

# Special Education Legal Updates: State Perspective

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# It's all about the kids...



# Purpose of IDEA (34 C.F.R. § 300.1)

- To **ensure** that **all** children with disabilities have available to them a **free appropriate public education (FAPE)** that emphasizes special education and related services designed to meet their **unique needs** and prepare them for **further education, employment, and independent living**;
- To **ensure** that the **rights of children with disabilities and parents** of such children are **protected**;

# Purpose of IDEA (34 C.F.R. § 300.1)

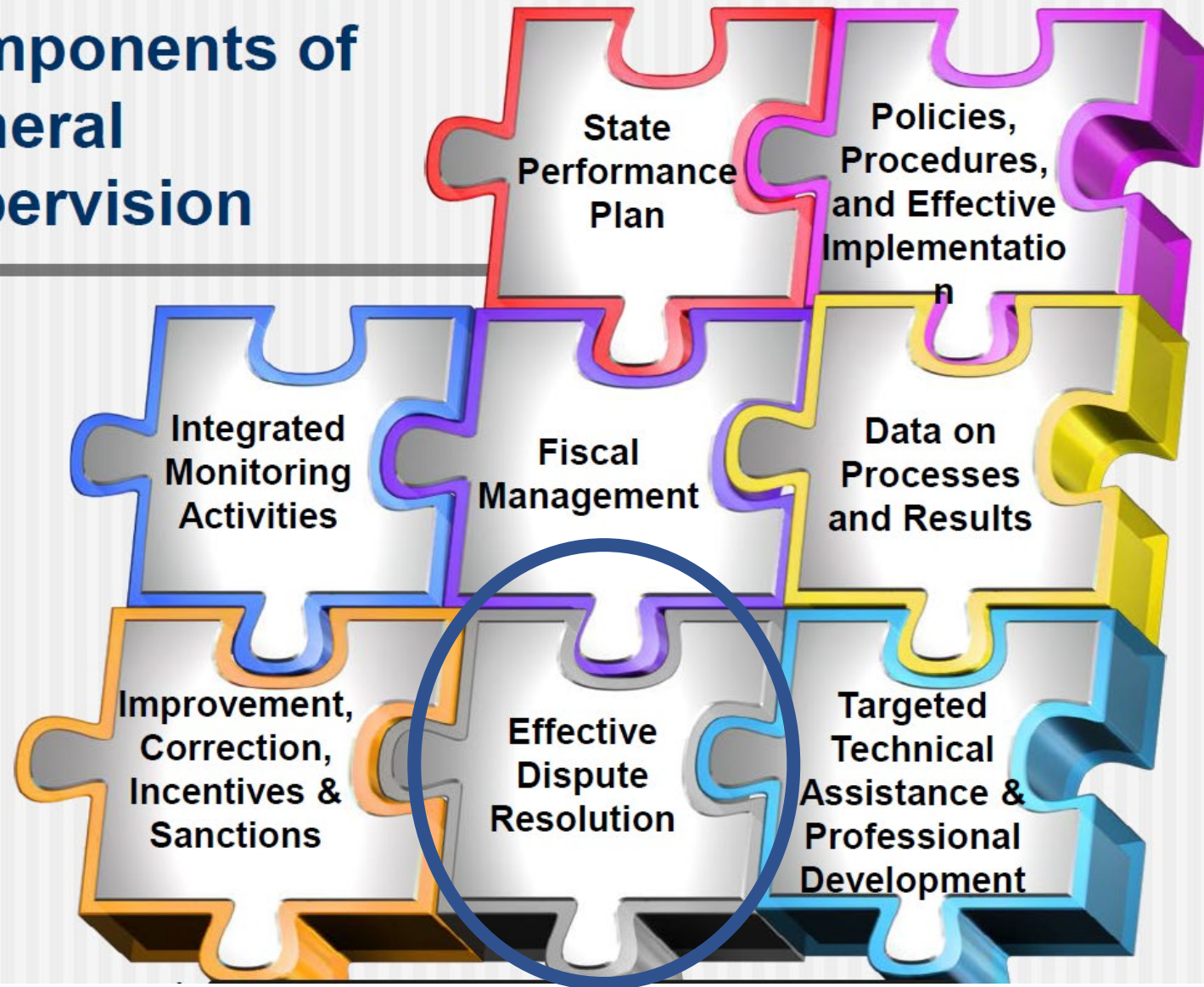
- To assist **States, localities**, educational service agencies, and Federal agencies **to provide** for the education of all children with disabilities
- To assess, and ensure the **effectiveness** of, efforts to educate children with disabilities.

