and medical diagnoses. (D16, p.2; Tr., pp.83-84 (Cinnera).) The District did not receive a signed copy of this form from the Parent. (Tr., pp.83-85, 91-92 (Cinnera).) On January 4, 2021, the Parent emailed Ms. Cinnera stating “Medical release form – at this time I will not be signing but let me know what records you are wanting and I will decide if that is something we would like to share.” (D17, p.1; Tr., pp.83-85, 91-92 (Cinnera).) Ms. Cinnera responded:

The information I would be seeking in the medical records would be in reference to any diagnosis [the Student] has due to the information provided by you in the initial evaluation. It is up to you whether or not you want to provide this information. In our meeting December 18 (sic), 2020, you were concerned about his eligibility category being changed from Other Health Impaired (sic), therefore it may be beneficial to have the medical diagnosis. But again, it is up to you.

(*Id.*) The Parent completed a social and developmental history update form, reporting that the Student did not take any medication, did not have any current life stressors, and that he was born premature and drug affected. (D28, p.9.) The Parent did not provide any other medical information or records for purposes of the 2021 Reevaluation, or inform the District why she believed that the Student may continue to qualify for special education services under the category of “other health impairment.” (D28, p.9; Tr., pp.91-92, 105-106 (Cinnera).)

18. The Student was assessed in the areas of academic, vision, medical-physical, general education, cognitive and executive function, as well as assistive technology. (D28, p.4; Tr., pp.93-95 (Cinnera).) Ms. Cinnera reviewed the Student’s 2014, 2017, and 2019 evaluations. (D28, pp.5-6; Tr., pp.83-87, 103-105 (Cinnera).)

19. On February 5, 2021, Ms. Cinnera administered the Woodcock-Johnson Fourth Edition Tests of Cognitive Abilities (WJ-IV-COG) to assess cognitive functioning. (D28, p.13; Tr., pp.113-115 (Cinnera).) The Student received a standard score in general intellectual ability of 83, and a score of 71 in Total Comprehension / Knowledge, both of which are in the below average range of 76-90. (*Id.*)

20. On February 17, 2021, Ms. Cinnera administered the Behavior Rating Inventory of Executive Functioning, Second Edition (BRIEF-2). (D28, pp.18-21; Tr., pp.116-119 (Cinnera).) The Parent and Student completed the BRIEF-2 Rating Scales, Parent Form, and Self-Report Form, to provide information about the Student’s executive functioning. (D21, p.1; D22, p.1; Tr., pp.93-95 (Cinnera).) The Student’s teachers also provided “global executive composite” information to Ms. Cinnera. (D28, pp.18-21; Tr., pp.116-119 (Cinnera).) When compared to other males age 14-18, the Student’s overall scores fell within the clinically elevated range at home and the average range at school. (*Id.*) The results of the BRIEF-2 revealed that the Student:

demonstrates difficulties in the home setting, reported by parent and [the Student], with starting and sticking with tasks, anticipating and planning for future events and goals, maintaining an organizational system, and reevaluating his progress. These

difficulties are not demonstrated in the school environment according to [the Student's] teachers.

(Id.)

21. On February 12, 2021, Ms. Cinnera administered the Wechsler Individual Achievement Test – Third Edition (WIAT-III) to assess the Student's academic achievement in the areas of reading, writing, and math. (D28, pp.14-16; Tr., pp.107-108, 115-116 (Cinnera).) The Student scored Below Average in each area. (Id.) Specifically, the Student receive the following scores:

Composite	Standard Score (Score <85 are normative weaknesses)	95% Confidence Interval	Percentile Rank	Qualitative Description
Oral Language	76	68-84	5	Below Average
Total Reading	73	67-79	4	Below Average
Basic Reading	74	68-80	1	Below Average
Reading Comp & Fluency	74	66-82	4	Below Average
Written Expression	79	72-86	8	Below Average
Mathematics	75	69-81	5	Below Average
Math Fluency	81	74-88	10	Below Average
Total Achievement	73	69-77	4	Below Average

(Id.)

22. Misty Wilson⁵ completed a vision screening of the Student on February 23, 2021. (D28, pp.16-17; Tr., pp. 193-203 (Wilson).) Ms. Wilson did not receive any reports from the Student's eye doctor, but after conducting near vision and distance vision assessments she concluded that the Student "has the functional vision necessary to access his educational materials and learning environment." (Tr., pp.193-203) Ms. Wilson determined that the Student did not qualify for any school based vision services. (Id.)

