

JURISDICTION:

The hearing was conducted and this decision was written pursuant to the *Individuals with Disabilities Act* (“IDEA”), P.L. 101-476, as amended by P.L. 105-17 and the *Individuals with Disabilities Education Improvement Act of 2004*, the District of Columbia Code, Title 38 Subtitle VII, and the District of Columbia Municipal Regulations, Title 5 [Chapter E30](#). The Due Process Hearing was convened on February 3, 2014, and concluded on February 26, 2014, at the District of Columbia Office of the State Superintendent of Education (“OSSE”) Student Hearing Office 810 First Street, NE, Washington, D.C. 20003, in Hearing Room 2006 and Hearing Room 2003 respectively.

BACKGROUND AND PROCEDURAL HISTORY:

The student is attending a DCPS school (“School A”). On January 30, 2013, the student’s parent requested DCPS evaluate the student for special education. DCPS conducted evaluations of the student in May 2013 and convened an eligibility meeting on May 24, 2013, at which the student was determined ineligible for special education.

The parent disagreed with DCPS’ evaluation and requested an independent evaluation. A due process complaint was subsequently filed that resulted in a settlement agreement that granted the parent an independent psychological evaluation. The independent evaluation was completed on October 9, 2013. It diagnosed the student with Attention Deficit Hyperactivity Disorder (“ADHD”) and Disruptive Mood Dysregulation Disorder.

DCPS convened an eligibility meeting on November 13, 2013, and reviewed the independent evaluation and found the student ineligible. On November 26, 2013, Petitioner filed the due process complaint asserting DCPS inappropriately found the student ineligible at the November 13, 2013, meeting. Petitioner seeks as relief that the Hearing Officer find the student eligible and direct DCPS to develop an IEP and propose an appropriate educational placement and provide compensatory education.²

DCPS filed a response to the complaint on December 3, 2013. DCPS asserted the ineligibility determination was correct and although the student has mild deficits they did not warrant special education.

A resolution meeting was held December 11, 2013. Nothing was resolved. The parties did not mutually agree to proceed to hearing. The 45-day period began on December 27, 2013, and originally ended (and the Hearing Officer’s Determination (“HOD”) was originally due) on February 9, 2014.

The Hearing Officer convened a pre-hearing conference in this matter on January 10, 2014, and issued a pre-conference order outlining, inter alia, the issue to be adjudicated.

² Petitioner also sought an independent speech/language evaluation (“IEE”) as relief. However, it is the Hearing Officer’s understanding that the parties agreed that DCPS would provide Petitioner an IEE authorization thus that relief was no longer being sought from the Hearing Officer.

The parties appeared for hearing on February 9, 2014. Petitioner completed its case but insufficient time remained for Respondent to present its case and Respondent requested and was granted a continuance and extension of the decision due date for ten calendar days. Petitioner opposed the continuance and extension of the decision due date. The hearing was scheduled to resume and conclude on February 13, 2014. OSSE and DCPS were closed due to inclement weather on February 13, 2014. Respondent requested a second continuance and extension of the decision due date that Petitioner also opposed. The Hearing Officer recommended, and the Chief Hearing Officer granted, the second continuance and extension of the due date for fifteen calendar days. The HOD is now due March 6, 2014. The hearing resumed and was completed on February 26, 2014.

ISSUE:³

The issue adjudicated is:

Whether DCPS denied the student a free and appropriate public education (“FAPE”) by failing to find the student eligible for special education services at the November 13, 2013, eligibility meeting under either the OHI (for ADHD) or ED classification(s).

RELEVANT EVIDENCE CONSIDERED:

This Hearing Officer considered the testimony of the witnesses and the documents submitted in the parties’ disclosures (Petitioner’s Exhibits 1 through 24) and Respondent’s Exhibits 1 through 10) that were all admitted into the record and are listed in Appendix A. Witnesses a listed in Appendix B.

FINDINGS OF FACT:⁴

1. The student is attending School A. The student resides with his parents in the District of Columbia. (Father’s testimony, Petitioner’ Exhibit 2-1)
2. The student’s father believes the student has problems with his memory, speed of learning and how he processes information. He may forget instructions and need them repeated. The student’s father helps him with his homework about three times per week and has observed that the student forgets his homework, pauses a lot, daydreams and likes for his father to give him the answers. The student’s teacher has told the parents

³ The alleged violation(s) and/or issue(s) listed in the complaint or in the pre-hearing order may not directly correspond to the issues outlined here. The Hearing Officer restated the issue(s) at the outset of the hearing and the parties agreed that these were the issue(s) to be adjudicated.

