

**VIRGINIA DEPARTMENT OF EDUCATION  
DIVISION OF SPECIAL EDUCATION AND STUDENT SERVICES  
OFFICE OF DISPUTE RESOLUTION AND ADMINISTRATIVE SERVICES**

**LETTER OF FINDINGS**

<b>School Division</b> Norfolk City Public Schools 800 E. City Hall Avenue Norfolk, Virginia 23510	[REDACTED]
<b>Division Superintendent</b> Dr. Samuel T. King	[REDACTED]
<b>Special Education Director</b> Ms. Janice James-Mitchell	[REDACTED]
<b>Date Complaint Received</b> February 25, 2014	<b>Complainant (if other than parent)</b> N/A
<b>Notice of Complaint Date</b> March 4, 2014	<b>Findings Due Date</b> April 23, 2014
<b>Complaint Appeal Date</b> May 23, 2014	<b>Corrective Action Plan Due Date</b> May 23, 2014
<b>Complaints Specialist/Case Manager</b> Kathleen G. Harris	<b>Complaints Department Phone #</b> (804) 225-2013
<b>On-Site Visit Date:</b> N/A	

At the time of the complaint filing, [REDACTED] was thirteen (13) years old and eligible for special education and related services as student with the disability category of autism in Norfolk City Public Schools (NCPS). The student attended Blair Middle School (BMS) in spring 2013; in fall 2013, she did not attend BMS but received instructional services at home.

**A. Applicable Regulations**

On May 28, 2009, the Virginia Board of Education adopted revised regulations to reflect IDEA '04 and its 2006 implementing regulations. The Board's revised regulations became effective on July 7, 2009, reissued January 25, 2010, at 8 VAC 20-81-10 *et seq.* (the "Virginia Regulations"). Accordingly, this office will base its investigation and findings on the 2009 Virginia Regulations, which are applicable to the allegations forming the basis of the parent's complaint. The 2009 Virginia Regulations are available online at [http://www.doe.virginia.gov/special\\_ed/regulations/state\\_regs\\_speced\\_disability\\_va.pdf](http://www.doe.virginia.gov/special_ed/regulations/state_regs_speced_disability_va.pdf).

**B. Sufficiency of Complaint**

Prior to the issuance of the *Notice of Complaint* in this case, this office reviewed the complaint documentation and determined that it met the filing requirements of the regulations. (See 34 C.F.R. § 300.153)

**C. On-Site Visit**

Based on the complainants' supporting materials, the school division's response documentation, and additional information, this office determined that conducting an on-site visit would not have produced any more determinative facts than were presented in the written

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correspondence, and therefore, we had sufficient information to bring our investigation to closure without an on-site visit.

### ISSUE(S) AND REGULATIONS:

#### **1. Evaluation/Reevaluation/Eligibility—Evaluation/Reevaluation Procedures. Student Records—Confidentiality.**

The parent alleges that NCPS has violated special education regulations regarding evaluation procedures and confidentiality of student records with respect to her daughter, [REDACTED]

More specifically, the parent has alleged that:

- “Norfolk Public Schools and SECEP [Southeastern Regional Cooperative Educational Programs] conducted an unlawful evaluation without our knowledge or consent”;
- “[t]he Blair [Middle School] IEP team had no legitimate educational reason to invite Mr. Jacob to do an observation [on] March 4, 2013 of our child and review her records....Once I discovered that Mr. Jacob had visited Blair [sic] to review my daughter’s cumulative records, I instinctively knew he had completed an observation”;
- “Mr. Jacob directly...admitted that he had indeed completed a 40-minute observation of my child [and 30-minute record review], spoke to her teacher and spent approximately 15 minutes reviewing her records” and that, in an April 24, 2013, telephone conversation with the parent, Mr. Jacob “stated he thought NPS [NCPS] had gotten the ‘appropriate authorizations’ for him to conduct the observation”;
- “what I signed did not indicate I had agreed to an observation or cumulative record review of any kind”;
- she asked “Mr. Jacob to share the report he had prepared following his March 4, 2013 observation and although a full six weeks had lapsed between his observation and our conversation during which he confirmed he did an observation, Mr. Jacob stated that he did not prepare a written report for the Blair [sic] IEP team, instead providing a verbal report”;<sup>1</sup> and