# SEA responsibility for general supervision (34 C.F.R. 300.149)

- The State Educational Agency (SEA) is responsible for **ensuring**:
  - (1) That the **requirements of IDEA Part B** are carried out; and
  - (2) That **each educational program** for children with disabilities administered within the State, including each program administered by any other State or local agency
    - (i) Is **under the general supervision** of the persons responsible for educational programs for children with disabilities in the SEA; and
    - (ii) **Meets the educational standards of the SEA**



# Components of General Supervision



# Dispute Resolution Data



# Mediation Data (as of March 1, 2023)

	FY2020	FY2021	FY2022	FY2023 YTD
Mediation Withdrawn	22 (20%)	17 (14%)	28 (22%)	28 (33%)
No Mediation Agreements	31 (27%)	60 (49%)	50 (38%)	32 (38%)
<b>Mediation Agreements</b>	<b>59 (52%)</b>	<b>45 (37%)</b>	<b>52 (40%)</b>	<b>17 (20%)</b>
Pending	--	--	--	8 (9%)
<b>Total</b>	<b>112</b>	<b>122</b>	<b>130</b>	<b>85</b>



# Formal Complaint Data (as of March 1, 2023)

	FY2020	FY2021	FY2022	FY2023 YTD
Complaints Denied	15 (11%)	22 (14%)	32 (15%)	28 (16%)
Complaints Withdrawn	66 (45%)	44 (28%)	51 (23%)	26 (14%)
<b>Complaints with Resolution Letters Issued with one or more finding of non-compliance</b>	<b>42 (29%)</b>	<b>40 (26%)</b>	<b>78 (36%)</b>	<b>35 (20%)</b>
Complaints with Resolution Letters Issued with no findings of non-compliance	21 (15%)	50 (32%)	57 (26%)	33 (18%)
Pending	--	--	--	57 (32%)
<b>Total Complaints Filed</b>	<b>144</b>	<b>156</b>	<b>218</b>	<b>179</b>

## Due Process Hearing (DPH) Data (as of March 1, 2023)

	FY2020	FY2021	FY2022	FY2023YTD
DPHs Withdrawn	12 (13%)	16 (22%)	15 (13%)	7 (8%)
<b>DPHs Dismissed</b>	<b>77</b> <b>(81%)</b>	<b>54</b> <b>(74%)</b>	<b>83</b> <b>(72%)</b>	<b>34</b> <b>(40%)</b>
DPHs Held in Favor of Parent	3 (3%)	0	3 (3%)	0
DPHs Held In Favor of District	2 (2%)	1 (1%)	7 (6%)	0
Pending	1 (1%)	2 (3%)	7 (6%)	43 (52%)
<b>Total</b>	<b>95</b>	<b>73</b>	<b>115</b>	<b>84</b>



# Formal Complaints

# Formal Complaint Trends

- Number of complaints filed are back at pre-pandemic levels
- More complaints filed by current school staff
- More complaints filed in districts who have not historically had complaints
- More complaints filed on behalf of more than one student (systemic)

# FY20 Findings of Non-Compliance in Formal Complaints (100 Findings against 21 districts)

- **Implementation of individualized education program (IEP) (21)**
- **Development, review, and revision of IEP (16)**
- **Free, Appropriate Public Education (14)**
- **Evaluations and Reevaluations (6)**
- Parent Participation (6)
- Personnel Qualifications (4)
- IEP Team (4)
- Access Rights (4)
- Least Restrictive Environment (3)
- Discipline Procedures (3)
- Child Find (3)
- Prior Written Notice (3)
- Mediation agreement (3)
- Special Education (2)
- When IEPs must be in effect (2)
- Extended School Year (2)
- Assistive Technology Services (1)
- Transition Services (1)
- State Monitoring (1)
- Class Size (1)