⁴ The evidence that is the source of the Finding of Fact (“FOF”) is noted within a parenthesis following the finding. The second number following the exhibit number denotes the page of the exhibit from which the fact was extracted. When citing an exhibit that has been submitted by more than one party separately the Hearing Officer may only cite one party’s exhibit.

that the student recently seems to be doing better in school. However, the student's parents think things are about the same as they were at home and they have seen no improvement. The student avoids reading and sometimes fights with the other kids. (Mother's testimony, Father's testimony)

3. During school year ("SY") 2012-2013 the student was in kindergarten at School A. His report that year card rated him as "basic" in reading, language arts, math, science and social studies. He was rated as "proficient" in art, music and physical education. In work habits he was rated as needing "frequent prompting," but he was rated "independent" in working well with others. His teacher stated that he displayed standard achievement and knowledge of skills in some areas but he was not fully able to stay up with his class. (Petitioner's Exhibit 11-1, 11-2)
4. On January 30, 2013, while the student was in kindergarten at School A the student's parent requested DCPS evaluate the student. DCPS conducted an educational assessment - Woodcock Johnson III ("WJ-III") and a psychological evaluation of the student on May 7, 2013, and May 8, 2013, respectively. (Petitioner's Exhibits 1, 2, 3)
5. The May 7, 2013, WJ-III was administered when the student was age six, six months (6-6) and in kindergarten. Generally, the student was operating at or near first grade level in the areas measured. The student had the following scores:
 6. The DCPS May 7, 2013, psychological evaluation found that both the student's cognitive scores and academic achievement were average. (Petitioner's Exhibit 2-16)
 7. DCPS convened an eligibility meeting on May 24, 2013, and found the student ineligible for special education. (Petitioner's Exhibit 5)
 8. The parent disagreed with DCPS' psychological evaluation and requested an independent evaluation. A due process complaint was subsequently filed that resulted in a settlement agreement that granted Petitioner an independent psychological evaluation. (Petitioner's Exhibits 6, 7, 9)
 9. The independent evaluation was completed on October 9, 2013. The evaluation included an assessment of the student's cognitive abilities using the Wechsler Intelligence Scale for Children-Fourth Edition (WISC-IV). It also assessed the student's academic functioning and his social emotional functioning. It diagnosed the student with Attention

Deficit Hyperactivity Disorder (“ADHD”) and Disruptive Mood Dysregulation Disorder and recommended the student be found eligible for special education services and that he be provided individualized instruction in reading, math and written expression. (Petitioner’s Exhibit 11-13, Respondent’s Exhibit 5-1)

10. The independent evaluation measured the student’s cognitive functioning by analyzing four functional skills areas: verbal comprehension, perceptual reasoning, processing speed and working memory through a subtest of the WISC-IV. The student’s functioning in three of the areas was average. However, the student scored far below average on the working memory subtest. Consequently, the evaluator opined that it is difficult for the student to hold things in his memory and calmly find ways to connect information in a pattern for use. His working memory was not assessed in the May 2013 DCPS psychological evaluation. (Witness 1’s testimony)
11. The independent evaluator administered the Wide Range Achievement Test 4th Edition (WRAT4) that measured the student’s spelling, reading and math calculation. The student had the following scores in each of those areas: Spelling: 86 (Low Average), Reading: 79 (Borderline), Math Computation: 98 (Average). (Witness 1’s testimony, Petitioner Exhibit 11-9)
12. In addition, the student had a low score in reading comprehension based upon his score on the Dynamic Indicators of Basic Literacy Skills (“DIBELS”) administered by the independent evaluator. The evaluator determined the student struggled with consonant and vowels, was not recognizing patterns and had difficulty reading basic site words. (Witness 1’s testimony, Petitioner’s Exhibit 11-6, 11-9, 11-13)
13. The evaluator stated in his evaluation that the student appeared of have a mild “learning disability” related to is difficulty in some areas of learning. The evaluator diagnosed the student with ADHD and Disruptive Mood Dysregulation Disorder. The evaluator concluded that because of the student’s ADHD diagnosis and inattention the student should be provided full-time individualized academic instruction in reading, math and written expression in a special education setting with a low teacher to student ratio. He also recommended the student be provided counseling. (Petitioner’s Exhibit 11-6, 11-12, 11-13)
14. Petitioner provided DCPS the independent evaluation on October 16, 2013. (Petitioner’s Exhibits 10, 11)
15. DCPS conducted a speech/language evaluation on October 4, 2013. Petitioner disagreed with that evaluation and requested an independent evaluation. (Petitioner’s Exhibit 4)
16. On November 10, 2013, DCPS conducted a review of the independent psychological evaluation. The reviewer was the DCPS psychologist who conducted the May 2013 psychological evaluation. The reviewer cited a number of concerns with conclusions and recommendations of the independent evaluation, specifically that the conclusion that the student’s score on the working memory subtest is indicative of a learning disability. The

