Indicator 17: State Systemic Improvement Plan

Instructions and Measurement

Monitoring Priority: General Supervision

The State's SPP/APR includes a State Systemic Improvement Plan (SSIP) that meets the requirements set forth for this indicator.

Measurement

The State's SPP/APR includes an SSIP that is a comprehensive, ambitious, yet achievable multi-year plan for improving results for children with disabilities. The SSIP includes each of the components described below.

Instructions

<u>Baseline Data</u>: The State must provide baseline data that must be expressed as a percentage and which is aligned with the State-identified Measurable Result(s) for Children with Disabilities.

<u>Targets:</u> In its FFY 2021 SPP/APR, due February 1, 2023, the State must provide measurable and rigorous targets (expressed as percentages) for each of the six years from FFY 2021 through FFY 2025. The State's FFY 2025 target must demonstrate improvement over the State's baseline data.

<u>Updated Data:</u> In its FFYs 2021 through FFY 2025 SPPs/APRs, due February 1, 2023, the State must provide updated data for that specific FFY (expressed as percentages) and that data must be aligned with the State-identified Measurable Result(s) for Children with Disabilities. In its FFYs 2021 through FFY 2025 SPPs/APRs, the State must report on whether it met its target.

Overview of the Three Phases of the SSIP

It is of the utmost importance to improve results for children with disabilities by improving educational services, including special education and related services. Stakeholders, including parents of children with disabilities, local educational agencies, the State Advisory Panel, and others, are critical participants in improving results for children with disabilities and should be included in developing, implementing, evaluating, and revising the SSIP and included in establishing the State's targets under Indicator 17. The SSIP should include information about stakeholder involvement in all three phases.

Phase I: Analysis:

- Data Analysis;
- Analysis of State Infrastructure to Support Improvement and Build Capacity;
- State-identified Measurable Result(s) for Children with Disabilities;
- Selection of Coherent Improvement Strategies; and
- Theory of Action.

Phase II: Plan (which, is in addition to the Phase I content (including any updates) outlined above:

- Infrastructure Development;
- Support for local educational agency (LEA) Implementation of Evidence-Based Practices; and
- Evaluation.

Phase III: Implementation and Evaluation (which, is in addition to the Phase I and Phase II content (including any updates) outlined above:

- Results of Ongoing Evaluation and Revisions to the SSIP.

Specific Content of Each Phase of the SSIP

Refer to FFY 2013-2015 Measurement Table for detailed requirements of Phase I and Phase II SSIP submissions.

Phase III should only include information from Phase I or Phase II if changes or revisions are being made by the State and/or if information previously required in Phase I or Phase II was not reported.

Phase III: Implementation and Evaluation

In Phase III, the State must, consistent with its evaluation plan described in Phase II, assess and report on its progress implementing the SSIP. This includes: (A) data and analysis on the extent to which the State has made progress toward and/or met the State-established short-term and long-term outcomes or objectives for implementation of the SSIP and its progress toward achieving the State-identified Measurable Result(s) for Children with Disabilities (SiMR); (B) the rationale for any revisions that were made, or that the State intends to make, to the SSIP as the result of implementation, analysis, and evaluation; and (C) a description of the meaningful stakeholder engagement. If the State intends to continue implementing the SSIP without modifications, the State must describe how the data from the evaluation support this decision.

A. Data Analysis

As required in the Instructions for the Indicator/Measurement, in its FFYs 2021 through 2025 SPP/APR, the State must report data for that specific FFY (expressed as actual numbers and percentages) that are aligned with the SiMR. The State must report on whether the State met its target. In addition, the State may report on any additional data (e.g., progress monitoring data) that were collected and analyzed that would suggest progress toward the SiMR. States using a subset of the population from the indicator (e.g., a sample, cohort model) should describe how data are collected and analyzed for the SiMR if that was not described in Phase I or Phase II of the SSIP.

B. Phase III Implementation, Analysis and Evaluation

The State must provide a narrative or graphic representation, e.g., a logic model, of the principal activities, measures and outcomes that were implemented since the State's last SSIP submission (i.e., Feb 2022). The evaluation should align with the theory of action described in Phase I and the evaluation plan described in Phase II. The State must describe any changes to the activities, strategies, or timelines described in Phase II and include a rationale or justification for the changes. If the State intends to continue implementing the SSIP without modifications, the State must describe how the data from the evaluation support this decision.