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<sup>1</sup>As indicated in the OTHER section of the Notice of Complaint, “the parent has also alleged that ‘[n]either NPS nor SECEP followed the [SECEP evaluation] process as described in the District’s procedural manual’ which ‘indicates ‘SECEP will contact DSES after the observation is conducted and a written [emphasis added] report with recommendations is submitted to DSES and the principal’ [emphasis in original].’ School division compliance with local policies and procedures lie outside the scope of our investigative authority; accordingly, this issue will not be addressed in this Notice of Complaint.” NCPS also stated that no report was generated from the “observation.” We note, however, that the Virginia Regulations, at 8 VAC 20-81-70.D, direct school divisions to provide a copy of the completed evaluation report at no cost to the parents and that a copy of the report must be available to the parent no later than two business days before a meeting to determine eligibility.

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- “they [sic] failed to protect the confidentiality of my child’s student records which is a direct violation of IDEA statutory language.

Applicable Regulations and Other Authority:

- 34 C.F.R. § 300.15; 8 VAC 20-81-10.
- 34 C.F.R. §§ 300.303, 300.304, and 300.305; 8 VAC 20-81-60 and 70.
- 8 VAC 20-81-70.F.1.a.
- 34 C.F.R. § 300.300; 8 VAC 20-81-170.E.
- 34 C.F.R. § 300.300; 8 VAC 20-81-60.B.2, 8 VAC 20-81-70.G, and 8 VAC 20-81-170.E.1.a.
- 34 C.F.R. § 300.300(c) and (d); 8 VAC 20-81-70.G and 8 VAC 20-81-170.E.
- 34 C.F.R. § 300.9; 8 VAC 20-81-10.
- 34 C.F.R. § 300.306(a)(2); 8 VAC 20-81-70.D.
- 34 C.F.R. § 300.613; 8 VAC 20-81-170.G.
- 34 C.F.R. §§ 300.32 and 300.623; 8 VAC 20-81-170.G.10.
- 8 VAC 20-150-20 (Virginia Regulations Governing the Management of the Student's Scholastic Record in the Public Schools of Virginia).
- Va. Code § 22.1-26.

Findings:

The Office of Dispute Resolution and Administrative Services finds the school division to be in noncompliance with regard to Sub-issue 1A and in compliance on Sub-issue 1B.

Analysis:

A review of the record indicates the following chronology:

<u>Date</u>	<u>Event</u>
February 22, 2013	<ul style="list-style-type: none"><li>• IEP team meeting conducted; parent signed IEP providing for home-based services.</li><li>• Parent signed “Consent for Release of Confidential Information” for “the purpose of educational and programmatic planning,” authorizing NCPS to</li></ul>

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	provide information to SECEP.
February 25, 2013	<ul style="list-style-type: none"><li>SECEP administrator received copies of student's educational records for review.</li></ul>
March 4, 2013	<ul style="list-style-type: none"><li>SECEP administrator conducted "informal" observation of student.</li><li>SECEP administrator completed records review.<sup>2</sup></li></ul>
April 12, 2013	<ul style="list-style-type: none"><li>Parent sent e-mail correspondence to NCPS (i) requesting copy of February 22, 2013, signed release form; (ii) indicating she does not "authorize any <u>observation or evaluation</u> [emphasis added] [to] be performed on our child related to any private placement or alternative placement."</li></ul>
April 16, 2013	<ul style="list-style-type: none"><li>NCPS sent e-mail correspondence to parent indicating (i) "[n]o one from SECEP has conducted a formal observation or evaluation of [redacted]"; (ii) acceptance of parent's rescission of authorization of release of information effective April 12, 2013; (iii) completion of records review by SECEP personnel for "programmatic planning and consideration of placement on 3/4/13"; (iv) SECEP had advised it would review student's "profile to see where she can be placed, if that is an option"; and (v) lack of "findings to report" to IEP team "because the team has not discussed SECEP as a placement option at this time."</li></ul>
April 18, 2013	<ul style="list-style-type: none"><li>Parent sent e-mail to NCPS stating "I also appreciate your acknowledgement and confirmation of my request to rescind release of any information related to my daughter effective 4/12/13."</li></ul>
April 24-25, 2013	<ul style="list-style-type: none"><li>Parent and SECEP administrator exchanged e-mail correspondence regarding March 4, 2013, observation and records review.</li></ul>
February 25, 2014	<ul style="list-style-type: none"><li>ODRAS received complaint submission.</li></ul>
March 4, 2014	<ul style="list-style-type: none"><li>ODRAS issued Notice of Complaint.</li></ul>

