



May 6, 2026

Sent via US Mail and/or SMFTS

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THIS DOCUMENT CONTAINS CONFIDENTIAL INFORMATION

RE: FINAL REPORT for In the Matter of [REDACTED] 2026-04, Alleged Violations of the Individuals with Disabilities Education Act (IDEA).

This is the Final Report pertaining to the above-referenced state special education complaint (Complaint) filed pursuant to the Administrative Rules of Montana (ARM) 10.16.3662. [REDACTED] (Parent) filed the Complaint on behalf of her child [REDACTED] (Student), a fifth grader at [REDACTED] Elementary School (School) in the [REDACTED] Public Schools (District). Parent alleges the District violated the Individuals with Disabilities Education Improvement Act (IDEA), 20 U.S.C. 1400 et seq., Montana special education laws, Title 20, Ch. 7, Montana Code Annotated (MCA), and corresponding regulation at 34 CFR Part 300 and ARM 10.16.3007 et seq. The Parent alleged the following:

Issue 1. Whether the District denied Student a Free Appropriate Public Education (FAPE) by:

- a. Failing to implement Student's IEP in the general education setting; and
- b. Failing to implement the behavioral supports in Student's IEP during school and on the bus.

Issue 2. Whether the District improperly used physical restraint and failed to inform

Parent of the use of an aversive treatment procedure in violation of ARM 10.16.3346.

Procedural History

1. The Office of Public Instruction (OPI) Dispute Resolution Office received the signed Complaint filed by the Parent on March 9, 2026.
2. The OPI Dispute Resolution Office contacted the District on March 10, 2026, and the District received a copy of the Complaint, as required by the Code of Federal Regulations (CFR) 34 CFR 300.153(d) and Administrative Rules of Montana (ARM) 10.16.3662(3).
3. The OPI Dispute Resolution Office issued a Notice of Filing on March 12, 2026, to the District and Parent.
4. After the Notice of Filing, Request for District Response, Scope of Proceedings, and Appointment of Investigator was issued on March 16, 2026, it was noted that Parent requested to proceed with the complaint process and declined participation in the EAP process and informal resolution.
5. The District requested an extension of time to file its written response on March 26, 2026. OPI issued an Extension of Time to File District Written Response on March 27, 2026, extending the timeframe for the District to submit its written response to March 31, 2026.
6. The District submitted a written response to the issues in the Complaint on March 31, 2026.
7. No additional written response was received from the Parent.

Investigatory Process

The investigator reviewed the following records:

- The original letter of Complaint and all supporting documentation;
- The District's original response to the Complaint and all exhibits; and
- The education records relevant to this investigation.

The investigator interviewed the Parent via phone on April 9, 2026.

The investigator interviewed the Special Education Teacher, School Principal, PE/Health Teacher, and Music Teacher, individually and with District's legal counsel and District's Director of Student Services present via Zoom on April 17, 2026.

The OPI provided the Parent and the District the opportunity to submit additional information for consideration during the complaint investigation.

Applicable Federal Regulations, State Statutes or Rules:

34 CFR 300.1	Purpose of IDEA
34 CFR 300.17	Free Appropriate Public Education
34 CFR 300.101	Free Appropriate Public Education
34 CFR 300.114	LRE Requirements
34 CFR 300.116	Placements
34 CFR 300.117	Nonacademic Settings
34 CFR 300.320	Definition of individualized education program
34 CFR 300.323	When IEPs must be in effect
34 CFR 300.324	Development, review and revision of IEP
ARM 10.16.3346	Aversive Treatment Procedures
MCA 20-4-302	Discipline and Punishment of Pupils

Relevant Time Period for Investigation

Pursuant to 34 CFR 300.153(c) and ARM 10.16.3662(2)(a), the OPI has the authority to investigate alleged violations of IDEA and Montana special education laws that occurred within one year prior to the date the complaint was filed. In accordance with this limitation, the investigation and any findings of noncompliance will be limited to the period of time commencing March 9, 2025, through March 9, 2026. Additional information beyond this timeframe was considered for the purpose of fully investigating the complaint.