reviewer thought the such a conclusion was premature. (Witness 7's testimony, Petitioner's Exhibit 16)

17. The DCPS reviewer stated the following in the review regarding the independent evaluators conclusion the student had a learning disability: "Such difference can be one factor in determining the presence of a learning disability. In this instance the student performed very poorly on one subtest and making the determination of a disability on one subtest is inappropriate. The previous evaluation did not examine working memory as it was not a part of the test protocol and no specific concerns with memory had been raised. To determine if the student in fact has memory deficits to a significant enough degree to be considered a learning disability more comprehensive assessment of his memory functions such as with the Wide Range Assessment of Memory and Learning (WRMAL-2) is warranted." (Witness 7's testimony, Petitioner's Exhibit 16)
18. DCPS convened an eligibility meeting on November 13, 2013, and reviewed the evaluations and found the student ineligible. The eligibility team at the November 13, 2013, meeting considered the student's eligibility under three disability classifications: specific learning disability ("SLD"), emotional disability or emotional disturbance ("ED") and other health impairment ("OHI"). The team filled out a disability worksheet for each classification and found the student was not eligible under any of the three disability classifications considered. One of the disability work sheets noted the following "Inattention noted during observation which impacts performance." (Respondent's Exhibit 2, 3, 4, 6)
19. The eligibility team agreed the student had ADHD but disagreed whether he was eligible because of it. During the meeting the DCPS psychologist reviewed her review of the independent evaluation but the team did not have the written review report. The parent's educational advocate who attended the meeting with the parents thought that the student's ADHD was impacting him academically because of his reading, phonics and difficulty with homework and expressed that to the team. The student's teacher reported she had just started after school tutoring with student and that he was having some trouble with mechanics of math and with reading and he wasn't turning in homework. (Witness 4's testimony, Petitioner's Exhibit 17)
20. The independent evaluator in his testimony during the hearing suggested the student would qualify for special education under the emotional disturbance ("ED") disability classification. However, he hedged on the other health impairment ("OHI") classification, as he thought the student's ADHD would have to be handled or managed by the professionals through medication and behavior management and would require some coordination during the school day. He stated that the student was showing some emotional side effects of his learning difficulties and his primary area of concern is the attention issues and secondarily his Mood Dysregulation. (Witness 1's testimony)
21. The independent evaluator opined that the student's cognitive difficulty causes him to avoid the academic tasks he finds difficult and to "space out." The evaluator stated that the student could be classified under the ED classification but then on the other hand

stated that the student does not have an emotional disturbance but his primary condition is attention and concentration that affects him emotionally and causes him “to respond in ways that are not helpful.” The independent evaluator stated if [the student] did not have the working memory very low score by comparison to his abilities in other areas we would not have reason to consider any special education needs. (Witness 1’s testimony)

