



UNITED STATES DEPARTMENT OF EDUCATION
OFFICE FOR CIVIL RIGHTS

400 MARYLAND AVENUE, SW
WASHINGTON, DC 20202-1475

REGION XI
NORTH CAROLINA
SOUTH CAROLINA
VIRGINIA
WASHINGTON, DC

January 30, 2014

XXXX
XXXX
XXXX Charter School
XXXX
XXXX, North Carolina XXXX

Re: OCR Complaint No. 11-13-1XXX
Letter of Findings

Dear Ms. XXXX:

This letter is to notify you that the District of Columbia Office for Civil Rights (OCR), within the U.S. Department of Education (Department), has completed its investigation of the complaint that was filed against XXXX Charter School (School) on May 7, 2013. The complaint was filed by the parent (Complainant) of two students who attended the School (the Student and Student B). Both attended the School during the 2012-2013 school year. The students are currently enrolled in XXXX (District), which they also attended prior to the 2012-2013 school year. The School is its own Local Education Agency, chartered by the North Carolina State Board of Education.

The Complainant alleged that the School discriminated against the Student on the basis of his disability (XXXX) and retaliated against the Student and Student B. Her specific allegations are below.

The School discriminated against the Student on the basis of disability during the 2012-2013 school year by the:

1. School's use of manual restraints;
2. Individual Education Program (IEP) team's failure to consider all appropriate placements;
3. IEP team's failure to develop and provide an appropriate behavior intervention plan; and
4. School's attempt to unilaterally change the Student's placement.

The School retaliated against the Student and Student B when:

1. The School and School staff filed Juvenile Justice Complaints about the Student;
2. The School required the Complainant to remove the Student from the School within a designated period of time when there was a problem at the School; and
3. The School threatened to retain Student B for the Complainant's advocacy on behalf of the Student.

Additionally, the investigation of this complaint raised a concern that the IEP team was not composed of a group of individuals knowledgeable about the Student, his disability, the meaning of the evaluation data, and the placement options.

OCR enforces Section 504 of the Rehabilitation Act of 1973 (Section 504), 29 U.S.C. § 794, and its implementing regulation, at 34 C.F.R. Part 104, which prohibit discrimination on the basis of disability in programs and activities that receive Federal financial assistance from the Department. OCR also has jurisdiction to investigate under Title II of the Americans with Disabilities Act of 1990 (Title II), 42 U.S.C. § 12131 *et seq.*, and its implementing regulation, at 28 C.F.R. Part 35, which prohibit discrimination on the basis of disability by state and local government entities, including public education systems, irrespective of whether they receive financial assistance from the Department. The regulation implementing Section 504, at 34 C.F.R. § 104.61, incorporates the Department's regulation implementing Title VI, at 34 C.F.R. § 100.7(e), which prohibits a recipient or other person from discriminating against any individual for the purpose of interfering with any right or privilege secured by the regulation or because that person made a complaint, testified, assisted, or participated in any manner in an OCR investigation, proceeding, or hearing under the regulation. The Title II implementing regulation contains a similar prohibition of retaliation at 28 C.F.R. § 35.134. The School is a public entity and a recipient of Federal funds from the Department. Therefore, OCR has jurisdiction over the allegations stated above.

In investigating the allegations, OCR reviewed information provided by the Complainant and the School. After completing our investigation, OCR found sufficient evidence to support the Complainant's discrimination claims and to find that the School was in noncompliance with Section 504 and Title II. In order to remedy the concerns identified by OCR the School has entered into the enclosed Resolution Agreement. The provisions of the Agreement are aligned with the complaint allegations and the information obtained during OCR's investigation and are consistent with the applicable regulations. OCR did not find sufficient evidence to support the Complainant's retaliation claims. Below is a discussion of the facts related to each allegation, the legal standards applied, and our findings and conclusions.

Background

In 2011-2012, the Student attended kindergarten at a District school. The District identified the Student as a student with a disability who was eligible for special education and related aids and services. He was classified as having a "Developmental Delay – Atypical Behavior." The District developed a new IEP for the student effective May 15, 2012. This IEP changed the Student's placement from a resource classroom to a separate setting because of significant safety concerns. In May 2012 there was also a behavior intervention plan (BIP) in place for the

Student. The District held multiple IEP meetings before and after this meeting, including a manifestation determination review and a discussion of further testing for the Student. The Student's IEP team also recommended a modified day for the Student; however, the Complainant said she needed more time to consider this option and the Student was placed in the separate setting at the District school he was attending. At each of these District meetings there were multiple attendees including a counselor, day treatment therapists, and a behavior specialist. An IEP team meeting scheduled for the start of the 2012-2013 school year was never held because the Complainant moved the Student to the School after the close of the 2011-2012 school year.