Findings of Fact

1. The Student is currently in the fifth grade and is a learner eligible for services under the IDEA category of Autism. *District Response (p. 1)*.
2. The Student's IEP in effect at the start of the 2025-26 school year was dated May 14, 2025. Relevant information from the IEP includes:
 - a. Educational concerns included academics, independence, and behavior. Under special factors, it was noted that the Student's behaviors impede their learning or that of others.
 - b. Annual goals were included to address math, reading, written expression, self-help/independence, and social/emotional/behavioral needs.

- c. The Student was to receive a total of 1,100 minutes of special education services with only 15 of those minutes provided in the regular education setting. Specifically, special education services included:
 - i. Social/Emotional/Behavior: 215 minutes/week (special education setting) and 15 minutes/week (regular education setting)
 - ii. Self-Help/Independence: 120 minutes/week (special education setting)
 - iii. Reading: 300 minutes/week (special education setting)
 - iv. Written Expression: 150 minutes/week (special education setting)
 - v. Math: 300 minutes/week (special education setting)
- d. The Student's least restrictive environment (LRE) was described as a specialized classroom for functional life skills with a modified curriculum. Elsewhere in the IEP, it indicates that Student is in a self-contained classroom.
- e. Supplementary aids and services included, in part: positive reinforcement; access to a calm-down area with tools; a positive reinforcement system tied to IEP goals; pre-correction and scripted routines from transitions, group activities, and sensory breaks; one-on-one staffing when behavior occurs; one-on-one deescalation; a crisis intervention protocol when the Student becomes dysregulated; and an aversive treatment plan.

District Response (p. 1-16).

- 3. The IEP Notes attached to the IEP dated May 14, 2025, indicated that the Parent expressed that they would like the Student to be pushed into the regular setting. The Notes further state, to ensure a successful transition, the IEP Team proposed to start with 15 minutes in a preferred class in the regular education classroom to monitor the Student's comfort, engagement, and ability to participate. With success, the Student's time in the regular education classroom would gradually increase. *District Response (p. 18).* The Special Education Teacher indicated that the 15 minutes of specially designed instruction to be provided in the regular education setting was intended to represent the 15 minutes referenced in the IEP Notes and was the minimum commitment for inclusion. *Interview with Special Education Teacher.*
- 4. On September 2, 2025, the Special Education Teacher told the Parent that art and music were going to be held in the special education classroom. In response, the Parent indicated that the Student was supposed to be attending specials with their non-disabled peers and

stated the Student's integration in the general education setting would need to be "re-evaluated." The Special Education Teacher then clarified that the Student would attend physical education (PE) and health with their non-disabled peers. The Parent expressed frustration. Internally, the Special Education Teacher stated in an email that the IEP included 15 minutes/week in the regular education setting, for a total of 120 minutes/week in the general education setting. *District Response (p. 125)*. The Special Education Teacher clarified that the initial plan was for the Student to attend PE/health in the regular education setting; PE/health is held for 120 minutes/week. *Interview with Special Education Teacher*.

5. Following this correspondence, the Parent spoke with the School Principal; the conversation was memorialized in an email dated September 3, 2025. Specifically, the School Principal stated, effective immediately, the Student was to push into the fifth-grade morning meeting, music, PE/health, and art classes. The Student was to remain in those classes for as long as appropriate for the purpose of integrating them and establishing a routine in the regular education setting. The Student was also to attend music and art in the special education classroom. *District Response (p. 126)*.
6. The Special Education Teacher reported that the Student attended morning meeting in the fifth-grade classroom for the first few weeks; however, the General Education Teacher stopped doing morning meeting so the Student stopped attending. *Interview with Special Education Teacher*. In addition, the Special Education Teacher reported that the Student attended art, music, and PE/health with the fifth-grade class following the directive from the School Principal. Since then, the Student has attended music and PE/health consistently and regularly. *Interview with Special Education Teacher; Interview with PE/Health Teacher; Interview with Music Teacher*. However, after repeated difficulties maintaining emotional and behavioral regulation during art in the fifth-grade classroom, beginning sometime in January 2026, the Student no longer was pushed-in for art, instead attending art only in the special education setting. *Interview with Special Education Teacher*. Also in January 2026, the Student began attending library and counseling in or with the fifth-grade class. *Id.* The Special Education Teacher reported that the Student does not attend lunch or recess with the fifth-grade general education class. *Id.*
7. The school week consists of approximately 1,845 instructional minutes and 220 non-instructional minutes (i.e., lunch, recess), for a total of 2,065 minutes per week. *Master*

Schedule. Between September and December 2025, the Student was, at minimum, pushed into the regular education class approximately 180 minutes/week to attend PE/health and music. *Interview with Special Education Teacher; Interview with PE/Health Teacher; Interview with Music Teacher*.