The State must summarize the infrastructure improvement strategies that were implemented, and the short-term outcomes achieved, including the measures or rationale used by the State and stakeholders to assess and communicate achievement. Relate short-term outcomes to one or more areas of a systems framework (e.g., governance, data, finance, accountability/monitoring, quality standards, professional development and/or technical assistance) and explain how these strategies support system change and are necessary for: (a) achievement of the SiMR; (b) sustainability of systems improvement efforts; and/or (c) scale-up. The State must describe the next steps for each infrastructure improvement strategy and the anticipated outcomes to be attained during the next fiscal year (e.g., for the FFY 2021 APR, report on anticipated outcomes to be obtained during FFY 2022, i.e., July 1, 2022-June 30, 2023for the FFY 2021 APR, report on anticipated outcomes to be obtained during FFY 2022, i.e., July 1, 2022-June 30, 2023.).

The State must summarize the specific evidence-based practices that were implemented and the strategies or activities that supported their selection and ensured their use with fidelity. Describe how the evidence-based practices, and activities or strategies that support their use, are intended to impact the SiMR by changing program/district policies, procedures, and/or practices, teacher/provider practices (i.e., behaviors), parent/caregiver outcomes,

and/or child outcomes. Describe any additional data (i.e., progress monitoring data) that was collected to support the on-going use of the evidence-based practices and inform decision-making for the next year of SSIP implementation.

C. Stakeholder Engagement

The State must describe the specific strategies implemented to engage stakeholders in key improvement efforts and how the State addressed concerns, if any, raised by stakeholders through its engagement activities.

Additional Implementation Activities

The State should identify any activities not already described that it intends to implement in the next fiscal year (e.g., for the FFY 2021 APR, report on activities it intends to implement in FFY 2022, i.e., July 1, 2022-June 30, 2023for the FFY 2021 APR, report on activities it intends to implement in FFY 2022, i.e., July 1, 2022-June 30, 2023)) including a timeline, anticipated data collection and measures, and expected outcomes that are related to the SiMR. The State should describe any newly identified barriers and include steps to address these barriers.

17 - Indicator Data

Section A: Data Analysis

What is the State-identified Measurable Result (SiMR)?

The number and percent of American Indian students with disabilities who successfully complete their secondary education will increase.

Has the SiMR changed since the last SSIP submission? (yes/no)

NO

Is the State using a subset of the population from the indicator (e.g., a sample, cohort model)? (yes/no)

YES

Provide a description of the subset of the population from the indicator.

District selection was based on established relationships with the SEA and/or they were already a MT SSIP participating site. Work continued with four LEAs on the Fort Peck Reservation, and one LEA on the Fort Belknap Reservation, as described in the FFY2020 SSIP report. One LEA on the Confederated Salish and Kootenai Reservation was added at the beginning of the 2022-2023 school year.

Is the State's theory of action new or revised since the previous submission? (yes/no)

NO

Please provide a link to the current theory of action.

https://opi.mt.gov/Portals/182/Page Files/Special Education/Annual Performance Report/MT_ToA_ FINAL.pdf?ver=2021-12-02-090633-033

Progress toward the SiMR

Please provide the data for the specific FFY listed below (expressed as actual number and percentages).

Select yes if the State uses two targets for measurement. (yes/no)

NO

Historical Data

Baseline Year	Baseline Data	
2013	63.50%	

Targets

FFY	2021	2022	2023	2024	2025
Target>	68.60%	68.70%	68.80%	68.90%	69.00%

FFY 2021 SPP/APR Data

Number of American Indian Special Education High School Completers	Number of American Indian Special Education High School Students eligible to complete in 2020-2021	FFY 2020 Data	FFY 2021 Target	FFY 2021 Data	Status	Slippage
155	215	72.30%	68.60%	72.09%	Met target	No Slippage

Provide the data source for the FFY 2021 data.

The data for the FFY2021 Data came from the Graduation/Dropout certification taken in Fall 2021. This certification is done within Montana's statewide student information system.

Please describe how data are collected and analyzed for the SiMR.

Data are collected within the statewide student information system and certified to the OPI through the Graduation/Dropout certification. Data is verified and analyzed by the Data Operations team of OPI.