23. Crystal Allen,⁶ the District's literary specialist / dyslexia therapist, performed a dyslexia assessment with the Student on January 5, 2021, and provided the results to Ms. Cinnera for the 2021 Reevaluation. (D28, pp.17-18; Tr., pp.181-188 (Allen).) Ms. Allen did not make a diagnosis of dyslexia, but performed evaluative assessments in oral language, phonological awareness,

⁵ Misty Wilson has worked for the District as a teacher of the visually impaired and a certified Brailist for over twenty years. (Tr., pp.192-193 (Wilson).) Ms. Wilson is a certificated teacher in special education and reading. (Id.)

⁶ Ms. Allen has been a teacher for over twenty years and works as the literacy facilitator for the District. (Tr., pp.179-180 (Wilson).) Ms. Allen has a bachelor's degree in human development from Washington State University and a master's in teaching degree. (Id.) Ms. Allen attended the Neuhaus Education Center and became a certified dyslexia therapist. (Id.)

letter recognition, and reading abilities. (*Id.*) Based on the results of the assessment, Ms. Allen recommended that the Student “be offered an intervention program that would allow him to learn the basic patterns of the English language. The time spent should be a combination of phonological awareness, alphabetic principle, and application writing.” (*Id.*)

24. Saskia Rivera⁷, the Student’s case manager and general education geometry teacher, co-teaches the Student’s geometry class with general education teacher Dave Dahlberg. (Tr., p.208 (Rivera).) Ms. Rivera, a special education teacher and the Student’s case manager, was not assigned to deliver services to the Student in the area of math, because the Student did not qualify for SDI in math. (Tr., pp.208-219 (Rivera).) Ms. Rivera identified the Student as one of the “top performers in the class,” but the Student struggled to turn work in on time during September 2020 due to the on-line learning format resulting from the Covid-1 public health emergency. (*Id.*) Ms. Rivera reported that the Student received an A in geometry as of February 2021, and that she observed the Student self-advocate and contribute in the classroom. (*Id.*) Ms. Rivera informed the 2021 Reevaluation Team that in her opinion the Student did not need SDI in the area of math. (*Id.*)

25. Dave Dahlberg⁸, the Student’s general education geometry teacher, reported that the Student understands geometry “more quickly compared to his classmates” and he did not have any academic or behavioral concerns about the Student. (D28, p.11; Tr., pp.255-264 (Dahlberg).) Mr. Dahlberg provided the Student with copies of notes, tasks broken into small parts, and specific directions. (*Id.*) Mr. Dahlberg reported that the Student occasionally lacks confidence in his ability but ranked “4th out of 25” students in the class and did not need assistance in the area of math. (*Id.*) Regarding the Student’s performance in September 2020 when the Student’s grades fell below a C average, Mr. Dahlberg noted that the Student fell behind handing in assignments but maintained a high level of understanding and growth. (D38, p.1; Tr., pp.256-259.)

26. David Hedge⁹, the Student’s special education strategic English teacher, did not identify any behavioral concerns about the Student, but reported that the Student struggles with “decoding and comprehension,” due to a “limited vocabulary.” (D28, p.12; Tr., pp.145-147 (Hedge).) Mr. Hedge reported that he provides interventions like sentence frames for written response, training on voice typing and “text-to-speech” assistive technology, repeats instructions, models thinking, and checks for understanding. (D28, p.12; Tr., pp.154-156.) Mr. Hedge also reported that the Student had received a grade of “I” for “incomplete because the Student did not timely turn in assignments. (Tr., pp.124, 147-148 (Cinnera).)

⁷ Saskia Rivera is a special education teacher at R.A Long High School and has worked there for nine-years. (Tr., pp.207-208 (Rivera).) Ms. Rivera has a bachelor’s degree in education with an endorsement in general education and special education, as well as a master’s degree in curriculum and instruction. (*Id.*) Ms. Rivera is a national board certified teacher under the category of exceptional needs specialist. (*Id.*)

⁸ Dave Dahlberg has a bachelor’s degree in education from Dr. Martin Luther College and his teaching certificate from St. Martin’s College. (Tr., pp.254-255 (Dahlberg).) Mr. Dahlberg has taught math and science at R.A. Long High School for 13 years. (*Id.*)

⁹ David Hedge is the Student’s English teacher in the resource room setting. (Tr., pp.142-144 (Hedge) Mr. Hedge has a bachelor’s degree in ministry and music, and a master’s degree in special education. (*Id.*)