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### Sub-issue 1A: *March 4, 2013, SECEP Observation*

- Special education regulations (34 C.F.R. § 300.15; 8 VAC 20-81-10) define "evaluation" as "procedures...used to determine whether a child has a disability and the nature and extent of the special education and related services that the child needs."<sup>3</sup> These regulations (34 C.F.R. §§ 300.303, 300.304, and 300.305; 8 VAC 20-81-60 and 70) set forth the procedures and requirements governing the evaluation and reevaluation of students with disabilities.
- The Virginia Regulations (8 VAC 20-81-70.F.1.a) provide that a reevaluation shall be

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<sup>2</sup>See April 16, 2013, e-mail correspondence from NCPS to parent, indicating March 4, 2013, date (parent's complaint submission, supporting materials; NCPS response materials).

<sup>3</sup>The Virginia Regulations, at 8 VAC 20-81-10, define "reevaluation" as the "completion of a new evaluation."

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conducted when a school division “determines that the child’s educational or related services needs, including improved academic achievement and functional performance, warrants a reevaluation.”

- Special education regulations also set forth requirements (34 C.F.R. § 300.300, and the Virginia Regulations, at 8 VAC 20-81-60.B.2, 8 VAC 20-81-70.G, and 8 VAC 20-81-170.E.1.a) for informed parental consent for the completion of initial evaluations and reevaluations. More specifically, informed parental consent is required before conducting any reevaluation of a child with a disability. Parental consent is not required before a (i) review of existing data as part of an evaluation or reevaluation; (ii) a teacher's or related service provider's observations or ongoing classroom evaluations; (iii) screening of a student by a teacher or specialist to determine appropriate instructional strategies for curriculum implementation; (iv) administration of a test or other evaluation that is used to measure progress toward the student’s IEP goals, and is included in the IEP; or (iv) administering a test or other evaluation that is administered to all children unless, before administration of that test or evaluation, consent is required of parents of all children.<sup>4</sup>
- To ensure that parental consent is informed, federal and state special education regulations provide that the school division must provide prior written notice (PWN) to the parent of a child with a disability of its proposal or refusal to initiate or change (i) a student’s identification, evaluation, or educational placement, or (ii) the provision of FAPE for the student. The regulations further set forth the content requirements for this notice, and state that this notice must be provided with a “reasonable time.”
- The parent has alleged that a SECEP administrator conducted an observation of her daughter, [REDACTED], on March 4, 2013, without her consent.
- The parties agree that a SECEP administrator observed [REDACTED] at BMS on March 4, 2013. Thus, our analysis must necessarily focus on the nature of this observation, and whether it constituted an evaluation for which consent was required.
- The record suggests that the March 4, 2013, observation was prompted, at least in part, by the IEP team’s discussions on February 22, 2013. The IEP meeting summary indicated discussion regarding a “continuum of services,” including “self [sic] contained Autism classes in Norfolk, SECEP, day treatment, residential, and homebased [sic] services.” While the summary indicated that the “IEP team will also get started on looking at other options on the continuum of services,” it included no mention of an “observation” or evaluation. Further, the associated PWN did not cite a proposed evaluation for [REDACTED].

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<sup>4</sup>The 2006 implement regulations, at 34 C.F.R. § 300.9, and the Virginia Regulations, at 8 VAC 20-81-10, define parental consent. These regulations specify that consent means the parent has been “fully informed of all information relevant to the activity for which consent is sought” and that the parent understands that consent is voluntary and may be revoked at any time.