Optional: Has the State collected additional data (i.e., benchmark, CQI, survey) that demonstrates progress toward the SiMR? (yes/no) NO

Did the State identify any general data quality concerns, unrelated to COVID-19, that affected progress toward the SiMR during the reporting period? (yes/no)

NΩ

Did the State identify any data quality concerns directly related to the COVID-19 pandemic during the reporting period? (yes/no)

Section B: Implementation, Analysis and Evaluation

Please provide a link to the State's current evaluation plan.

https://opi.mt.gov/Portals/182/Page Files/Special Education/Annual Performance Report/Evaluation Questions FINAL 3-26-2020.pdf?ver=2021-12-02-090632-053

Is the State's evaluation plan new or revised since the previous submission? (yes/no)

NC

Provide a summary of each infrastructure improvement strategy implemented in the reporting period:

As outlined in the Logic Model submitted with the April 2020 SSIP, the Infrastructure Improvement Strategies that Montana has continued to emphasis are to:

-Develop and Utilize Interagency Coordination & Communication Model. Coordination efforts include Tribal Consultation and the Critical Friends Network.

Through the Critical Friends Network, educators have focused on implementing evidence-based strategies through a network community. The Critical Friends' Network (CFN), developed by the SEA, started with the NE Region in March of 2021. The NE Region is comprised of the following schools—Wolf Point, Frazer, Poplar, Brockton (all within the Fort Peck Reservation), and Hays/Lodge Pole (within the Fort Belknap Reservation). In October of 2022, a district in the Western region became a Montana SSIP site, Ronan School District. The Critical Friends' Network is based on the premise that professional development offered through a Professional Learning Community (PLC) or Personalized Learning Network (PLN) provides the reciprocity for educators to share and learn strategies to support their students with special needs. The Critical Friends Network is based on the work of Desimone's (2009) "five features of effective professional development: content focus (studying subject matter); active learning (observing, reviewing, discussing); coherence (demonstrating consistency with knowledge, beliefs, policies, and reforms); duration (engaging in 20 or more hours of contact time spread over a semester); and collective participation (interacting and conversing with colleagues)." (Rock, 2019)

Rock, M. (2019). The eCoaching Continuum for Educators: Using Technology to Enrich Professional; Development and Improve Student Outcomes. Alexandria, VA: ASCD.

Tribal consultation for district and school leaders has expanded engagement efforts to ensure students, families, communities, and tribal councils are invested partners in increasing the completion rates of tribal youth with disabilities. The SSIP/Tribal Consultation partnership continued through this cycle and expanded by establishing the Knowledge Keepers of Indigenous Nations (KKIN) Committee. The KKIN committee represents cultural elders and knowledge keepers from every tribal nation in Montana. The KKIN is providing guidance to build sustainable sources of indigenous knowledge that inform our public education system to re-root and revitalize our tribal youth in positive self-identity. Additional tribal consultation events include tribal leaders, tribal education departments, tribal colleges, youth leaders, and tribal knowledge keepers. The purpose of the consultation is to gain a deeper understanding of traditional Indigenous ways and empower staff at our schools on or near our Montana American Indian Reservations to incorporate the local resources of our tribal communities into the work with tribal youth.

-Create American Indian Task Force

The American Indian Task Force meets monthly. This is a long-standing Task Force within the OPI. The SSIP Implementation Specialist is a member of this group. OPI's American Indian Taskforce purpose is to develop strategic and aligned plans on how all stakeholders within the state of Montana work with American Indian students to promote success and wellbeing in their lives. The AISA taskforce has two goals:

-Develop a Framework that guides districts on how to structure education that fits American Indian learners, one that is focusing on the whole child, and includes building self-identity and building on the strengths and values of the Indigenous people and their culture.

-Develop an agency plan on how we use American Indian student data to monitor that the work we are doing with American Indian students is successful and closes the opportunity gap.

-Utilize Differentiated Monitoring Process

The OPI has participated in the NCSI RBAS Collaborative since its inception as a part of the first NCSI grant. Through this work, the OPI has refined a Differentiated Monitoring Process. The process is being completed by Special Education staff.