# FY21 Findings of Non-Compliance in Formal Complaints (68 Findings against 18 districts)

- **Implementation of IEP (13)**
- **Development, review, and revision of IEP (12)**
- **Evaluations and Reevaluations (10)**
- **Free, Appropriate Public Education (8)**
- Child Find (6)
- Prior Notice by public agency (5)
- Least Restrictive Environment (4)
- Parent Participation (3)
- Access Rights (3)
- Parental Consent (1)
- IEP Team (1)
- Procedural Safeguards Notice (2)



# FY22 Findings of Non-Compliance in Formal Complaints (121 Findings against 28 districts)

- **Implementation of IEP (29)**
- **Development, Review and Revision of IEP (16)**
- **Evaluations and Reevaluations (12)**
- **Free, Appropriate Public Education (20)**
- Personnel Qualifications (8)
- Least Restrictive Environment (10)
- Prior Notice by Public Agency (4)
- Child Find (3)
- Procedural Safeguards Notice (2)
- Access Rights (2)
- IEP Team (1)
- Parent Participation (3)
- Confidentiality (3)
- Related Services (2)
- Discipline Procedures (1)
- Amendment of Records at Parent Request (1)
- When IEPs must be in effect (1)
- Physical Education (1)
- Equitable Services (1)
- Dispute Resolution (1)

# FY23 YTD Findings of Non-Compliance in Formal Complaints (65 Findings against 21 districts)

- **Implementation of IEP (16)**
- **Free, Appropriate Public Education (13)**
- **Evaluations and Reevaluations (8)**
- **Development, Review and Revision of IEP (7)**
- Least Restrictive Environment (4)
- Prior Notice by Public Agency (3)
- Parent Participation (2)
- Access Rights (2)
- Related Services (2)
- When IEPs must be in effect (2)
- Personnel Qualifications (1)
- IEP Team (1)
- Confidentiality (1)
- Discipline Procedures (1)
- State Monitoring (1)
- Service Plan (1)

# Implementation of IEP

# Implementation of IEP (34 C.F.R. § 300.320)

- This regulation defines an IEP and details the required components of an IEP.
- “Each public agency must ensure that, **as soon as possible** following development of the IEP, special education and related services are made available to the child **in accordance with the child’s IEP.**” 34 C.F.R. § 300.323(c)(2)
- **Overarching issue: Students not receiving the special education and related services required in the IEP**

# Incorrect service model

- Student's IEP required collaborative instruction in a general education setting for 90 minutes weekly in science and English language arts (ELA) and 90 minutes small group instruction for social skills/study skills
- On May 2, 2022, the IEP Team agreed to move the student to homebased instruction for the rest of the school year. No changes were made to placement or service hours in the student's IEP.
- Student was using asynchronous computer program for academics, and study skills teacher "checked" on the student daily

# Incorrect service model 2

- High school student's IEP required 21.5 hours of small group instruction in all academic areas and job readiness training via opportunities within the school building; for first semester, the student worked with the custodian and missed his ELA block



# Incorrect service model 3

- Middle school student's IEP required co-teaching instruction 55 minutes daily in ELA, Mathematics, Science, and Social Studies
- The district moved to block scheduling with 55-minute reading enrichment class, (2) 90-minute blocks of core subjects, 1 connections, and 50-minute intervention period daily
- Student's IEP required 550 minutes every two weeks of co-teaching instruction in each core content areas, but current schedule only included 450 minutes every two weeks of co-teaching instruction in each core content area

# Lack of documentation that student received special education and related services required in the IEP

- Kindergartener's IEP included 45 minutes daily of supportive instruction in alternate science/social studies units and specials with paraprofessional in the general education setting
- After a change in kindergarten teacher's schedule, student went to general education classroom during "center time" instead of science/social studies time

# Lack of documentation that student received special education and related services required in the IEP 2

- Transportation added to student's IEP on September 23, 2021, but transportation not provided until November 1, 2021
- Check in/check out system added to student's IEP on September 2, 2022, but not provided until October 7, 2022

# Lack of documentation that parent received periodic progress on goals

- Student's IEP required reporting of student's progress on annual goals every nine weeks, but parent only received two progress reports the entire school year
- Parent was provided IEP progress reports after making a records request in July 2022, but never received the progress reports a reasonable time after they were completed
- No documentation that parent received quarterly IEP progress reports until parent hired an attorney in March 2022