8. Since January 2026, the Student has continued to attend the regular education classroom to attend PE/health and music and has also attended library and counseling with the fifth-grade class. *Interview with Special Education Teacher*. Library is held for 60 minutes/week and counseling is held for approximately 60 minutes/month. *Master Schedule*. The Special Education Teacher reports the Student is attending library and counseling in or with the fifth-grade class consistently and regularly. *Interview with Special Education Teacher*. In total, presently, the Student is in the regular education setting, on average, for 270 minutes/week.
9. Also in effect at the start of the 2025-26 school year was a behavior intervention plan (BIP) dated May 12, 2025. The identified target behaviors included task avoidance, disruptive peer interaction, and emotional outbursts during transitions or periods of perceived overwhelm. The hypothesized function of emotional outbursts was self-regulation challenges, including responding to emotional or sensory overload. Preventative strategies included, in part, a visual schedule, pre-correction, clear expectations, and a check-in system. Consequence strategies included, in part, positive reinforcement, redirection, and planned ignoring for low-level disruptions. Also included was how to respond to certain behaviors, categorized by the level of disruption. For example, during mild disruptions, staff were to utilize planned ignoring, when appropriate; provide positive redirection; and offer choices. During escalated behaviors (e.g., yelling), staff were to use a calm, firm tone; prompt the Student to take a break; reduce demands; and guide the Student to a regulation strategy. The crisis management plan indicates that when the Student escalates, staff were to use a calm, neutral tone and brief directive language; offer a break or use a visual prompt to transition to a clam space; follow the school crisis protocol; and debrief with the Student after the incident. *District Response (p. 25-30)*. The School Principal indicated the Student's specific behavior plan was the crisis protocol to be followed. *Interview with School Principal*.
10. The Aversive Treatment Plan is dated May 15, 2025, and includes isolation time-out and physical restraint as permitted aversive treatment procedures. Physical restraint was to be

used as a last resort and only after isolation time-out was utilized. Physical restraint is described as placing hands on the Student in a manner that is reasonable and necessary to protect the Student from physical injury or provide staff self-protection. Physical restraint was only to be utilized by staff trained in Crisis Prevention Institute (CPI). *District Response* (p. 31-35).

11. The Parent expressed concern about how an incident on February 18, 2026, was handled. Specifically, Student forgot their water bottle after being dismissed for the day and realized it was missing as the Student was getting on the bus. *District Response* (p. 96); *Interview with School Principal*. The Student is responsible for packing their backpack prior to dismissal. *Interview with Special Education Teacher*. Staff did not retrieve the water bottle before the bus departed. *Interview with School Principal; Interview with Parent*. According to the bus driver, the Student argued with a teacher prior to boarding the bus; however, there are no details regarding the nature of that interaction. *District Response* (p. 95). The Student became dysregulated, and, while on the bus, was yelling, got out of their seat, and hit a peer. *Id.* The Student was written up for the incident; however, the write-up was subsequently removed from the Student's record on or around March 9, 2026. *Id.*
12. The Parent also expressed concern regarding an incident on February 23, 2026. Class Dojo correspondence indicates that, on that day, the Student was physically aggressive towards a peer at recess. *District Response* (p. 141); *District's Response to the Complaint*. In an attempt to reduce the risk of injury to either student, staff attempted to position themselves between the students but were unable to do so, so staff attempted to grab the Student's shoulder. *District Response* (p. 79); *District's Response to the Complaint; Interview with the Special Education Teacher; Interview with the School Principal*. A staff member missed the Student's shoulder and their hand got caught in the Student's hood causing it to rip. *District Response* (p. 79; 141); *District's Response to the Complaint*. Reportedly, the situation deescalated quickly and the Student returned to class shortly thereafter. *Interview with the Special Education Teacher*.
13. The Parent expressed concern regarding an incident on March 3, 2026, in which the Student was reportedly scratched by a peer. The Parent was informed of the incident that evening; the Parent suggested the two students be separated, as there was ongoing conflict with the other student. *District Response* (p. 89-90).