Describe the short-term or intermediate outcomes achieved for each infrastructure improvement strategy during the reporting period including the measures or rationale used by the State and stakeholders to assess and communicate achievement. Please relate short-term outcomes to one or more areas of a systems framework (e.g., governance, data, finance, accountability/monitoring, quality standards, professional development and/or technical assistance) and explain how these strategies support system change and are necessary for: (a) achievement of the SiMR; (b) sustainability of systems improvement efforts; and/or (c) scale-up.

The short term and intermediate outcomes that support achievement of the SiMR and sustainability of system improvement efforts are described below.

Short Term Outcomes Achieved:

- 1. Deeper level understanding of the value and significance of American Indian student voice
- 2. Professional approaches implemented in educator practices of using evidence-based strategies to sustain and improve curriculum delivery
- 3. Increased opportunities for professional development and technical assistance to support school leaders and educators to implement evidence-based strategies that improve student outcomes, such as high school completion rates.
- 4. Summer Institute: During the Summer Institute held on June 20-24, 2022, the following sessions were offered. This is not an inclusive list, just an example of the sessions that support the SSIP Implementation in Montana. The number of participants and feedback on the session content and active learning based on a 5-point rubric (5-strongly agree, 4-agree, 3-Neutral, 2-Disagree, and 1- Strongly Disagree) are noted.
- a. Tribal Elders and Youth Panel: Youth Like to Run, Our Elders Know the Path (Session Content 4.59, Active Learning 4.19, Participants 249)
- b. Creating a Culture of Connection with Restorative Practices (Session Content 5.0, Active Learning 5.0, Attendance 30)
- c. Data Equipped and Data Informed: The Montana Early Warning System (Session Content 4.86, Active Learning 4.0, Attendance 21)
- d. Promoting Progress for Students with Disabilities through Development and Implementation of High Quality Educational Programming (Session Content-4.69, Active Learning 4.63, Participants-26).
- e. Check and Connect (Session Content-4.91, Active Learning-4.73, Participants-22)
- f. Check in Check Out, Check it Out! (Session Content-4.70, Active Learning-4.1, Participants-46)
- g. Increase Graduation Rates by Implementing the Montana Early Warning System (Session Content-5.0, Active Learning-5.0, Participants-8)
- h. Engaging Youth Voice Elementary (Session content 4.75, Active Learning 4.75, Participants 19)
- i. The complete list of sessions can be found on the OPI website at

https://opi.mt.gov/Portals/182/Page%20Files/Summer%20Institute/OPI%202022%20Session%20Evaluations%20Final%20ADA.pdf?ver=2022-08-04-085741-587

- 5. High School Forum: Held a one-day forum on November 16, 2021, where sessions were held to increase capacity of educators to support high school students with disabilities.
- 6. Teacher Learning Hub: Courses available on the Hub to support increasing the capacity of educators to implement and apply evidence-based approaches.
- a. Sped Series: Writing Transition IEPs (4 PDUs)
- b. Rural and Tribal Strength Based Approaches Part 1 (2 PDUs)
- c. Rural and Tribal Strength Based Approaches Part 2 (3 PDUs)

Intermediate Outcomes Achieved:

- 1. Affirmation of distinct cultural values within the American Indian community.
- 2. Development of trusting relationships between LEAs and the SEA.
- 3. Connections between educators, students & families, and educational preparation program partners.
- 4. Develop understanding of the vast, distinct cultural values of Montana's American Indian people and communities.
- 5. Use of technology and connections to provide opportunities for extended learning in standards-based curriculum and supplemental learning opportunities.
- 6. Continuance of Tribal Consultation meetings via virtual platforms and in person with tribal nations.

Did the State implement any <u>new</u> (newly identified) infrastructure improvement strategies during the reporting period? (yes/no)

Provide a summary of the next steps for each infrastructure improvement strategy and the anticipated outcomes to be attained during the next reporting period.

The partnership of the SSIP Implementation Specialist and the Tribal Resiliency and Relations Unit (TRRU) team continues to provide supports to key stakeholders. These supports allow the interagency stakeholders to incorporate the local resources of tribal communities into educational programs for students. Supports include:

- 1. Tribal consultation and partnerships provide learning for stakeholders.
- 2. Increasing the capacity of Montana tribal leaders, knowledge keepers, LEA leadership, and students to understand and use data to make informed decisions for American Indian students with disabilities.
- 3. Continue to provide training opportunities that develop cultural perspectives of historical Indigenous Restorative Justice practice efforts
- 4. Continued development of Professional Learning Communities (PLC) and Personalized Learning Networks (PLN) that seek to build and strengthen the capacity of special education teachers to meet the needs of students.
- 5. Through collaboration and communication infrastructure efforts, build awareness and the need to empower American Indian students to reconnect to their identity as they see themselves reflected in their communities.