## Absence of certified personnel (e.g., teacher/provider vacancies and absences)

- Student did not have one-to-one paraprofessional as required in the IEP when the paraprofessional was promoted, and no replacement provided
- Student's IEP requires a bus monitor to provide emergency seizure medication; District hired three different monitors who all declined or resigned from the position

## Absence of certified personnel (e.g., teacher/provider vacancies and absences) 2

- Two students did not receive supportive services when paraprofessional was absent, and substitute was used to cover another class
- Student did not receive supportive instruction in science when the paraprofessional was absent more than 10 cumulative days and no substitute assigned in the paraprofessional's absence



# Lack of fidelity and/or consistency in provision of IEP/BIP/student supports

- At beginning of sixth grade year, student's daily behavior sheet, supervisory accommodations during breaks, restroom accommodation, token economy and counseling services were not provided consistently

# What you need to think about...

- Procedures for checking IEP service pages before start of school year (especially the transition years from elementary to middle and middle to high)
- Procedures when special education teachers and related service providers are absent and when there is a vacancy (also, missed IEP services)
- How to document services and accommodations
- Ensuring all teachers are aware of students' IEPs
- Collecting sufficient progress monitoring data
- Providing timely progress reports
- Procedures for transfer students with IEPs

# Free Appropriate Public Education (FAPE)

# §300.17 Free appropriate public education

- Free appropriate public education or FAPE means **special education and related services** that—
  - (a) Are provided at **public expense**, under public supervision and direction, and without charge;
  - (b) Meet the **standards of the SEA**, including the requirements of this part;
  - (c) Include an **appropriate preschool, elementary school, or secondary school education** in the State involved; and

# §300.17 Free appropriate public education

- (d) Are provided in conformity with an **individualized education program (IEP)** that meets the requirements of §§ 300.320 through 300.324.
  - 34 C.F.R. § 300.320 – Definition of IEP
  - 34 C.F.R. § 300.321 – IEP Team
  - 34 C.F.R. § 300.322 – Parent Participation
  - 34 C.F.R. § 300.323 – When IEPs must be in effect
  - 34 C.F.R. § 300.324 – Development, review, and revision of IEP

# Free appropriate public education (FAPE)

- Kindergarten student placed in a booster seat and strapped in during calendar time due to self-stimming behavior that was a distraction to other students; the use of booster seat in this way met the definition of a mechanical restraint in violation of [Georgia's Seclusion and Restraint Rule](#).
- The booster seat was not being used to promote body positioning, prevent self-injurious behavior, or used to secure the student during transportation

# Evaluations and Reevaluations



# Evaluations and Reevaluations

## (34 C.F.R. §§ 300.301-300.306)

- These regulations address initial evaluations (request, timelines, procedures), reevaluations, and eligibility.
- For additional information on timelines, refer to [State Board of Education Rule 160-4-7-.04](#)(1), which provides exceptions for holiday periods, summer vacations, and when consent is received with less than 30 days remaining in the school year.

# Evaluations and Reevaluations 2

- 12<sup>th</sup> grade student eligible under Autism Spectrum Disorder (ASD), Other Health Impairment (OHI), Specific Learning Disability (SLD), Speech-language Impairment (SI)
- Student turned 18 in May 2022 and IEP Team recommended student to graduate with regular education diploma. Parents disagreed and filed for a due process hearing on the same day
- District drafted student's summary of performance (SOP) but did not provide the SOP to the student. District conferred diploma to student in late May 2022.
- Due process hearing was dismissed because parents were not the "IDEA parent" once rights transferred to the student at age 18.

# Evaluations and Reevaluations 3

- Student evaluated in previous years and determined not eligible; last ineligible determination based on private evaluation was on April 11, 2022
- Parent sent email to special education director requesting a special education evaluation on August 29 and 31, 2022, and September 2 and 7, 2022
- No parental consent for evaluation and/or prior written notice (PWN) provided.