27. Erin Flinn,¹⁰ the Student's U.S. History teacher, reported that she did not have any academic or behavioral concerns for the Student and that he participated in class by adding to conversations and socializing. (D28, p.12; Tr., pp.168-174 (Flinn).) Ms. Flinn employs accommodations and modifications such as "text-to-speech" assistive technology and vision pieces, and giving extra time on assignments and second chances to redo work. (*Id.*)

28. Lacy Griffiths,¹¹ the assistant principal and the District's representative, contributed information about the Student's attendance to the 2021 Reevaluation. (D28, pp.10-11; D36, p.1; Tr., pp.111-113 (Cinnera); 239-240 (Griffiths).) The Student's attendance records showed that he was absent from school on five days during the 2020-2021 school year, or less than 5 percent of the time. (*Id.*) Ms. Griffiths also provided information about the Student's grades for purposes of the 2021 Reevaluation. (D28, pp.10-11; D36, pp.2-3; Tr., pp. 241-242 (Griffiths).) The Student's grade records showed that the Student received an A in U.S. History, Geometry, and Lifetime Fitness, a B in Art and Biology, and a C in strategic English during the Fall 2020 semester. (*Id.*) Ms. Griffiths observed the Student self-advocate, socialize, and participate in class. (Tr., pp.242-244 (Griffiths).)

29. Ms. Thomas, the Student's Lifetime teacher, and Ms. Baker, the Student's art teacher, also reported no academic or behavioral concerns about the Student. (D28, p.12.)

30. The Student's teachers all reported that the Student had access to and was trained to use the "text-to-speech" device to assist him with reading skills, but the Parent informed Ms. Cinnera that the Student did not know how to use the device. (Tr., pp.97-98 (Cinnera).) As part of the evaluation, Ms. Cinnera included a recommendation to provide the Student with training to use the "text-to-speech" assistive technology. (*Id.*)

31. On February 23, 2021, Ms. Cinnera emailed the Parent a draft copy of the 2021 Reevaluation report ("2021 Reevaluation Report"). (D24, pp.1-36; Tr., pp.93-95 (Cinnera).) This draft 2021 Reevaluation did not include Ms. Wilson's vision report as it had not been completed. (D25, p.1; Tr., pp. (Cinnera).)

32. The 2021 Reevaluation Team, including the Parent convened via an on-line meeting on February 25, 2021. (D17, pp.1-4; D28, p.1; Tr., pp.99-100 (Cinnera); 246-248 (Griffiths).) The 2021 Reevaluation Team consisted of: Ms. Cinnera, Ms. Flinn, the Parent, the Parent's spouse, Ms. Wilson, Ms. Griffiths, Ms. Rivera, and Dr. Karen Joy, Director of Special Services. (D28, p.26;

¹⁰ Erin Flinn has taught social studies at R.A. Long High School for eight years and has a bachelor's degree in political science from Western Washington University, and a master's degree of initial teaching from Gonzaga University. (Tr., pp.166-167 (Flinn).) Ms. Flinn is earning a second master's degree in educational leadership. (*Id.*)

¹¹ Lacey Griffiths is the assistant principal at R. A. Long High School and is tasked with overseeing the special education department. (Tr., pp.237-240 (Griffiths).) Ms. Griffiths has a bachelor's degree in education from the University of Montana and a reading endorsement, as well as a master's degree from the University of Portland. (*Id.*) Ms. Griffiths has experience as a classroom teacher and special education teacher. (*Id.*)

Tr., pp.100-101 (Cinnera); 246-248 (Griffiths).) Ms. Gregory also attended the February 25, 2021, meeting to answer questions about the December 9, 2019, Triennial Reevaluation. (Tr., pp.57-59, 101 (Gregory).) The 2021 Reevaluation Team deliberated the 2021 Reevaluation, concluding that the Student's scores in reading and written language did not meet the state discrepancy standards for a specific learning disability. (D28, p.22; Tr., pp.105-108, 119-120 (Cinnera); 246-248 (Griffiths).)

33. However, given the "standard error of measurement and classroom performance," the 2021 Reevaluation Team determined that in their professional judgement, the Student continued to require SDI in the areas of reading and writing. (D28, p.6; Tr., pp.106-107, 119-123 (Cinnera).) Specifically, "based on the standard error of measurement, where [the Student]'s IQ score falls between 76 and 90, and his academic score in reading falls between 68 and 80, [the Student] continues to qualify for specially designed instruction in reading" and "written expression." (*Id.*) The 2021 Reevaluation Team determined that the Student did not meet the state discrepancy standards for a learning disability in math, and that in their professional judgment the Student did not qualify for SDI due to the standard of error and classroom performance in the area of math. (D28, p.22; Tr., pp.107-109, 119-123 (Cinnera); 247-249 (Griffiths).) Also, the 2021 Reevaluation Team determined that the Student was not eligible for special education services in the areas of vision, executive functioning, or medical-physical, based on the information provided and the assessments' performed. (*Id.*)