List the selected evidence-based practices implement in the reporting period:

Professional Learning Community (PLC) or Personalized Learning Network (PLN)

Provide a summary of each evidence-based practices.

Montana utilizes a PLC combined with a PLN approach to their work with the SSIP target schools. The identified PLC/PLN was developed by the SEA based on research from Rock in his The eCoaching Continuum for Educators: Using Technology to Enrich Professional Development and Improve Students Outcomes (2019). Montana has called their PLC/PLN the Critical Friends' Network (CFN). The Critical Friends' Network is based on the premise that professional development offered through a PLC or PLN provides the reciprocity for educators to share and learn strategies to support their students with special needs.

The CFN started in March of 2021, working with the following LEAs—Wolf Point, Frazer, Poplar, Brockton (all within the Fort Peck Reservation), Hays/Lodge Pole (within the Fort Belknap Reservation). The CFN for the 2021-2022 school year was comprised of the same LEAs. For the 2022-2023 school year, one additional LEA (located on the Confederated Salish and Kootenai Reservation) has been added.

Provide a summary of how each evidence-based practice and activities or strategies that support its use, is intended to impact the SiMR by changing program/district policies, procedures, and/or practices, teacher/provider practices (e.g. behaviors), parent/caregiver outcomes, and/or child /outcomes.

The CFN will enhance the capacity of educators to utilize high impact strategies, practices and interventions. This will increase educator effectiveness to improve teaching and learning strategies.

This includes improved intentional planning of culturally relevant curriculum, instructional practices, use of formative and summative data to guide instruction, and building pathways to post-secondary readiness. Ultimately, these LEAs will have schoolwide practices, teaching, and learning that are responsive to students needs and culture, leading to increased completion rates of American Indian students with disabilities.

The CFN will also strengthen the capacity of educators to cultivate and maintain positive, inclusive, safe, empowering school environments. It will emphasize the importance of elevating student voice, youth leadership and advocacy, as well as promote the use of MTSS to ensure the school structure addresses the needs of American Indian students with disabilities. This will enable educators to utilize restorative approaches to build strong relationships and learning environments. The CFN will help students have improved attendance rates, participation in school activities, reduce discipline rates. Ultimately educators will have a systematic approach to identify students at risk of dropping out of school, applying targeted interventions based on student needs and tracking interventions over time to determine if they are working.

Describe the data collected to monitor fidelity of implementation and to assess practice change.

The following data sets are being utilized to monitor the fidelity of implementation of the CFN:

Rubrics were developed for use with both the Critical Friends' Network(s) and the Tribal Consultation process (per individual tribal group involved). The rubrics are identical in nature just adjusted to fit the applicable activity. The rubrics are an adaptation from Killion's (2008) book, Assessing Impact: Evaluating Staff Development (2nd Ed.). Rubric selection is based on the following criteria:

1) it is a continuum of growth; 2) doesn't require administering on a regular basis but at random check points; 3) demonstrates a partnership in the process as well as an opt out; 4) and it is qualitative in nature staying clear of quantifying professional relationships and growing together to better serve students. This is the second year of implementation of the surveys, however during FFY2021, only 1 survey of 8 distributed was completed and returned. This does not allow Montana to report any data on the fidelity of implementation of the CFN as the response rate is too low to infer the effectiveness of this practice.

Reference:

Killion, J. (2008). Assessing Impact: Evaluating Staff Development (2nd Ed.). Thousand Oaks, CA: Corwin Press.

Describe any additional data (e.g. progress monitoring) that was collected that supports the decision to continue the ongoing use of each evidence-based practice.

No additional data was collected.

Provide a summary of the next steps for each evidence-based practices and the anticipated outcomes to be attained during the next reporting period.