# Evaluations and Reevaluations 4

- Student's initial referral for evaluation was related to concern in speech and behavior, but no speech evaluation conducted
- The psychological evaluation and eligibility report contained data inconsistent with the teachers' behavior rating scales and district failed to conduct additional testing after inconsistencies in the area of behavior
- The district also failed to consider the private psychological evaluation with diagnosis of Autism

# Evaluations and Reevaluations 5

- Parent requested a functional behavioral assessment (FBA) on August 2021; parental consent provided and signed in October 2021; parent emailed teacher in August 2022 about status of FBA; IEP Team meeting in September 2022 and new consent provided and signed; FBA completed in November 2022
- Student's reevaluation due by October 19, 2021; district did not begin reevaluation process until September 9, 2021, and Team determined additional data was needed; as of December 9, 2022, the reevaluation was not completed

# What are the timelines for completing the reevaluation process?

- The 60-day timeline only applies to the initial evaluation. Once a child is in special education, all further evaluations are considered reevaluations, regardless of whether there is any change in the disability(ies).
- The reevaluation must be completed within a **reasonable timeframe**, no later than the three-year reevaluation date.
- However, many **factors should be considered** in determining a reasonable timeframe for the completion of a reevaluation, such as the **needs of the child, the date of the last comprehensive evaluation, parent input, and changes in the child's behavior, attendance, and rate of progress.**
- From [GaDOE Special Education Rules Implementation Manual, Evaluation and Reevaluation Chapter](#) (August 6, 2018)



# Evaluations and Reevaluations 6

- District timely completed the student's reevaluation and determined that no additional data were needed to determine continued eligibility and the student's educational needs, but the district failed to notify the parent of their right to request an assessment



# 34 C.F.R. 300.305(d)

- **Requirements if additional data are not needed.**
- (1) If the IEP Team and other qualified professionals, as appropriate, determine that no additional data are needed to determine whether the child continues to be a child with a disability, and to determine the child's educational needs, the public agency **must notify the child's parents of -**
  - (i) That **determination** and the **reasons for the determination**; and
  - (ii) The **right of the parents to request an assessment** to determine whether the child continues to be a child with a disability, and to determine the child's educational needs.
- (2) The public agency is not required to conduct the assessment described in [paragraph \(d\)\(1\)\(ii\)](#) of this section unless requested to do so by the child's parents.

# Evaluations/Reevaluations - What you need to think about...

- Procedures when a parent requests a special education evaluation
- Disseminating those procedures to all staff, including those participating in Student Support Team (SST)/Response to Intervention (RTI) and Section 504 meetings
- Procedures for requests for reevaluations and decisions that no additional data are needed for reevaluation
- Conducting and documenting comprehensive evaluations and reevaluations

# Development, Review, and Revision of IEP

# Development, Review, Revision of IEP (34 C.F.R. § 300.324)

- This regulation details, among other things, the factors that must be considered when developing an IEP, when an IEP can be amended without an IEP Team meeting, the annual review requirement, and when an IEP must be revised.
- 34 C.F.R. § 300.324(b)(1)(ii) says that “Each **public agency must ensure** that. . . the IEP Team revises the IEP, as appropriate, to address any lack of expected progress toward the annual goals. . . .”

# Development, Review, Revision of IEP 2

- At beginning of the school year, kindergarten student began hitting, scratching, and biting as documented on daily communication between parent and teacher
- Despite frequency and escalation, IEP Team meeting not held until parent requested in September 2021; No documentation in September 2021 IEP of discussion of behavioral data, no positive behavioral interventions or supports included, and IEP states student does **not** have interfering behaviors
- Behaviors continued and at least two more IEP Team meetings held, but no behavior goals or behavior intervention plan; District waited 6 months before seeking consent to conduct an FBA

# Development, Review, Revision of IEP 3

- After no bus monitor was available for the student, the parent requested homebased services until transportation was restored; IEP Team meeting held, but district failed to address parent's request.
- In systemic complaint, for 2 of the 12 students, IEPs were not reviewed and revised to address stagnate progress and regression on annual goals; for 1 student, the IEP was not reviewed and revised to address mastery of annual goals
- Student's annual review was due on October 27, 2021, but annual review IEP not completed until March 23, 2022

# Development, Revision, Revision of IEP - What you need to think about...

- Making sure that IEP Teams consider parent information in a timely manner
- Not waiting for the parent to ask for an IEP Team meeting (the burden is on the public agency)
- Honoring parent's right to request an IEP Team meeting
- Ensuring timely annual review IEP Team meetings (start scheduling early!!!)