The Student began in first grade at the School, at which time his XXXX IEP from the District was still in place. There were multiple disciplinary incidents throughout the school year, and School staff restrained the Student repeatedly.

On XXXX, The Complainant filed a complaint with the North Carolina Department of Public Instruction (DPI) alleging that: XXXX. DPI issued its findings on XXXX, finding that: <XXXX SENTENCES REDACTED XXXX>.

As a result of this investigation DPI mandated that the School evaluate the Student and provide him compensatory education. However, the Complainant had removed the Student from the School while the DPI investigation was pending and re-enrolled him in the District; therefore, the School was not required to implement the remedies. DPI did not investigate the School's use of restraint, provision of a BIP, inclusion of knowledgeable persons at IEP meetings, or issues related to placement because the Complainant did not raise these allegations with DPI. Further, DPI only looked at events that occurred before XXXX. Therefore, the allegations raised by the Complainant with OCR are different than those raised with DPI and OCR conducted an independent investigation of the Complainant's claims.

Disability Discrimination

Legal Standard

The implementing regulation for Section 504 at 34 C.F.R. § 104.4 provides that students with disabilities shall not, on the basis of disability, be excluded from participation in, be denied the benefits of, be afforded an opportunity that is not equal to that afforded others, or otherwise be subjected to discrimination. The regulation further provides that a recipient may not otherwise limit an individual in the enjoyment of any right, privilege, advantage, or opportunity enjoyed by others receiving an aid, benefit, or service. The regulation implementing Title II at 28 C.F.R. § 35.130 contains similar provisions. OCR interprets the Title II regulations to provide at least the same protections as those provided by Section 504.

Additionally, the Section 504 regulation, at 34 C.F.R. § 104.33 (a) and (b), requires that a recipient that operates a public elementary or secondary education program provide a free appropriate public education (FAPE) to each qualified disabled person within its jurisdiction, regardless of the nature or severity of the person's disability. The provision of an appropriate education is the provision of regular or special education and related aids and services that are

designed to meet the individual educational needs of disabled persons as adequately as the needs of non-disabled persons are met. The regulation implementing Section 504 at 34 C.F.R. § 104.33(b)(2) states that implementing an appropriately developed IEP is one way of meeting this standard. Additionally, when a student's behavior requires related aids and services or alternative discipline plans, a school typically develops a behavior intervention plan (BIP) to address the student's unique behavioral needs not easily addressed in the IEP or Section 504 Plan. The creation of a BIP should comply with the procedural requirements of Section 504 and these plans are typically incorporated by reference into a 504 Plan or IEP.

The Section 504 implementing regulation, at 34 C.F.R. § 104.35(a), requires a school to conduct an evaluation of any person who, because of a disability, needs or is believed to need special education or related services before taking any action with respect to the initial placement of the person in regular or special education and any subsequent significant change in placement. The regulation further requires, at 34 C.F.R. § 104.35(c)(1), the School to draw upon information from a variety of sources, including aptitude and achievement tests, teacher recommendations, physical condition, social or cultural background, and adaptive behavior. Also, 34 C.F.R. § 104.35(c)(3) requires the placement decision to be made by a group of persons, including persons knowledgeable about the child, the meaning of the evaluation data, and the placement options.

Except in extraordinary circumstances, OCR does not review the results of individual placement and other educational decisions as long as the school has complied with the procedural requirements of the Section 504 regulation.

Factual Findings

The Student exhibited significant behavioral problems throughout the 2012-2013 school year. In response, the School restrained him over 200 times and changed his placement multiple times. School administrators also called the police to respond to the Student's behavior several times.