The SEA plans to use the next steps during the next reporting period:

- 1. Expand outreach beginning in the fall of 2022 with the addition of a school in our Western region to the CFN.
- 2. The focus of the CFN will be realigned to build capacity with the LEAs as described above.
- 3. Will continue to strengthen and utilize Tribal consultations for district and school leaders to expand engagement efforts to ensure students, families, communities and tribal councils are invested partners in increasing the completion rates of American Indian students with disabilities. I
- 4. Continue to utilize and align the SSIP work with the American Indian Task Force
- 5. Work towards implementation of the differentiated monitoring process to help the SEA and LEAs use the data from the monitoring process to determine next steps aligned to the SiMR.

Does the State intend to continue implementing the SSIP without modifications? (yes/no)

YES

If yes, describe how evaluation data support the decision to implement without any modifications to the SSIP.

Using the data collected to monitor fidelity of implementation, the SEA has determined to continue implementing the SSIP without modifications. Prior to adjusting the strategies, the SEA must first strengthen the evaluation tools, the dissemination of those tools to increase response rates, and develop opportunities for review of the data to determine if the strategies are working as implemented.

Section C: Stakeholder Engagement

Description of Stakeholder Input

Discussions and Stakeholder input of the State's Performance Plan (SPP), Annual Performance Report (APR), State's Systemic Improvement Plan (SSIP), and Results Driven Accountability (RDA)/Results Based Accountability (RBA) began in 2013 with our State Special Education Advisory Panel. The Panel is fully vested and broadly representative of Montana. Additionally, many of the panel members as well as SEA staff serve in other agency or organization leadership positions or on advisory groups in the disability community. This enables MT to draw insight and advice from a broad group of stakeholders with an understanding of Montana's unique needs, strengths, and potential weaknesses.

Other stakeholder groups we sponsor and/or engage include:

- --Our Comprehensive System of Personnel Development (CSPD) includes both regional and state councils that regularly meet to assess APR data and to evaluate professional development priorities and results.
- --The OPI staff has developed productive working relationships with other Montana agencies that serve youth and adults with disabilities. OPI staff participate as members of advisory councils for early childhood, vocational rehabilitation, juvenile justice, developmental disabilities, the state independent living council and the mental health divisions of the DPHHS. These connections have allowed the OPI staff to build strong working relationships with other agencies, which has resulted in multiple collaborative projects that have strengthened the commitments of all involved to working with Montana's youth to facilitate smooth transitions from birth to adulthood.
- --Working with staff from TAESE, the OPI has facilitated the Montana Higher Education Consortium (HEC) for twenty years. The HEC continues to be a part of CSPD and brings together members of faculty from each of the colleges and universities teacher prep programs in Montana. Participation in the

consortium is strong and includes faculty members from each of the public and private colleges in Montana. This group has worked to provide greater standardization of the teacher training programs in Montana and has worked together to improve pre-service training programs.

--The OPI staff is also engaged with the Schools Administrators of Montana (SAM) which include affiliates for Superintendents, Principals, Special Education Administrators, and Information Technology (IT) Directors. This partnership allows us to respond quickly to needs expressed in the field by school staff. We also provide SAM with a grant to help fund the Montana Recruitment Project. This program focuses on recruiting hard to fill positions such as speech/language pathologists, special education teachers, occupational therapists, and school psychologists for our districts throughout Montana.

Annually, the State Education Agency (SEA) brings together representatives from these stakeholder groups for a joint meeting facilitated by TAESE. This meeting gathers over 80 front-line stakeholders together to share up-dates of issues and gather input from a comprehensive representation of the Montana disability community, families and parents of children and students with and without disabilities. For the past seven years, the topic has been Montana's SSIP and activities have been conducted to solicit both general and specific stakeholder input. During the spring 2022 meeting, the state presented on using data within the state for Local Education Agencies (LEAs) to make decisions. This also included how to interpret the APR data.

Describe the specific strategies implemented to engage stakeholders in key improvement efforts.

The SSIP Implementation Specialist used a Professional Learning Community (PLC) or Personalized Learning Network (PLN) in the form of a Critical Friends Network to engage stakeholders.

Were there any concerns expressed by stakeholders during engagement activities? (yes/no)

NO

Additional Implementation Activities

List any activities not already described that the State intends to implement in the next fiscal year that are related to the SiMR.

Provide a timeline, anticipated data collection and measures, and expected outcomes for these activities that are related to the SiMR.

Describe any newly identified barriers and include steps to address these barriers.

Provide additional information about this indicator (optional).

17 - Prior FFY Required Actions

None

17 - OSEP Response

17 - Required Actions