34. The District issued a PWN on February 25, 2021, "proposing to continue [the Student's] educational placement, IEP, and eligibility category." (D28, pp.24-25; Tr., pp.119-121, 126-127 (Cinnera).) The Parent was provided with the complete 2021 Reevaluation at the February 25, 2021, Reevaluation Team meeting. (*Id.*) The Parent requested additional time to review the 2021 Reevaluation report and agreed to schedule another meeting to complete the 2021 Reevaluation process and review a proposed IEP. (*Id.*)

35. After the meeting, Ms. Gregory emailed the Parent a link to the copy of the "Identification of Students with Specific Learning Disabilities Sever Discrepancy Table" from the Washington State Office of the Superintendent of Public Instruction. (D26, p.1; Tr., pp.59-61 (Gregory).)

36. On March 18, 2021, the District reconvened the following members of the Student's 2021 Reevaluation Team: Ms. Cinnera, Ms. Thomas, Ms. Griffiths, Ms. Gregory, Ms. Flinn, Ms. Wilson, Ms. Perkins, Ms. Hedge, Ms. Rivera, Dr. Joy, Mr. Dahlberg, and Ms. Baker. (D30, p.1; D31, p.1; D31, p.8; Tr., pp.127-133 (Cinnera); 268-270 (Joy).) The Parent attended with her advocate Jackie Sebelle. (*Id.*)

37. The Parent requested that the Student receive special education services in the area of math and that his IEP include a math goal. (*Id.*) The Parent also requested the IEP team add additional accommodations.¹² (D31, p.4; D40, pp.2-3; Tr., pp.127-133 (Cinnera); 269-272 (Joy).)

¹² The Parent requested the following accommodations: visual aids, manipulatives for math and writing, extra time to respond and turn in assignments, a calculator, copies of notes and study guides, call on only when had is raised, repeat directions to ensure understanding, non-verbal prompts to begin / return to task,

The 2021 Reevaluation Team and IEP Team members present agreed to the Parent's request for additional accommodations but declined to add a math goal as the Student did not qualify for SDI in the area of math. (*Id.*)

38. The individuals present on March 18, 2021, also discussed transitioning the Student to college and evaluating the Student for functional vocational skills / adaptive skills and independent living. (D32, p.2; Tr., pp.131-133 (Cinnera).) However, the Parent and her advocate informed the District that they would be seeking an Independent Educational Evaluation ("IEE") instead of agreeing to the District conducting an assessment in the area of functional vocational / adaptive skills. (*Id.*)

39. On March 18, 2021, the District issued a "Notification of Assessment Revision," to document that the 2021 Reevaluation Team had met on March 18, 2021, at the same time as the IEP Team. (D31, p.3; Tr., pp. (Cinnera).) The Notification of Assessment Revision stated:

Team met again to follow up and give parent an opportunity to address any concerns from the reevaluation dated February 25, 2021. No additional information was provided by the Parent during this meeting. The Parent and the advocate requested a math goal for [the Student] and some accommodations to be added to the IEP.

(*Id.*)

40. The District also issued an Assessment Revision on March 18, 2021 ("Assessment Revision"), reflecting that the 2021 Reevaluation Team met and reviewed the February 25, 2021, Reevaluation and concluded a second time that the Student was eligible for special education services in the areas of reading and writing due to a specific learning disability. (D31, p.4; Tr., pp. (Cinnera).) The 2021 Assessment Revision also provided that the 2021 Reevaluation Team declined the Parent's request to conclude that the Student was eligible for special education services in the area of math, because the 2021 Reevaluation did not show that the Student suffered any adverse educational impact in the area of math. (*Id.*)

41. On March 18, 2021, the District issued a PWN "proposing to continue [the Student's] educational placement, IEP, and eligibility category." (D31, p.7.)