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- E-mail exchanges between the parent and Mr. Greg Jacob, SECEP administrator provide more clarity regarding the nature of the March 4, 2013, "observation" of [REDACTED]. In his April 25, 2013, e-mail to the parent, Mr. Jacob stated that he "observed [REDACTED] from 11:00 [a.m.] until 11:40 [a.m.]" at BMS on March 4, 2013. Mr. Jacob stated that he "considered this an informal observation in order to determine if any SECEP classrooms in Norfolk served students who were similar to [REDACTED], and if any SECEP classrooms in other cities served similar students. I did not provide any written feedback to NPS [NCPS] but communicated verbally to [NCPS personnel] that the SECEP classrooms in Norfolk did not serve similar students, however [sic] that I did supervise classrooms in Portsmouth SECEP that did serve students who were similar to [REDACTED]."
- Although NCPS describes the March 4, 2013, observation as "informal" or as something other than an "evaluation" because neither NCPS nor [REDACTED] IEP team requested that "SECEP conduct an evaluation on [REDACTED], [REDACTED]," the record supports a different conclusion. The record indicates that the March 4, 2013, observation was a "procedure" to determine the "nature and extent" of [REDACTED] special education needs, and was designed to provide information for her IEP team to consider in exploring placement options for her. By definition, the observation constituted an "evaluation" under special education regulations.
- We must also determine whether this observation constituted an evaluation for which parental consent was required, or if a regulatory exception released NCPS from obtaining the parent's consent.
- NCPS has claimed that, in this case, parental consent was not required for the SECEP observation because consent is not required for "a teacher's or related service provider's observations or ongoing classroom evaluations." In her additional information, the parent has countered that "Mr. Greg Jacob does not meet the criteria for exemption of parental consent for observation.... Mr. Jacob is not an employee of Norfolk Public Schools, nor is he a teacher in the district [sic]. He is also not a related services provider for my daughter.... Mr. Jacob...[is] an assistant director at SECEP."
- The record indicates that Mr. Jacob, the SECEP administrator, was neither one of [REDACTED] teachers nor service providers; accordingly, the cited regulatory exception (8 VAC 20-81-70.G.2.b; 8 VAC 20-81-170.E.2.e) is inapplicable in this case. Further, we find no other regulatory exception to the parental consent requirement in the case. The March 4, 2013, observation constituted an evaluation for which the parent's consent was required.
- In reaching our finding on this sub-issue, we note the unique status of SECEP as a joint school, operated by NCPS and seven (7) other area school boards.<sup>5</sup> As such, we find that the

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<sup>5</sup> The Code of Virginia, at § 22.1-26 authorizes school boards, with the consent of the Virginia Board of Education, to establish joint or regional schools, comprehensive schools offering all-day academic programs and career and technical education, and regional residential charter schools for at-risk pupils, for the use of their respective school divisions. As indicated on its Web site, SECEP was created in 1978 by "the school systems of Chesapeake,

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SECEP administrator—regardless of the specific nature of his employment status—whether direct or indirect—with NCPS—acted on behalf of NCPS in conducting the March 4, 2013, observation. Stated another way, the SECEP administrator, in effect, acted as an “agent” of NCPS; NCPS was responsible for the March 4, 2013, observation, which required parental consent.

- There is no indication in the record that NCPS sought or obtained the required parental consent for the March 4, 2013, observation.
  - NCPS included a copy of a SECEP “Consent for Release of Confidential Information” form, signed by the parent on February 22, 2013. The form designated NCPS (with a handwritten “X”) as the agency “requested to furnish SECEP” with information regarding [REDACTED] “for the purpose of educational and programmatic planning.” Significantly, nowhere did this authorization document address parental consent for—or include notice of a proposed—evaluation of [REDACTED]. Further, the record did not include a copy of a PWN or a signed parental consent form regarding any evaluation or observation for [REDACTED].
- Based on the foregoing, we find NCPS to be in noncompliance on this sub-issue.