# Least Restrictive Environment (LRE)

# Least Restrictive Environment (LRE) (34 C.F.R. §§ 300.114-300.117)

- These regulations address the student being educated with students without disabilities, “to the maximum extent appropriate,” the availability and consideration of the full continuum of alternative placements, requirements for placement decisions, and provision of nonacademic and extracurricular services and activities.

# Least Restrictive Environment (LRE) 2

- IEP Team determined the student would receive homebased instruction for the last month of school following a short-term suspension; however, the IEP Team did not amend the student's placement or provide justification for more restrictive placement.
- Student not making progress academically or behaviorally at the alternative school; IEP Team determined home based instruction was student's LRE but failed to include a [reintegration plan](#).

# Least Restrictive Environment (LRE) 3

- Parent provided hospital homebound (HHB) paperwork in accordance with [State HHB Rule](#) to district for student to attend “medically necessary” 8-week feeding program
- IEP Team “denied” HHB and district later argued that HHB was not the student’s LRE
- District failed to provide the full continuum of alternative placements to meet the needs of the student, including HHB and homebased services.

# LRE - What you need to think about...

- Making sure that IEPs document why students will not have access to non-disabled peers
- Making sure that LRE determinations are based on the individual student and not the availability of resources and supports in the district
- Making sure the full continuum of alternative placements is available and considered, as appropriate

# Prior Written Notice

# Prior notice by the public agency; content of notice (34 C.F.R. § 300.503(a))

- Written notice
- Given to parents of a child with a disability
- A reasonable time before the public agency:
  - Proposes or Refuses to initiate or change:
    - the identification of the child
    - the evaluation of the child
    - the educational placement of the child
    - the provision of a free appropriate public education (FAPE) to the child
- Meets seven (7) requirements of 34 C.F.R. § 300.503(b)



# Prior Written Notice

- During an “informal meeting” on July 29, 2022, with parent, special education director, special education teacher, assistant principal, and two general education teachers, the parent discussed the need for a behavior intervention plan (BIP) for the student due to off-task behavior and asked for an evaluation; the district staff said the student was being supported in the classroom and was not in current need of a BIP or evaluation
- On August 17, 2022, the parent emailed the district rejecting the “school-wide behavior plan” they sent to her and reasserting her request for a BIP and FBA; Parent also filed the state complaint the same day.
- PWN was not provided to the parent until after an IEP Team meeting on August 25, 2022

## U.S. Department of Education, Office of Special Education Programs (OSEP) Letter to Chandler, April 26, 2012

- “There is no requirement in the [IDEA] regarding the point at which the written notice must be provided as long as it is provided a reasonable time **before** the LEA actually implements [or refuses to implement] the action.”
- “This provides parents, in the case of a proposal or refusal to take action, a reasonable time to fully consider the change and respond to the action before it is implemented.”
- **PWN must be provided “irrespective of whether or not the proposal or refusal is made during the course of an IEP Team meeting. . . .”**

# PWN - What you need to think about...

- Make sure that PWNs are provided within a reasonable time before the district implements or refuses to implement the action.
- If using documents such as IEPs to serve as PWN, they must meet all 7 requirements of IDEA's PWN requirements.

# When IEPs must be in effect (34 C.F.R. § 300.323)

- Student initially determined eligible for special education and related services under emotional behavioral disorder (EBD) on November 4, 2021; initial IEP developed on November 12, 2021, with implementation date of January 20, 2022. Parental consent for services was not provided until January 19, 2022.
- No documentation that student's general education co-teacher was aware of student's IEP accommodations when she enrolled in her class in March 2022.

# Other IDEA violations

- IEP Team ([34 C.F.R. § 300.321](#))
  - General education co-teacher filed a systemic complaint on behalf of 10 students in her class alleging that she had only participated in one student's IEP Team meeting; Seven student's IEP Team meetings included another general education teacher of the students, but other two students had no general education teacher in attendance or written excusal.
- Related Services ([34 C.F.R. § 300.34](#))
  - For first three days of school, no bus provided in afternoon to take student home

# Other IDEA violations

- Discipline Procedures ([34 C.F.R. § 300.530](#))
  - Student received 10 days OSS after a fight; Determined not to be a manifestation of the disability; student received 10 more days OSS after another fight; no documentation that student received special education services on the 11th day of OSS

**Highlights from:**  
**Questions and Answers:**  
**Addressing the Needs of Children**  
**with Disabilities and IDEA's**  
**Discipline Provisions**