22. On November 20, 2013, Petitioner disagreed with the October 4, 2013, DCPS speech language evaluation and requested an independent speech/language evaluation. (Petitioner’s Exhibit 18)
23. The student has been receiving tutoring from a private tutor from August to November 2013 focusing on his reading problems and math skills. The tutor recommended that most of the tutoring be focused on the student’s reading. The tutor determined that the student has problems with sounds and word endings. The student had reading fluency problems and spent a lot of time decoding words, word recognition, poor blending and poor segmenting into phonemes and problems with sight words that any first grader should be able to learn. He had attention problems and his attention would wane after a period of time. With the tutor the student has made some progress in phonemic awareness skills and sight words. (Witness 2’s testimony)
24. The student’s academic performance has improved since he began in first grade. It was a new setting for him moving from kindergarten but he seems now to have adjusted. The student performs better in math than reading. The student was behind the targeted reading level when he entered first grade but has made some progress and may be on course to meet the desired target level by the end of the school year. There is a special education teacher in his classroom along with the general education teacher who assists all students and both teachers provide all the students small group instruction. There are a total of twenty students in the classroom. The student is now being provided tutoring in reading after school by his classroom teacher. He is well liked by his peers and does not have behavior problems in the classroom. (Witness 5’s testimony)
25. The student’s most recent report card from School A was issued on January 27, 2014. The report card indicates that during the first advisory of SY 2013-2014 the student was operating at “Below Basic” in Reading and Writing & Language and at “Basic” in all other areas. In the second advisory the student was rated at “Basic” in all areas including Reading and Writing & Language. (Respondent’s Exhibit 9)
26. On December 18, 2013, DCPS considered the student for a 504 plan and determined that he was not eligible for 504 plan. DCPS concluded the student had mild restriction due to his inattention and the teacher was remediating that by prompting him. The two teachers in the student’s classroom believed the student’s attention issue can be addressed in the classroom without any additional services or accommodations. The student’s parent was not a part of the December 18, 2013, meeting. (Witness 3’s testimony, Respondent’s Exhibit 8)

CONCLUSIONS OF LAW:

Pursuant to IDEA §1415 (f)(3)(E)(i) a decision made by a hearing officer shall be made on substantive grounds based on a determination of whether the child received a free appropriate public education (“FAPE”).

Pursuant to IDEA §1415 (f)(3)(E)(ii) in matters alleging a procedural violation a hearing officer may find that a child did not receive FAPE only if the procedural inadequacies impeded the child’s right to FAPE, significantly impeded the parent’s opportunity to participate in the decision making process regarding provision of FAPE, or caused the child a deprivation of educational benefits. An IDEA claim is viable only if [DCPS’] procedural violations affected the student’s substantive rights.” *Lesesne v. District of Columbia*, 447 F.3d 828, 834 (D.C. Cir. 2006)

34 C.F.R. § 300.17 provides:

A 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 (d) Are provided in conformity with an individualized education program (IEP) that meets the requirements of Sec. 300.320 through 300.324

Pursuant to 5E DCMR 3030.14 the burden of proof is the responsibility of the party seeking relief.⁵ *Schaffer v. Weast*, 546 U.S. 49, 126 S.Ct. 528 (2005). In this case the student/parent is seeking relief and has the burden of proof that the action and/or inaction or proposed placement is inadequate or adequate to provide the student with FAPE.

Based solely upon the evidence presented at the due process hearing, an impartial hearing officer must determine whether the party seeking relief presented sufficient evidence to prevail. See DCMR 5-3030.34. The normal standard is preponderance of the evidence. See, e.g. *N.G. V. District of Columbia* 556 f. Sup. 2d (D.D.C. 2008) se also 20 U.S.C. §1451 (i)(2)(C)(iii).

ISSUE: Whether DCPS denied the student a FAPE by failing to find the student eligible for special education services at the November 13, 2013, eligibility meeting under either the OHI (for ADHD) or ED classification(s).

Conclusion: There was inconclusive and contradictory evidence presented that the student has a disability that requires special education and that he should yet be determined eligible as a child

⁵ The burden of proof shall be the responsibility of the party seeking relief. Based solely upon the evidence presented at the hearing, an impartial hearing officer shall determine whether the party seeking relief presented sufficient evidence to meet the burden of proof.

with a disability under IDEA. However, there was sufficient evidence that DCPS has yet to fully evaluate the student to conclusively determine whether is eligible on ineligible.

Thus, the Hearing Officer concludes that the requested relief of an eligibility finding by the Hearing Officer is inappropriate. Nonetheless, the Hearing Officer directs in the Order below that DCPS fully evaluate the student's cognitive processing abilities particularly his working memory along with any other evaluations that are pending completion and a make a final determination on the student's eligibility for special education services.