The following is a summary of the IEP meetings for the Student during the 2012-2013 school year, including a description of whether and how the use of restraint was addressed at each:

- *August 22, 2012, IEP meeting:* This meeting began with a discussion of a disciplinary incident that day. The Complainant told the School the Student was in a self-contained class with a resource teacher at his previous school and the Student would scream, hit, kick, throw and scratch. The XXXX (Director) explained how the Student is now being restrained for a few minutes at a time. A log of restraints was started the next day, August 23, 2013. The paperwork from this meeting contains an unsigned, undated BIP that appears to be a slightly modified version of the BIP created by the District. This BIP contained no discussion of the use of restraint.
- *January 25, 2013, IEP meeting:* At this meeting, the Student was formally placed in a separate special education classroom for 330 minutes five times a week, without any related services. This placement was in a classroom with no other students and staffed by a teacher and an aide. The team found this placement was justified based on the Student's aggressive and unpredictable behavior. The Student's restraint log indicated that he was

placed in restraint 120 times between August 23rd and January 24th, with each restraint ranging in time from 1 minute to 32 minutes. However, the Student's regular restraint was not discussed at this IEP meeting.

- *February 21, 2013, telephone conference with the Complainant:* The following crisis intervention plan was developed:
 1. [Student] assaults a staff member: [Complainant] will be called immediately for [Student] to go home.
 2. [Complainant] will call someone such as his grandmother to come get him.
 3. Once [Student] is suspended someone needs to be here within 45 minutes or social services or police office [sic] will be called.
- *February 28, 2013, IEP meeting:* There were no significant changes to the IEP at this meeting. The Complainant rejected the School's proposal that the Student only attend school for half a day. The team engaged in discussion about a possible change in placement to homebound and the services that would be needed if this change occurred. The Student was restrained another 37 times between the January 24th and February 28th meetings. These restraints ranged from 1 minute to 26 minutes. Again, this restraint was not discussed.
- *March 5, 2013, IEP meeting:* The Student's day was shortened to 245 minutes a day. The written justification for this change cites the fact that multiple interventions were used and multiple settings were tried to address the Student's behavior, all of which did not provide consistent success. The team found that the Student was a danger to himself as well as other peers and adults.
- *March 20, 2013, IEP meeting:* The purpose of this meeting was to review the half day placement for the Student. The meeting notes mentioned restraint in passing, stating that the School only suspends the Student when he "intentionally hurts a staff member when no restraints are in place." Additionally, there was a statement that the Complainant was aware that the Student was restrained "at times" and she did not have concerns with this practice. There was no other discussion of restraint. At this meeting the BIP was slightly modified to include responsibilities of the parent/guardian and school staff; specifically, teaching "academic skills" was removed from the responsibilities the teacher. The BIP continued to have no discussion about the use of restraint.
- *April 30, 2013, IEP meeting:* This meeting was a XXXX IEP meeting and the Student was returned to a full day schedule. The only placement options considered were for the Student to attend the School for either a half or a full day. The BIP was again revised but not changed in a significant way; the only change was that "punching" was added to a list of behaviors the Student should not use. This meeting was also a manifestation determination review, where the questioned behavior was found to be a manifestation of the Student's disability. The meeting notes state that the team needed more information to determine what aids and services the Student requires. The team agreed to reconvene to address the need for reevaluation; however, the team did not reconvene on this issue.
- *May 9, 2013, IEP meeting:* This meeting began with another manifestation determination review for the Student where the behavior was found to be related to his disability. The team reviewed the BIP at this meeting, but there were no changes to the BIP or the IEP.

Some of these IEP meetings briefly mentioned the fact that the School and School staff filed several juvenile justice complaints against the Student. At the April 30th meeting the Director

refused to talk about the juvenile justice complaints, stating that they were “a separate issue.” The Director informed OCR that she filed the complaints because the student assaulted teachers. The following complaints were filed:

- *March 26, 2013*: The Director filed the complaint and the School is listed as the victim. In the complaint the Director stated that the Student is assaulting the teachers and staff on a regular basis and that she and a teacher have bruises and cuts from trying to restrain him.¹ The complaint goes on to state that the Director would like the Student to have more options and for the Complainant to follow through with the Student’s treatment. This complaint was supplemented by the Special Education teacher on May 7, 2013. This teacher reported injuries she received from the Student striking her and the teaching assistant.
- *May 17, 2013*: The Director filed the complaint and the School is listed as the victim. The police were called to the School that day because the Student was reported to have assaulted teachers at the School. The Director said she did not know what else to do, so she contacted the police.
- *May 24, 2013*: The Special Education teacher filed this complaint. According to the complaint, the Student was kicking and hitting teachers. The officer tried to talk to the Student, but he would not respond and started crying. The Complainant also filed a complaint this day, alleging that the Student was a victim because he had carpet burns on his back. The Student said XXXX had dragged him on the carpet by his legs and the Director had grabbed him by the neck. The police called the Complainant and said the School staff did not intend to harm Student and the case was closed.