Analysis and Conclusions

Issue 1. Whether the District denied Student a Free Appropriate Public Education (FAPE) by:

- a. Failing to implement Student's IEP in the general education setting; and**
- b. Failing to implement the behavioral supports in Student's IEP during school and on the bus.**

1. The overarching purpose of the IDEA is to ensure that an eligible student with a disability has a FAPE available to them, including special education and related services that meet the unique needs of individual students. 34 CFR 300.1.
2. The IDEA defines FAPE as special education and related services that are: (a) provided at public expense, under public supervision and direction, and without charge; (b) meet the standards of the state education agency, including the requirements of this part; (c) include an appropriate preschool, elementary school, or secondary school education in the State involved; and (d) are provided in conformity with an IEP that meets the requirements of 34 CFR §§ 300.320 through 300.324. 34 CFR 300.17.
3. For each student eligible under the IDEA, it is the obligation of the district to convene an IEP team meeting to develop an IEP, an *individualized* education program, designed to meet the student's needs that is developed, reviewed and revised in accordance with 34 CFR 300.320 through 300.324. 34 CFR 300.320(a) (emphasis added). A student's IEP team makes the determination as to what aids, services, modifications or supports are necessary and which of those must be included in the IEP.
4. As soon as possible following the development of an IEP, special education and related services are to be made available to the student. 34 CFR 300.323(c)(2). Public agencies must then implement the IEP as written for the student, including all required components. 34 CFR 300.17(d).
5. When looking at whether a public agency's failure to implement the IEP denies a student FAPE, the United States Ninth Circuit Court of Appeals in *Van Duyn v. Baker School District*, 502 F.3d 811, 47 IDELR 182, *amended* (9th Cir. 2007), adopted the materiality standard. If a material failure to implement the IEP is found, it may be considered a denial of FAPE. "A material failure occurs when there is more than a

minor discrepancy between the services a school provides to a disabled child and the services required by the child's IEP.” *Van Duyn*, 502 F.3d at 822.

Implementation in General Education Setting

6. To the maximum extent appropriate, children with disabilities must be educated with children who are not disabled. The LRE provisions express a strong preference for educating children with disabilities along with their typically developing peers. A child's removal from the general education setting is permissible, and may be required, when a child cannot be educated satisfactorily in the regular education environment. 34 CFR 300.114(a).
7. The LRE requirements also apply to nonacademic settings. Children with disabilities must participate in nonacademic settings, including meals and recess, with nondisabled peers to the maximum extent appropriate for the needs of that child. The public agency must ensure that each child with a disability has the supplementary aids and services determined by the child's IEP team to be appropriate and necessary for them to participate in nonacademic settings. 34 CFR 300.117. The "... 'regular educational environment' encompasses regular classrooms and other settings in schools such as playgrounds in which children without disabilities participate." 71 Fed. Reg. 46,585 (Aug. 14, 2006).
8. Under the IDEA, a district must ensure that the educational placement of a child with a disability is made by a group of individuals who are knowledgeable about the child, the meaning of the evaluation data, and the placement options. The educational placement must also be based on the IEP and be the child's least restrictive environment. 34 CFR 300.116.
9. The IEP must include an explanation of the extent, if any, to which the child will not participate with nondisabled peers in the regular class and activities. 34 CFR 300.320(a)(5).
10. The parent and district may amend the IEP without convening an IEP team meeting so long as they "develop a written document to amend or modify the child's current IEP" and inform the IEP team of those changes. 34 CFR 300.324(a)(4).
11. Here, the IEP indicates that the Student's placement is a self-contained setting with 1,100 minutes per week of special education services, only 15 minutes of which is in the regular education setting. In further evidence of this placement, Student

previously has participated in specials within the special education classroom and does not attend lunch or recess with their nondisabled peers. The IEP does not specify any additional time in general education beyond those 15 minutes, nor does it describe the Student's participation in or removal from general education classes or nonacademic activities. As written, the IEP describes the Student as being outside the general education setting for nearly the entire 1,845-minute instructional week except for those 15 minutes identified.

12. In practice, the Student has spent approximately 180-270 minutes per week in general education classes, far exceeding the 15 minutes reflected in the IEP. The decision to increase the Student's time in the general education classroom was made following a conversation between the Parent and the School Principal without convening the IEP Team or formally amending the IEP to change the Student's self-contained placement. The District did not create any written IEP amendment documenting the increased general education time or revised extent of the Student's participation with nondisabled peers, nor did it inform the entire IEP Team of those changes.