To be eligible for special education services a child must be evaluated as having mental retardation, a hearing impairment (including deafness), a speech or language impairment, a visual impairment (including blindness), a serious emotional disturbance, an orthopedic impairment, autism, traumatic brain injury, an other health impairment, a specific learning disability, deaf-blindness, or multiple disabilities, and who, by reason thereof, needs special education and related services. 34 CFR § 300.8 (emphasis supplied.) See *Parker v. Friendship Edison Public Charter School*, 577 F.Supp.2d 68, 74 (D.D.C.2008).⁶

Petitioner asserted that the student could and should be found eligible under the ED or OHI classification for ADHD. There was no assertion in the complaint or in the issue that was stylized in the prehearing order that the student is eligible under the SLD classification. Petitioner only sought to challenge the student's ineligibility under ED and OHI.

The evidence including expert testimony interpreting evaluative data clearly demonstrates the student has average cognitive abilities except in the area of working memory and that this area may require further exploration to determine if the student has cognitive processing deficits that result in a disability under IDEA.⁷ Although the student has ADHD the evidence was insufficient that his condition is impacting him in his current classroom such that he is in need of special education.⁸

⁶ 34 C.F.R. §300.8 provides:

Child with a disability.

(a) General.

(1) Child with a disability means a child evaluated in accordance with Sec. Sec. 300.304 through 300.311 as having ... [listed disabilities] and who, by reason thereof, needs special education and related services.

(2) (i) Subject to paragraph (a)(2)(ii) of this section, if it is determined, through an appropriate evaluation under Sec. Sec. 300.304 through 300.311, that a child has one of the disabilities identified in paragraph (a)(1) of this section, but only needs a related service and not special education, the child is not a child with a disability under this part.

(ii) If, consistent with Sec. 300.39(a)(2), the related service required by the child is considered special education rather than a related service under State standards, the child would be determined to be a child with a disability under paragraph (a)(1) of this section.

⁷ FOF # 17

⁸ FOF # 24, 25

Petitioner's expert witness provided confusing and to some degree contradictory testimony regarding the student's eligibility. In one respect he said the student has a learning disability but he did not indicate that the learning disability meets the criteria for SLD that is required under IDEA. He also at one point stated that the student would qualify under the ED classification and then stated that the student does not have an emotional disturbance, rather he has an emotional reaction to academic difficulties. On the one hand he testified that the student would qualify under the OHI classification for ADHD but then stated that the student's ADHD could be managed through medication and behavior management rather than the student specifically needing special education for the condition.⁹

As to working memory Petitioner's expert witness stated that if the student's working memory were on par with the other three areas of his cognitive functioning that he measured as average, then he would not be considering special education services for the student at all. Thus, based upon his testimony it is unclear just what condition would qualify the student as a child with disability that requires special education.

However, it is clear from DCPS' expert witness that if the student has an issue with regard to working memory then that area should be further evaluated to determine the true impact on the student's cognitive and academic functioning. This was not an area that was explored in by the DCPS evaluator in her evaluation. At the time she conducted the evaluation there was no issue, as there appears to be now based upon the independent evaluation, with the student's working memory. An agency is required under IDEA to evaluate in all areas of suspected disability. The DCPS expert witness indicated that type of instrument that can be used to effectively explore this area of concern in the student's functioning.¹⁰

Despite the fact that there was no specific challenge to the any evaluation, there was an inherent challenge to DCPS determining the student ineligible. The Hearing Officer concludes that DCPS' determination that the student is ineligible was premature without additional evaluations and therefore directs in the Order below that DCPS convene a student evaluation team meeting with the parents included to determine what areas will be explored regarding the student's cognitive abilities particular working memory and his current academic achievement along with any subsequent evaluation that may be available to determine if the student qualifies as a child with a disability under IDEA.

Pursuant to 34 C.F.R. § 300.306¹¹ a school district must ensure that after a student has been

⁹ FOF # 20, 21

¹⁰ FOF #17

¹¹ 34 C.F.R. § 300.306 provides:

Determination of eligibility.