Analysis

Use of restraint & IEP team’s failure to develop and provide an appropriate BIP

The School’s records indicate that the Student was restrained 211 times on 69 different days during 2012-2013 school year.² The restraint logs indicate that the Student was restrained for almost 1400 minutes (about 23 hours), the equivalent of over four days of school.³ The School informed OCR that the following restraints were used: Crisis Prevention Intervention (CPI) Kick Block, CPI One-Hand Wrist Grab Release, CPI Bite Release, CPI Children’s Control Position, CPI Team Control Position, CPI Transportation Position, and CPI Interim Control Position.⁴

¹ The Director is not certified in restraint. She told OCR that she only restrains the Student until someone who is trained arrives. However, the Complainant told OCR that on one occasion she entered the School’s main office to pick the Student up and the Director was restraining him.

² NC Gen Stat. §115C-391.1 permits the use of restraint in public schools under certain conditions. OCR encourages the School to review its restraint practices to ensure that it is in compliance with this state law.

³ There is some evidence that the Student was restrained for even more time. OCR found that the log the School maintained of the Student’s restraints was not complete. For example, the written account of the May 24th incident describes at least three separate restraints, but only one restraint is noted in the log. Additionally, the IEP notes from the August 22, 2012, IEP meeting state the School had already restrained the Student, but the log does not start until August 23, 2012.

⁴ Additional data reviewed by OCR indicates that other restraints were used, including a teacher holding the Student in her lap while another staff member removed his shoes.

Of particular concern is the XXXX incident during which the Complainant alleged that the Student was restrained by XXXX and received rug burns. The School's records indicate that the Student was only at school for 51 minutes that morning and, in that time, he was restrained at least three times, only one of which appears in the restraint log. Additionally the police were called to respond to the Student's behavior and when the Student would not look at the police officer the officer pried his eyes open. With regard to the rug burns that resulted from XXXX holding the Student on the ground, the School claims these injuries occurred because he was kicking and flailing on the ground. However, there is no statement in the detailed description from the School that the Student was on the ground this day.⁵ After the Student was injured, the Complainant stopped sending him to the School and reenrolled him in the District for the 2013-2014 school year.

Although the regular use of restraint by the School suggests that it was used as a behavioral tool, the appropriate use of restraint, or alternative behavioral tools, was never considered by the Student's IEP team. For example, the Complainant once asked if there was a guidance counselor at the School who could assist the Student with his behavioral problems. The Director responded that she had a counseling degree and used appropriate techniques in her interactions with the Student. However, there was never a discussion of providing the Student with counseling or any other aid or service related to his behavioral disability.

The use of restraint was also not included in any version of the Student's BIP or Crisis Plan. The Student's BIP solely provided for a sticker reward system for completed activities and had no other provisions to address the Student's significant behavioral problems. Although school staff conducted "behavioral observations" of the Student, there was no analysis of these observations, no discussion of them in the notes of the IEP meetings, and there were no changes in the BIP based on this information. None of these observations were conducted by individuals with specific knowledge of behavioral disabilities, such as behavior consultants or psychologists. In short, although the Student's behavior continued to deteriorate, there was no meaningful evaluation of his behavior by the School nor were there any significant changes to the BIP.

The Crisis Plan developed by the School and referenced in the BIP was also problematic as it relied solely on the Complainant to remove the Student from the School, rather than providing a road map for School staff to appropriately address the Student's disability. OCR notes that a parent may be a part of an appropriate crisis plan. However, parents or guardians should not bear full responsibility for responding in a crisis at a school. Further, a parent should not be threatened with the involvement of social services if he or she cannot respond in a specified period of time, as provided by the School's written Crisis Plan for the Student.