### Sub-issue 1B: *Records Review*

- Special education regulations (34 C.F.R. § 300.613; 8 VAC 20-81-170.G) set forth generally provisions governing confidentiality of information. These provisions address, among other things, parental rights to inspect and review education records relating to the student. More specifically, these regulations (34 C.F.R. §§ 300.32 and 300.623; 8 VAC 20-81-170.G.10) provide that parental consent must be obtained before personally identifiable information is disclosed to anyone other than school division officials, unless the information is contained in the education records, and the disclosure is authorized under the Family Education Rights and Privacy Act (20 U.S.C. § 1232 (FERPA)). Parental consent is not required before personally identifiable information is disclosed to school division officials collecting, maintaining, or using personally identifiable information as required by special education regulations, with limited exceptions.<sup>7</sup>

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Franklin, Isle of Wight, Norfolk, Portsmouth, Southampton, Suffolk and Virginia Beach.... The organization provides a formal structure through which the participating school systems can plan and operate programs for children with special needs. SECEP is a public body established in accordance with the Code of Virginia which provides for the establishment and operation of jointly owned schools. A Joint Board, made up of a lay member from each participating system's school board, serves as SECEP's policy-making board. This Joint Board meets regularly and functions like a local school board.”

<sup>6</sup>As the chronology indicates, the parent rescinded this release authorization on April 12, 2013, via e-mail correspondence, and that NCPS acknowledged this rescission.

<sup>7</sup>One such exception is that parental consent, or the consent of a student who has reached the age of majority, must be obtained before personally identifiable information is released to officials of any agency or institution providing or paying for transition services. Further, we note that the Virginia Regulations governing the Management of the Student's Scholastic Record in the Public Schools of Virginia (8 VAC 20-150-20) direct school divisions to manage

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- The parent has alleged that a SECEP administrator conducted a records review without her consent. In her additional information, the parent reiterated this assertion, stating that Mr. Jacob had not [sic] legitimate reason to ... review her records....We feel that Norfolk Public Schools and SECEP...violated my child's confidentiality by allowing review of her records, all without our knowledge or consent."
- That a SECEP administrator reviewed [REDACTED] educational records is not in dispute.<sup>8</sup> The record indicates that this review occurred sometime between February 25, 2013—the date the SECEP administrator received the student's records electronically—and March 4, 2013. Our task is to determine whether the parents had provided consent for this review.
- As noted above, the parent signed a "Consent for Release of Confidential Information" for the "purpose of educational and programmatic planning" on February 22, 2013.<sup>9</sup>
- Although the parent has alleged that "what I signed did not indicate I had agreed to...[a] cumulative record review of any kind," we find otherwise. The SECEP release authorization clearly identified NCPS as the party responsible for releasing "confidential information" regarding [REDACTED] to SECEP for "the purpose of educational and programmatic planning." While the form did not designate all records to be released, we find that the language of the release was sufficient to advise the signee of the action(s) to be undertaken. We further note that, although the parent has stated that NCPS "described that what I was signing was a release of information so that she [NCPS personnel] could call around to complete a SECEP programmatic survey of the types of services available,"<sup>10</sup> the release authorization contained no such limitation.
  - In the supporting materials included with her complaint submission, the parent stated that, at the February 22, 2013, IEP meeting, NCPS personnel advised her that the release authorization was needed for NCPS to "share a 'student profile.' When I asked her to describe this profile she was vague about what would be shared and stated 'PLOP

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the scholastic records of all students in compliance with applicable law, including FERPA and its implementing regulations, IDEA 2004, and various provisions of the Code of Virginia, including, but not limited to, §§ 16.1-260, 16.1-305.1, 16.1-305.2, 22.1-287, 22.1-287.1, 22.1-288.2, and 22.1-289.

<sup>8</sup>In April 16, 2013, e-mail correspondence between parent and SECEP administrator (parent's complaint submission, supporting materials), the SECEP administrator advised the parent that he had spoken to NCPS personnel on February 25, 2013, and "received the electronic copy of the release of information that you [the parent] signed as well as electronic copies of [REDACTED] IEP, progress reports and triennial review on 2/25/13.

<sup>9</sup>In her April 16, 2013, e-mail to NCPS, the parent rescinded her "authorization" for NCPS or SECEP to "observe" or "evaluate" [REDACTED]. Significantly, this written correspondence did not address a records review. NCPS responded by advising the parent that a "SECEP staff member completed a records review for programmatic planning and consideration of placement on 3/4/13," and stated that "[y]our request to rescind the release of information form is acknowledged effective the date of your email [sic], 4/12/13." NCPS did not distinguish between the parent's authorization for release of confidential information and her rescission of any authorization for observation and evaluation only.