(a) General. Upon completion of the administration of assessments and other evaluation measures-

(1) A group of qualified professionals and the parent of the child determines whether the child is a child with a disability, as defined in Sec. 300.8, in accordance with paragraph (b) of this section and the educational needs of the child; and... A child must not be determined to be a child with a disability under this part--

(1) If the determinant factor for that determination is--

appropriately evaluated for special education and that a group of qualified professionals and the parent of the child determines whether the child is a child with a disability, as defined in § 300.8. D.C. law requires that a "a full and individual evaluation is conducted for each child being considered for special education and related services." D.C. Mun. Regs. Title. 5E, § 3005.1 (2006). "Qualified evaluators [are to] administer tests and other assessment procedures as may be needed to produce the data required" for the MDT to make its determinations. D.C. Mun. Regs. Title. 5E § 3005.5 (2006).

The evaluators shall utilize "a variety of assessment tools and strategies [to] gather relevant functional and developmental information about the child, including information provided by the parent, and information related to enabling the child to be involved in and progress in the general curriculum ... that may assist in determining whether the child is a child with a disability." D.C. Mun. Regs. Title 5E § 3005.9(b).

All areas "related to the suspected disability" should be assessed, including: academic performance, health, vision, hearing, social and emotional status, general intelligence (including cognitive ability and adaptive behavior), communicative status, and motor abilities. D.C. Mun. Regs. Title. 5E § 3005.9(g). The evaluations must be "sufficiently comprehensive to identify all of the child's special education and services needs." D.C. Mun. Regs. Title 5E § 3005.9(h) (2006).

It is clear from the evidence that the student has reading difficulties and is not functioning at his grade level in that area. The educators working with the student include a general education teacher and a special education teacher and it appears that the student is receiving small group instruction with students some of whom are presumably receiving special education services along side him. In addition, the student's classroom teacher is providing him extra tutoring after school. This extra tutoring, however, is not mandatory for DCPS to provide. Despite the student's reading deficits he has made some progress since being in first grade. In light of these circumstances the Hearing Officer finds it all the more necessary to reassess the student to determine his level of progress with standardized testing to fully evaluate the student's functioning as IDEA requires.

Compensatory Education

Under the theory of compensatory education, "courts and hearing officers may award educational services ... to be provided prospectively to compensate for a past deficient program. The inquiry must be fact-specific and, to accomplish IDEA's purposes, the ultimate award must be reasonably calculated to provide the educational benefits that likely would have accrued from special education services the school district should have supplied in the first place." *Reid, 401*

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- (i) Lack of appropriate instruction in reading, including the essential components of reading instruction (as defined in section 1208(3) of the ESEA);
 - (ii) Lack of appropriate instruction in math...or
 - (iii) Limited English proficiency; and
- (2) If the child does not otherwise meet the eligibility criteria under Sec. 300.8(a).

F.3d 522 & 524. To aid the court or hearing officer's fact-specific inquiry, "the parties must have some opportunity to present evidence regarding [the student's] specific educational deficits resulting from his loss of FAPE and the specific compensatory measures needed to best correct those deficits." *Id.* at 526.

Petitioner has requested compensatory education but the Hearing Officer has not determined that the student is eligible, therefore, the Hearing Officer concludes that an award of compensatory education is not appropriate.

ORDER:¹²

1. DCPS shall within ten (10) school days of the issuance of this Order convene a student evaluation plan ("SEP") meeting with the parents included to determine the areas that should be evaluated regarding the student's cognitive functioning including his working memory along with evaluating his current academic achievement.
2. Within thirty (30) calendar days of the SEP meeting DCPS shall conduct and complete the evaluations that are determined appropriate to conduct at the SEP meeting.
3. Within ten (10) school days of the completion of the last of the evaluations conducted pursuant to the SEP, DCPS shall convene an eligibility team meeting and review the results of those evaluations and any additional evaluations that have been obtained or completed and determine if the student qualifies as a child with a disability under IDEA.
4. All other requested relief is denied.

APPEAL PROCESS:

The decision issued by the Hearing Officer is final, except that any party aggrieved by the findings and decision of the Hearing Officer shall have 90 days from the date of the decision of the Hearing Officer to file a civil action with respect to the issues presented at the due process hearing in a District Court of the United States or a District of Columbia court of competent jurisdiction, as provided in 20 U.S.C. §1415(i)(2).

/S/ Coles B. Ruff

Coles B. Ruff, Esq.
Hearing Officer
Date: March 6, 2014