U.S. Department of Education  
(USED), Office of Special Education  
Programs (OSEP) Q&A 22-02  
Issued on July 19, 2022





# Children with Disabilities with Behavioral Needs

- For children whose behavior impedes their learning or the learning of others, IEP Teams must consider the **use of positive behavioral interventions and supports**, and other strategies, to address that behavior. 34 C.F.R. § 300.324(a)(2)(i), (A-3)
- The failure of the IEP Team to consider and provide for needed behavioral supports through the IEP process may result in a child **not receiving a meaningful educational benefit or FAPE.**
- “It is critical that IDEA provisions designed to support the needs of children with disabilities and ensure FAPE are appropriately implemented so as to **avoid an overreliance on, or misuse of, exclusionary discipline** in response to a child’s behavior.” (A-6)



# Exclusionary Discipline

- Not defined in IDEA
- In this Q&A, it refers to the **removal**, whether on a short-term or long-term basis, of a **child with a disability** from a **class, school, or other educational program or activity** for **violating a school rule or code of conduct**.
- Examples can include detention, in-school suspensions, out-of-school suspensions, suspensions from riding the school bus, expulsions, disciplinary transfers to alternative schools, and referrals to law enforcement, including referrals that result in school-related arrest.

# Informal Removals

- Not defined in IDEA
- Actions taken by school personnel in response to a child's behavior that excludes the child for **part or all of the school day**, or even an **indefinite period of time**.
- Could include administratively shortened school days when a child's school day is reduced by school personnel, outside of the IEP Team and placement process, in response to the child's behavior.
- Could include when a child with a disability is not allowed by the teacher to attend an elective course because of behavioral concerns. (C-1)

# What actions count toward a change of placement?

- Actions that result in **denials of access to, and significant changes in, a child's educational program** could all be considered as part of the 10 days of suspension and also could constitute an improper change of placement. (C-1)

# What actions count toward a change of placement? 2

- This could include **in-school suspension** and **informal removals** unless:
  - The child is afforded the opportunity to continue to appropriately participate in the general curriculum;
  - The child continues to receive the services specified in his or her IEP; **and**
  - The child continues to participate with nondisabled students to the extent he or she would have in his or her current placement. 71 Fed. Reg. 46715 (2006) (C-1)

# Continuation of Services

- Regardless of whether the violation was a manifestation of the child's disability, **after the 10<sup>th</sup> day of the removal**, the child **must** receive educational services, as provided in 34 C.F.R. § 300.101(a) (Free Appropriate Public Education), so as to enable the child to continue to participate in the general education curriculum, although in another setting, **and** progress toward meeting the goals outlined in the child's IEP. See 34 C.F.R. § 300.530(b)(2), (d)(1).
- This includes expulsion and alternative settings.

# FY22 Out of School Suspension Analysis - ≤ 10 Days

Race-ethnicity	(OSS) ≤ 10 Days	Percent of Total OSS ≤ 10 Days	Percent of Total SWD Enrollment	Difference Between % OSS & % Enrollment
American Indian	36	0.17%	0.2%	-0.03
Asian	111	0.52%	2.2%	-1.68
Black	12,504	58.50%	38.9%	+19.60
Hispanic	2,324	10.87%	16.4%	-5.53
Two or More Races	949	4.44%	4.3%	+0.14
Pacific Islander	9	0.04%	0.1%	-0.06
White	5,443	25.46%	38.0%	-12.54
<b>Total</b>	<b>21,376</b>	<b>100.00%</b>	<b>100.0%</b>	

Source: Student Record, FY22 (June 2022)



YOU? YOU'RE AWESOME.  
YOU WERE MADE THAT WAY.

YOU WERE MADE  
FROM LOVE  
TO BE LOVED  
TO SPREAD LOVE.

LOVE IS ALWAYS LOUD.  
-KID PRESIDENT

*Demonstrate*  
**LOVE**





# Contact Me

## *I'm Here to Help!*

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Dispute Resolution

Division for Special Education Services and Supports

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[www.gadoe.org](http://www.gadoe.org)

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 [youtube.com/user/GaDOEmedia](https://youtube.com/user/GaDOEmedia)



**EDUCATING  
GEORGIA'S FUTURE**