13. As a result, the Student's program, in practice, materially differs from the self-contained placement described in the IEP; this discrepancy constitutes a material failure to implement the IEP regardless of the informal agreement between Parent and School Principal. Accordingly, a violation is found.

Implementation of Behavioral Supports

14. The Parent expressed concern regarding the Student's continued interaction with a peer and how staff responded to an incident on February 18, 2026.

15. First, neither the IEP nor BIP include any provisions regarding proximity, restricted interaction, or required separation from peers that Student may have conflict with. Therefore, while there may be several incidents involving one particular peer, the Student's educational program does not require the Student to be separated from the peer. Thus, there is no implementation failure to do so.

16. Second, the BIP identifies three target behaviors, including emotional outbursts during transitions or periods of perceived overwhelm. Several interventions and supports were included, such as redirection, planned ignoring for low-level disruptions, offering choices, prompting the Student to take a break, and guiding the

Student through regulation strategies.

17. The information available reflects that, on February 18, 2026, the Student became upset upon discovering they did not have their water bottle and later escalated while on the bus, resulting in a physical altercation with a peer. The infraction report indicates the Student argued with a teacher prior to boarding the bus; however, there are no details regarding the nature of the interaction between the Student and staff or what interventions, if any, were utilized in response to the Student's behavior prior to boarding the bus.
18. Although the Parent indicated that the water bottle was not retrieved, the BIP does not require staff to fulfill such requests. The Parent also asserts that the Student should not have been permitted to board the bus while dysregulated. However, the BIP does not require staff to delay or prevent the Student from boarding the bus under such circumstances.
19. Accordingly, the record does not support a finding that the District failed to implement behavioral supports. Therefore, no violation is found.

Issue 2. Whether the District improperly used physical restraint and failed to inform Parent of the use of an aversive treatment procedure in violation of ARM 10.16.3346.

20. The IDEA does not specifically address the use of aversive treatment procedures. The U.S. Department of Education has opined that "[p]hysical restraint or seclusion should be reserved for situations or conditions where there is imminent danger of serious physical harm to the child, other children, or school or program staff." *Restraint and Seclusion: Resource Document* (US DOE, May 2012).
21. Montana law provides that "[a]versive treatment procedures may be appropriate for an individual student who exhibits behaviors which pose a risk of physical harm to the student or others, or a risk of significant damage to property, or significantly disruptive or dangerous behaviors which cannot be modified solely through the use of positive behavioral interventions. Aversive treatment procedures must be designed to address the behavioral needs of an individual student, be approved by the IEP team, and may not be used as punishment, for the convenience of staff, or as a substitute for positive behavioral interventions." ARM 10.16.3346(1).
22. IEPs may include aversive treatment procedures, physical restraint and isolation time-

outs, only when subsequent to a functional behavioral assessment:

- a. a series of no less than two written positive behavioral intervention strategies, designed to target the behavior to be changed, were previously implemented;
- b. the IEP team includes a person trained and knowledgeable about best practices in the application of positive behavioral interventions; and aversive treatment procedures and nonaversive alternatives for de-escalation; and
- c. a written behavioral intervention plan (BIP) using aversive treatment procedures is developed and incorporated as part of the IEP.

23. A BIP that includes aversive treatment procedures must be in writing and contain several criteria as set out in ARM 10.16.3346(7), which provide: (1) for exact specification of the use of the aversive treatment procedure(s); (2) close monitoring and identification of personnel responsible for monitoring and analyzing the data collected on the aversive treatment procedures; and (3) keeping parents informed of the progress. Additionally, parents must be informed no less than 24 hours after the aversive treatment procedure is implemented on their child. ARM 10.16.3346(9).

24. A person employed or engaged by a school district may use physical restraint, by placing hands on a student in a manner that is reasonable and necessary, to quell a disturbance, provide self-protection, protect the student or others from physical injury, obtain possession of a weapon or other dangerous object, maintain orderly conduct of a student, or protect property from serious harm. MCA 20-4-302(4). Additionally, an IEP team may determine that the frequency, intensity or duration of the restraint warrants an aversive treatment procedure. ARM 10.16.3346(2)(a).