This information indicates that the Student was not provided a FAPE consistent with the requirements of Section 504. The Student's IEP, BIP and Crisis Plan did not comply with the procedural requirements of Section 504, as these plans did not consider or address the use of restraint for the Student. Although restraint was not a behavioral tool meaningfully considered or approved by his IEP team, it was used to cumulatively deny him over four days of educational

⁵ The School did not provide documentation of this restraint or the injury in the initial data response, despite a request for all documentation regarding restraints of the Student. Later the School provided detailed notes of this day.

time. These plans also failed to comply with the procedural requirements of Section 504, as discussed in greater detail below.⁶

Recently the Complainant informed OCR that the Student still feels wounded by the way that he was treated by his teacher at the School, including the multiple restraints. He regularly discusses this treatment in his counseling sessions and in conversation with his family. The Complainant believes there is lasting negative impact on the Student.

IEP team's failure to consider appropriate placement options

As detailed above, Section 504 requires IEP teams to consider, and document consideration of, appropriate placements for a student and to provide education in the least restrictive environment. The evidence indicates that the Student's current setting was not meeting his needs and that the School needed to consider other placement options. This evidence includes information that the Student continued to exhibit significant behavioral problems that required the School to repeatedly restrain him and call the local police and the fact that he was, for a period, placed on shortened days. Despite indications that the Student's disability was quite severe and that the School may not have been able to meet his needs through its existing programs, the IEP team only considered placement at the School, including a regular classroom setting, a resource setting, a separate classroom with two adults and no other students, and homebound. There was no indication the team considered any other placement options – including a self-contained classroom for students with behavior disabilities, a therapeutic placement, or a private setting. The fact that certain options may not be typically offered by the School does not excuse the IEP team from considering them if they are necessary; the team must identify the appropriate placement, and the School is then responsible for taking the necessary steps to provide a student with that placement. The failure to consider a broader range of placements is inconsistent with the requirements of Section 504.

Failure to convene a group of people knowledgeable about the Student, his disability, the meaning of the evaluation data, and the placement options

The IEP meetings at the School were only attended by the Director, Complainant and the two special education teachers.⁷ Because the Student's behavior was so extreme, and because the Director made clear in her reports to the local police that she needed more options to address the Student's needs, it is evident that the team needed a member with more expertise on the Student, his disability, and the placement options. This individual could have been a psychologist, behavior expert, counselor or other specialized expert. These IEP meetings therefore did not comply with Section 504's requirement that evaluation and placement decisions be made by a group of people knowledgeable about the Student, his disability, and the placement options.

⁶ OCR notes that, under the circumstances of this complaint, it does not have jurisdiction over School teachers calling the police in their individual capacity or over the police officers who responded to calls about the Student's behavior at the School. However, a properly developed IEP, BIP, and Crisis Plan might have prevented the Student's behavior from escalating to the point where these calls to the police were deemed necessary.

⁷ The only exception was one meeting where the School's attorney and a state IEP facilitator were present. IEP meeting notes indicate that neither of these individuals was included at the meetings because they were knowledgeable about the Student, his disability, or placement options.

Attempt to unilaterally change the Student's placement through juvenile justice complaints

The complaint alleged that the School filed juvenile justice complaints against the Student in an attempt to unilaterally change his placement. The juvenile justice complaints contain clear statements from the Director that the School could not handle the Student, did not know how to address his disability-related needs, and was seeking more “options” for him. However, as discussed above, a full continuum of placements was not considered when placing the Student through the IEP process, the appropriate mechanism for considering “options” for him.

Ultimately, none of these juvenile justice complaints resulted in a direct change in placement for the Student. There is, therefore, not enough evidence to indicate that the School used these complaints to actually unilaterally change his placement. However, while there may be some instances when contacting the police is necessary, OCR again notes that a properly developed IEP, BIP, and Crisis Plan might have prevented the Student's behavior from escalating to the point where these calls to the police were deemed necessary.

Remedies

Based on the information detailed above, the School did not comply with the requirements of Section 504 and Title II. On January 24, 2014, the School signed the enclosed agreement which, when fully implemented, will resolve the concerns identified in this investigation.

Retaliation

Legal Standard

OCR will look at the following three elements to determine if the Complainant has stated an initial case of retaliation: 1) whether the Complainant engaged in a protected activity (e.g., filed a complaint or asserted a right under a law enforced by OCR); 2) whether the School took a materially adverse action against the Complainant or someone closely related to the Complainant; and 3) whether the School took the adverse action because the Complainant engaged in the protected activity. If all these elements are present, this establishes an initial or prima facie case of retaliation. OCR then determines whether the School has a legitimate, non-retaliatory reason for its action. Finally, OCR examines whether the School's reasons for its action are a pretext or excuse for unlawful retaliation.