42. The Parent submitted a request for an IEE on March 18, 2021. (D33, pp.1-4.)

43. The District denied the Parent's request on March 23, 2021. (D35, p.4.) Also on March 23, 2021, the District issued an IEP meeting invitation to the Parent to "discuss transition services, discuss annual goal progress, review current IEP, discuss graduation and review instructional needs." (D34, p.1; Tr., pp.129-130 (Cinnera); 250-251 (Griffiths).) The purpose of the meeting was to review a "secondary transition amendment" to the Student's IEP and add the agreed upon accommodations. (D34, pp.8-12; Tr., pp.129-130 (Cinnera); 250-251 (Griffiths).) The Parent

small group or separate location for testing, breaks when needed, preferential seating, alternate ways to test, and tests read aloud. (D40, pp.2-3.)

agreed to the “secondary transition amendment” and the accommodations amendment to the IEP and waived the IEP meeting. (Tr., pp.250-251 (Griffiths).) The District issued a PWN on March 23, 2021, amending the Student’s most current IEP with the secondary transition amendment and agreed upon accommodations. (*Id.*)

CONCLUSIONS OF LAW

The IDEA and Jurisdiction

1. The Office of Administrative Hearings (OAH) has jurisdiction over the parties and subject matter of this action for the Superintendent of Public Instruction as authorized by 20 United States Code (USC) §1400 *et seq.*, the Individuals with Disabilities Education Act (IDEA), Chapter 28A.155 Revised Code of Washington (RCW), Chapter 34.05 RCW, Chapter 34.12 RCW, and the regulations promulgated thereunder, including 34 Code of Federal Regulations (CFR) Part 300, and Chapter 392-172A Washington Administrative Code (WAC).

2. The burden of proof in an administrative hearing under the IDEA is on the party seeking relief, in this case the District. *Schaffer v. Weast*, 546 U.S. 49, 126 S. Ct. 528 (2005). A school district satisfies its burden to prove the appropriateness of its evaluation when it demonstrates that the evaluation was timely completed under WAC 392-172A-03015, met the requirements of WAC 392-172A-03020, and was documented in a report satisfying WAC 392-172A-03035. See e.g., *In the Matter of Lake Washington School District*, 2020 SE-0076, 121 LRP 1642 (WA SEA 2020); *In the Matter of Renton School District*, 2010-SE-0020, 110 LRP 26520 (WA SEA 2010).

3. The IDEA and its implementing regulations provide federal money to assist state and local agencies in educating children with disabilities, and condition such funding upon a state’s compliance with extensive goals and procedures. In *Bd. of Educ. of Hendrick Hudson Central Sch. Dist. v. Rowley*, 458 U.S. 176, 102 S. Ct. 3034 (1982) (*Rowley*), the Supreme Court established both a procedural and a substantive test to evaluate a state’s compliance with the Act, as follows:

First, has the state complied with the procedures set forth in the Act? And second, is the individualized educational program developed through the Act’s procedures reasonably calculated to enable the child to receive educational benefits? If these requirements are met, the State has complied with the obligations imposed by Congress and the courts can require no more.

Rowley, supra, 458 U.S. at 206-07 (footnotes omitted). For a school district to provide a free, appropriate public education (“FAPE”), it is not required to provide a “potential-maximizing” education, but rather a “basic floor of opportunity.” *Id.* at 200-01.

4. The Supreme Court recently clarified the substantive portion of the *Rowley* test quoted above:

To meet its substantive obligation under the IDEA, a school must offer an IEP reasonably calculated to enable a child to make progress appropriate in light of the child’s circumstances. . . [H]is educational program must be appropriately ambitious in light of his circumstances . . .

Andrew F. v. Douglas County Sch. Dist. RE-1, 580 U.S. ____, 137 S. Ct. 988, 999-1000 (2017). The Ninth Circuit has explained the *Andrew F.* standard as follows:

In other words, the school must implement an IEP that is reasonably calculated to remediate and, if appropriate, accommodate the child's disabilities so that the child can "make progress in the general education curriculum," 137 S. Ct. at 994 (citation omitted), taking into account the progress of his non-disabled peers, and the child's potential.

M.C. v. Antelope Valley Union High Sch. Dist., 858 F.3d 1189, 1201 (9th Cir.), *cert. denied*, 583 U.S. ____, 138 S. Ct. 556 (2017).

5. Procedural safeguards are essential under the IDEA. The Ninth Circuit has stated:

Among the most important procedural safeguards are those that protect the parents' right to be involved in the development of their child's educational plan. Parents not only represent the best interests of their child in the IEP development process, they also provide information about the child critical to developing a comprehensive IEP and which only they are in a position to know.

Amanda J. v. Clark County Sch. Dist., 267 F.3d 877, 882 (9th Cir. 2001).

The District's 2021 Reevaluation is Appropriate.