25. Physical restraint is “[a] personal restriction that immobilizes or reduces the ability of a student to move his or her torso, arms, legs, or head freely.” *Restraint and Seclusion: Resource Document* (May 15, 2012, US DOE).

26. An aversive treatment plan has been implemented for the duration of the 2025-26 school year. It allows staff trained in CPI to utilize physical restraint only after first utilizing isolation time-out. A BIP has also been implemented for the 2025-26 school year. It indicates that the Student, at times, physically touches peers, including during classroom transitions. Pertinent consequence strategies include redirection.

27. On February 23, 2026, Student and a peer showed signs of a looming physical altercation. To prevent such, staff physically intervened to quell the disturbance and

protect the Student and others from physical injury. There is no indication that the physical intervention resulted in a physical restraint. Moreover, the physical intervention was permitted under MCA 20-4-302(4); therefore, no violation is found.

Disposition

Issue 1. Whether the District denied Student a Free Appropriate Public Education (FAPE) by:

a. Failing to implement Student's IEP in the general education setting.

The OPI finds a violation. The District has not implemented the identified placement.

b. Failing to implement the behavioral supports in Student's IEP during school and on the bus.

The OPI finds no violation. There is no evidence that the identified behavioral supports have not been implemented with fidelity.

Issue 2. Whether the District improperly used physical restraint and failed to inform Parent of the use of an aversive treatment procedure in violation of ARM 10.16.3346.

The OPI finds no violation. The District did not use physical restraint.

Corrective Action

It has been determined that the District is out of compliance and in violation of the IDEA. The following corrective actions are required to be completed by the District as set forth below.

1. The Student's IEP Development

- **By May 29, 2026**, the District shall convene an IEP meeting with all required members present to review the IEP and determine the following:
 - Special education services and service time based on the goals and Student's needs;
 - Whether there are any additional supplementary aids and services that can be used to enable the Student to be educated with their nondisabled peers, including in nonacademic settings;
 - Least restrictive environment including what, if any, behaviors or other areas of concern are impeding Student's access to the general education and nonacademic settings; and,

- Educational placement.
- The IEP must include a clear explanation of the extent, if any, to which the Student will not participate with nondisabled peers in the regular class and nonacademic activities.
- **By June 3, 2026**, the District shall provide the Parent with prior written notice of its offer of FAPE.
- **By June 3, 2026**, the District shall provide the following documentation to the Early Assistance Program Director:
 - The IEP Meeting Notice;
 - The fully developed and proposed IEP; and
 - The Prior Written Notice provided to the Parent.

2. Implementation of LRE

- The District must ensure that the Student's LRE as set out in the IEP is implemented as written and establish a plan or schedule that documents how this will be met.
- The District must make sure that all staff involved in implementing Student's LRE are aware of the LRE requirements set out in Student's IEP and the plan for implementation.
 - The District must submit documentation of how the above requirements will be met to the Early Assistance Director **by June 3, 2026**.

3. Required Staff Training

- The District shall provide the special education teachers and administrators at the school where Student attends with one hour of training on the LRE provisions of IDEA and IEP development as set out above under Issue 1. The District shall comply with the following conditions:
 - The training shall be conducted by a professional with expertise in determining LRE and IEP development and could include the District's Special Education Coordinator or Special Education Director. The name and credentials of the trainer shall be provided to OPI's Early Assistance Program Director by **May 29, 2026**.
 - The District must submit the training materials to OPI for approval at least **fourteen (14) days** prior to the training.

- The training shall be completed by **September 1, 2026**.
- The District shall submit evidence of completion, including sign-in sheets with the name of all participants and date(s) of training to OPI's Early Assistance Program Director **by September 4, 2026**.

Note: This Final Report is final and is not subject to appeal. ARM 10.16.3662(13). Both parties retain their right to file a due process complaint after a state complaint final report is issued on the same or different issues, provided the due process complaint meets the requirements set out in 34 CFR 300.507.

Patrick Cates

Patrick Cates, Senior Manager-Safety and Student Supports

c: Mandi Gibbs, Dispute Resolution/EAP Director (via SMFTS only)

██████████ Attorneys for the District (via SMFTS only)

██████████ District Executive Director of Student Services (via SMFTS only)