The Complainant engaged in a protected activity when she advocated for the Student at multiple IEP meetings. Below, OCR will examine each act the Complainant claimed was retaliatory to determine whether: a) it was adverse; and, if so, b) whether the school took the adverse action because the Complainant engaged in the protected activity.

Filing juvenile justice complaints about the Student and requiring the Complainant to remove him from the School when there was a problem

OCR determined that both filing juvenile justice complaints against the Student and requiring the Complainant to pick the Student up within 45 minutes under the Crisis Plan are adverse actions

because they are actions that could well dissuade a reasonable person from engaging in protected activity. However, OCR also determined that these adverse actions were not taken because of the Complainant's protected activity (her advocacy for the rights of Student). The School claims that it took these actions because it did not know any other way to address the Student's behavior. The actions do appear to have been taken in response to genuine behavioral problems; even if they were not the most appropriate way to meet the Student's disability-related needs. Therefore, OCR finds insufficient evidence of retaliation.

Threatening to retain Student B for the Complainant's advocacy on behalf of the Student

<XXXX Sentence Redacted XXXX>. At the end of the 2012-2013 school year the School determined that Student B should be retained for the 2013-2014 school year. This could be an adverse action, as it could well dissuade a reasonable person from engaging in protected activity. Again, however, OCR has determined that it was not caused by the Complainant's protected activity. OCR examined the school's explanation of why it determined to retain Student B to see if there was direct or circumstantial evidence that the retention was caused by the protected activity. Notes from the Student's January 17, 2013, conference state that Student B "is in danger of retention. He is making progress, but he is currently at a beginning of first grade level." The teacher comments on Student B's report cards also support the School's claim that Student B was below grade level. Thus, teacher records indicate that Student B had not made sufficient progress to move to the next grade level.

OCR also examined whether there was evidence that the school had not treated Student B in a manner consistent with how it treats other students. The School told OCR there were three other students retained last year, two of whom had parents who engaged in protected activities when they attended IEP meetings for the retained student XXXX. One student was retained even though his parents did not engage in a protected activity. Each of these three other students were retained because their achievement indicated that they were not ready to progress to the next grade level. OCR compared Student B's academic achievement to that of these three students on standardized measures and found that the other three students were generally achieving at or above their expected grade level, while Student B was achieving slightly below his expected grade level. This information supports the conclusion that the School's reason for retaining Student B was application of standard academic considerations and was not caused by the Complainant's protected activity. In the absence of direct or circumstantial evidence of a causal connection between the Complainant's protected activity and the School's action with regard to Student B, there is therefore insufficient evidence to find that the School retaliated against Student B in the manner alleged.

CONCLUSION

This letter is a letter of findings issued by OCR to address an individual OCR case. Letters of findings contain fact-specific investigative findings and dispositions of individual cases. Letters of findings are not formal statements of OCR policy and they should not be relied upon, cited, or construed as such. This letter is not intended, nor should it be construed, to cover any other issues regarding the School's compliance with the regulations enforced by OCR that may exist

and are not discussed herein. Please be advised that the Complainant may file a private suit in Federal court whether or not OCR finds a violation.

Under the Freedom of Information Act, it may be necessary to release this document and related correspondence and records, upon request. In the event that OCR receives such a request, we will seek to protect, to the extent provided by law, personally identifiable information, which, if released, could reasonably be expected to constitute an unwarranted invasion of personal privacy. In accordance with agency procedures, OCR is required to remind you that intimidation or retaliation against complainants by recipients of Federal financial assistance is prohibited. No recipient shall intimidate, threaten, coerce, or discriminate against any individual for the purpose of interfering with any right or privilege secured by the laws OCR enforces, or because one has made a complaint or participated in any manner in an investigation in connection with a complaint.

If you have any questions concerning OCR's determination please contact one of the attorneys assigned to this complaint Judith Risch at (202) 453-5925 or via e-mail at Judith.Risch@ed.gov.

Sincerely,

/s/

Rachel Glickman
Team Leader
District of Columbia Office
Office for Civil Rights

cc: XXXX, Esquire

Enclosure