6. If the parent of a student eligible for special education disagrees with a school district's evaluation, the parent has the right to obtain an IEE, which is an evaluation conducted by a qualified examiner not employed by the school district but at the public's expense. If such a request is made, the district must either provide an IEE or initiate a hearing to prove that its own evaluation was appropriate. If the district initiates a hearing, and the final decision is that the district's evaluation is appropriate, the parent still has the right to an IEE, but not at public expense. WAC 392-172A-05005.

7. A close review of the Parent's opening statement and written closing statement shows that the Parent asserts the 2021 Reevaluation and the 2021 Assessment Revision are inappropriate because:

- 1) the Student was not assessed in all areas of suspected disability because he was not assessed in the area of medical-physical, functional vocational skills / adaptive skills, assistive technology, oral language, executive functioning, and social / emotional;
- 2) the District did not make an eligibility determination regarding the "other health impairment" category; and
- 3) the District determined that the Student was not eligible for special education services in math.

8. The Parent does not allege that the District's 2021 Reevaluation or the 2021 Assessment Revision are otherwise inappropriate. Even so, based on the record presented it is concluded that the 2021 Reevaluation was conducted at the request of the Parent as required by WAC 392-

172A-03015(1), and completed within thirty-five (35) school days after receiving the Parent's written consent as per WAC 392-172A-03015(3) and WAC 392-172A-03003(3)(a). Further, the record shows that a "group of qualified professionals selected by the school district" used a "variety of assessment tools and strategies to gather relevant functional, developmental, and academic information about the student." WAC 392-172A-03020. The District also presented sufficient evidence to show that the 2021 Reevaluation Team reviewed existing data, information provided by the Parent, Student, and teachers, and used technically sound instruments that assess the relative contribution of cognitive, behavioral, physical and developmental factors. WAC 392-172A-03020 and 03025. The record also reflects that "trained and knowledgeable personnel" selected and administered the assessments "in accordance with any instructions provided by the producer of the assessments." *Id.*

The Student was Assessed in All Areas of Suspected Disability

9. Students must be assessed "in all areas related to the suspected disability, including if appropriate, health, vision, hearing, social and emotional status, general intelligence academic performance, communicative status, and motor abilities." WAC 392-172A-03020(3)(e). The evaluation must be "sufficiently comprehensive to identify all of the student's special education and related services needs, whether or not commonly linked to the disability category in which the student has been classified." WAC 392-172A-03020(3)(g).

10. The Parent asserts that the 2021 Reevaluation is not appropriate because the Student was not assessed in all areas of suspected disability. The Parent argues that the Student should have been assessed in the area of functional vocational skills / adaptive skills, assistive technology, oral language, executive functioning, and social / emotional. The District argues that the 2021 Reevaluation is appropriate because the Student was assessed in the areas of oral language, executive functioning, and assistive technology. The District also argues that no person identified functional vocational skills / adaptive skills and social / emotional as an area of concern during the 2021 Reevaluation process, and that at the March 18, 2021, meeting the District agreed to evaluate the Student in the area of functional vocational skills / adaptive skills, but the Parent declined to give consent after March 18, 2021.

11. The District has shown by a preponderance of the evidence that it assessed the Student in all areas identified in the January 5, 2021, PWN and the January 5, 2021 Consent Form. The Consent Form listed the following areas for evaluation: academic, vision, medical-physical, general education, cognitive, assistive technology, executive function. The District's January 5, 2021, PWN stated that the District would initiate a reevaluation in the areas of academic, vision needs (tracking disorder), self-advocacy (executive functioning), and a dyslexia screening.

12. As found and concluded above, Ms. Cinnera conducted academic assessments in reading, writing, math, and oral language using the WIAT-III. Also, Ms. Cinnera conducted an evaluation in executive functioning using the BRIEF-2 assessment. Additionally, the 2021 Reevaluation Team reviewed the Student's records, Parental and Student input, and teacher observations and reports in the areas of oral language and executive functioning. Thus, the Parent's argument that the Student was not evaluated in the areas of oral language and executive functioning is contrary to the evidence in the record.

13. Regarding assistive technology, the evidence shows the Student had consistent access to and is trained to use the "text-to-speech" device. Further, Ms. Cinnera recommended additional training after reviewing the information from Mr. Hedge provided as part of the 2021 Reevaluation.

Neither the Parent, the Student, nor the other members of the 2021 Reevaluation Team identified that the Student's assistive technology needs were not being met or other assistive technologies that would assist the Student. The Parent in her briefing has also not identified any assistive technology that she believes the Student needs to access his education. Given the evidence available, then, it is concluded that the Student's needs for assistive technology were assessed and addressed as part of the 2021 Reevaluation.