<sup>10</sup>See April 16, 2013, e-mail correspondence between parent and NCPS (parent's complaint submission, supporting materials, and NCPS response).

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[present levels of academic and functional performance]...any behavioral concerns.’” In this supporting documentation, the parent stated that her agreement “authorized ‘research only’” rather than a records review for “programmatically planning and consideration of placement....”<sup>11</sup>

- We note that, in contrast to the specific regulatory requirements governing the content of PWN, special education regulations do not specify requirements for the sufficiency of an authorization or consent for the release of confidential information.<sup>12</sup> In cases such as the one before us, we must rely on the plain language of the authorization document itself, rather than recollections of IEP team discussions, verbal explanations, or possible miscommunications or misunderstandings between the parties.
- While we caution NCPS (and SECEP) regarding the need for clarity in the crafting of specific language of release authorizations to ensure mutual understanding of the scope of the consent sought, we find the plain language of the February 22, 2013, document supports an interpretation of parental consent to a release of the student’s confidential records by NCPS to SECEP.
- Based on the foregoing, we find the school division to be in compliance on this sub-issue.

### CORRECTIVE ACTION PLAN:

Because this office found NCPS to be in compliance with respect to Sub-issue 1B, no corrective action is required to address this matter.

However, this office found NCPS to be in noncompliance on Sub-issue 1A. The record does not indicate that [REDACTED] free appropriate public education was compromised by this violation, and accordingly, we need not address compensatory services. To resolve this issue, however, the Office of Dispute Resolution and Administrative Services requests that NCPS:

1. Issue an instructional memorandum to all NCPS administrators and special education personnel regarding regulatory requirements governing parental consent for reevaluations (8 VAC 20-81-70.G; 8 VAC 20-81-170.E.1.a; 8 VAC 20-81-170.E.2.a, b, c, d, e, and f; and
2. Provide this office with (i) a copy of the instructional memorandum; and (ii) evidence of its transmission to the above-identified personnel.

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<sup>11</sup>The parent cited an audio recording of the February 22, 2013, meeting, documenting these statements, but did not include a copy with her submission.

<sup>12</sup>We note that the parent was not entitled to PWN for a release authorization in this case; the consent sought did not address a proposed initiation and/or change in the identification, evaluation, placement, or FAPE for the student. See 8 VAC 20-81-170.C.

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Please maintain documentation of the actions taken as required in this Corrective Action Plan (CAP), including the documentation referenced in the CAP, as this information may be requested during our CAP implementation follow-up process on a later date.

**APPEAL INFORMATION:**

Please note that the findings in this Letter of Findings are specific to this case. While general rules are cited, findings in other cases may differ due to distinctions in the specific facts and issues in each case.

Either party to this complaint has the right to appeal these findings within 30 calendar days of our office's issuance of the Letter of Findings. Any appeal must be received by our office no later than **May 23, 2014**.

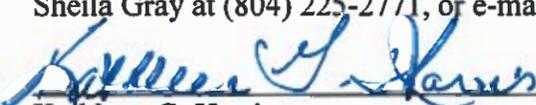
**Please be advised that the appeal request does not relieve the school division of its obligation to submit the above-referenced Corrective Action Plan, which is due on May 23, 2014.**

Enclosed is a copy of the appeal procedures. Written appeals should be sent directly to:

Patricia V. Haymes  
Director - Office of Dispute Resolution and Administrative Services  
Virginia Department of Education  
P. O. Box 2120  
Richmond, Virginia 23218

An appeal may also be filed via e-mail correspondence to [ODRAS@doe.virginia.gov](mailto:ODRAS@doe.virginia.gov), or via facsimile transmission to (804) 786-8520.

A copy of the appeal, along with any submitted documentation, must be sent simultaneously to the non-appealing party. Questions regarding these procedures should be addressed to Ms. Sheila Gray at (804) 225-2771, or e-mail at: [Sheila.gray@doe.virginia.gov](mailto:Sheila.gray@doe.virginia.gov).

  
Kathleen G. Harris  
Complaints Specialist  
Attachment - Appeal Procedures

c: Ms. Janice James-Mitchell  
Ms. Phyllis Mondak  
Ms. Wanda Council