14. In the area of medical-physical, Ms. Cinnera made two efforts to obtain the Parent's consent for access to the Student's medical records, and described to the Parent the information needed and its importance. The Parent provided the information she believed to be necessary, but otherwise refused consent to disclose the Student's medical-physical records. As per the Health Insurance Portability Privacy Act (HIPPA) and the Family Education Rights and Privacy Act (FERPA), the District could not compel the Parent to disclose the Student's medical records. Regardless, as stated above, the District has an obligation to evaluate the Student in all areas of suspected disability. At the time of the reevaluation, the District had information that the Student had a suspected vision disability and potentially suffered from dyslexia. The District evaluated the Student in the area of vision and concluded that the Student's functional vision was adequate. The District did not have any other information that the Student had a medical-physical impairment that impacted the Student's ability to access his education. Thus, while the Parent argues that the Student was not assessed in the area of medical-physical, the 2021 Reevaluation Team performed as comprehensive an assessment possible with the available information.

15. As found above, the Student is [REDACTED], well after the events in this matter. On December 17, 2020, when the Student was [REDACTED], the Parent did identify "career testing" as one of the Student's needs, but she did not identify this as an area of concern on the January 5, 2021, Consent Form. Also as found above, the Parent did not list "post-secondary education," or "functional vocational / adaptive skills," as areas of concern on the January 5, 2021, Consent Form, or otherwise identify these areas as of concern between December 17, 2020 and March 18, 2021. During the 2021 Reevaluation process, the Student's teachers did not identify any issues with the Student's functional vocational / adaptive skill abilities. Only after the completion of the 2021 Reevaluation and the 2021 Assessment Revision on March 18, 2021, did the Parent raise concerns about the Student's ability to transition to post-secondary education due to a lack of functional vocational / adaptive skills.

16. Thus, during the period of December 17, 2020, to March 18, 2021, the District did not have any indication that the Student's functional vocational / adaptive skills were an area of concern and therefore the District was not required to evaluate the Student in these areas. Importantly, a district is not required to address "career testing" or post-secondary transition plans until students reach the age of sixteen years. See, WAC 392-172A-01190 and 03110. Here, the Student is not sixteen years of age as of the date of this order. Therefore, it is concluded that the 2021 Reevaluation is appropriate because the District did not have information that the Student's functional vocational / adaptive skills were an area of concern that required evaluation prior to March 18, 2021.¹³

¹³ Regardless, the District offered to perform a functional vocational / adaptive skills assessment and evaluate the Student in this area, and included a "secondary transition amendment" to the Student's March 23, 2021, IEP to address his future transition to college. The Parent has not consented to a reevaluation in the areas of functional vocational / adaptive skills as of the date of the due process hearing.

17. Finally, the Parent identifies social / emotional behavioral as an area of concern for the first time in her opening statement and written closing. Between December 17, 2020, and March 18, 2021, and even thereafter, the District did not have any indication that the Student's social-emotional behavior was an area of concern, and the Parent did not add any information regarding the Student's social / emotional behavior to the January 5, 2021, Consent Form. Granted, the Student's teachers all identified that the Student occasionally struggles with confidence and anxiety when performing academic work, but no one identified that his struggle negatively impacts his education. Again, because the Students' social / emotional behavior was not identified as an area of concern at anytime during the period of December 17, 2020, to March 18, 2021, it must be concluded that the District was not obligated to evaluate the Student. Therefore, the District appropriately assessed the Student in all areas of suspected disability in the 2021 Reevaluation and 2021 Assessment Revisions.

Eligibility Determinations

18. The Parent also claims that the 2021 Reevaluation and 2021 Assessment Revision are inappropriate because the District 1) declined to find the Student eligible for special education services under the category of "other health impairment" and 2) declined to find the Student eligible for special education services in math. The District argues that 1) due to a lack of medical-physical information the Student could not be found eligible under the category of "other health impairment," and 2) the Student did not suffer an adverse educational impact in the area of math.

19. Regarding evaluation reports, WAC 392-172A-03035 requires that the 2021 Reevaluation and 2021 Assessment Revision include: a statement of whether the student has a disability that meets eligibility criteria; a discussion of the assessments and review of data that supports the eligibility conclusion; a discussion of how the disability affects the student's progress in the general education curriculum; and the recommended special education and related services the student needs. *Id.*; see also 34 CFR §300.304-.306.

20. After the "administration of assessments and other evaluation measures," the parent of the student and qualified professionals "determine whether the student is eligible for special education and the educational needs of the student." WAC 392-172A-03040(1)(a). A Student must not be determined eligible if the Student does not "otherwise meet eligibility criteria including presence of a disability, adverse educational impact, and need for specially designed instruction." WAC 392-172A-03040(2)(b).

21. As set forth above, WAC 392-172A-05005(2)(a) specifically states that "a parent has the right to an independent educational evaluation at public expense if the parent disagrees **with an evaluation conducted or obtained** by the school district." (*Emphasis added.*) This narrow provision does not state that a parent has a right to an IEE if the parent disagrees with the District's eligibility determination. In contrast, WAC 392-172A-05080 provides that "a parent or a school district may file a due process hearing request on any of the matters relating to the identification, evaluation, educational placement, or the provision of FAPE to the student." Thus, to challenge an eligibility determination, the Parent must file a due process hearing request as per WAC 392-172A-05080. See, *South Kitsap Sch. Dist.*, Special Education Cause No. 2008-SE-0095, 110 LRP 66270 (WA SEA 2009) (reasoning that, under Schaffer, the school district has the burden of proof regarding issue of appropriateness of an evaluation but the parent has the burden regarding whether the District denied FAPE by exiting the Student from special education); and *Anaheim City Sch. Dist.*, 110 LRP 15988 (CA SEA 2010) (denying an IEE at public expense and stating that

the “statutory validity of testing, however, does not require agreement on inference or conclusions resulting from the assessment”).

22. Here, the District included eligibility determinations in the 2021 Reevaluation and 2021 Assessment Revision reports as required by WAC 392-172A-03035.

23. Further, the District filed the due process hearing request identifying the issue as whether the District’s 2021 Reevaluation and 2021 Assessment Revision are appropriate. That is the sole issue before this tribunal. The issues of whether the District made correct eligibility determinations regarding the disability category and the area of math are not properly before this tribunal because the Parent did not file a due process hearing request as per WAC 392-172A-05080. Therefore, the Parent’s challenges to the eligibility determinations in the 2021 Reevaluation and 2021 Assessment Revision are not addressed.¹⁴

ORDER

The Longview School District’s February 25, 2021, Reevaluation and March 18, 2021, Assessment Revision are appropriate. The Parents are not entitled to an IEE at public expense.

Served on the Date of Mailing.



COURTNEY E. BEEBE
Administrative Law Judge
Office of Administrative Hearings

¹⁴ Regardless, the District has shown that the 2021 Reevaluation Team appropriately determined that the Student is eligible for special education services in reading and writing under the category of “specific learning disability,” by meeting the criteria of WAC 392-172A-01035(2)(k), 03040, 03045, and 03070. While the Parent has argued that the Student’s eligibility category should be “other health impairment,” the Parent refused to provide any medical-physical information or records that identify that the Student has a health impairment that adversely impacts his education. The Parent has also not presented any evidence in this matter, or made any specific argument, regarding why the category of “other health impairment” is more appropriate than “specific learning disability.” Given that the Student was determined eligible for special education services and that the 2021 Reevaluation Team’s eligibility determination meets the criteria set forth in the applicable rules, then, it is concluded that the District’s eligibility determination is appropriate. The District has also shown that the Student is not eligible for special education services in math. The 2021 Reevaluation assessments reflect that the Student does not meet the criteria for a specific learning disability in the area of math, and given the Student’s high level performance in his geometry class and the information from his teachers, it cannot be said that the Student’s educational performance in math is adversely impacted by any disability. The 2021 Assessment Revision is similarly supported by the record and again the Parent has not presented any evidence or argument to the contrary. Therefore, the District’s eligibility determination that the Student is not eligible for special services in the area of math is appropriate.

Right To Bring A Civil Action Under The IDEA

Pursuant to 20 U.S.C. 1415(i)(2), any party aggrieved by this final decision may appeal by filing a civil action in a state superior court or federal district court of the United States. The civil action must be brought within ninety days after the ALJ has mailed the final decision to the parties. The civil action must be filed and served upon all parties of record in the manner prescribed by the applicable local state or federal rules of civil procedure. A copy of the civil action must be provided to OSPI, Administrative Resource Services.

DECLARATION OF SERVICE

I declare under penalty of perjury under the laws of the State of Washington that today I served this document on each of the parties listed below. I emailed via secure email or mailed a copy to the parties at their addresses of record using Consolidated Mail Services or U.S. Mail.

Parents

[REDACTED]

Dr. Karen Joy
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Parker Howell
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Dated July 15, 2021, at Seattle, Washington.

Representative
Office of Administrative Hearings
600 University Street, Suite 1500
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cc: Administrative Resource Services, OSPI