

**DISTRICT OF COLUMBIA
OFFICE OF THE STATE SUPERINTENDENT OF EDUCATION**

Office of Dispute Resolution
1050 First Street, N.E., Third Floor
Washington, D.C. 20002

| | | |
|-------------------------------------|---|--|
| <i>Student</i> , ¹ |) | Case No.: 2024-0050 |
| through <i>Parent</i> , |) | |
| <i>Petitioner</i> , |) | Date Issued: 6/4/24 |
| |) | |
| v. |) | Hearing Officer: Keith L. Seat, Esq. |
| |) | |
| District of Columbia Public Schools |) | Hearing Dates (using Microsoft Teams): |
| ("DCPS"), |) | 5/28/24 & 5/30/24 |
| Respondent. |) | |
| |) | |

HEARING OFFICER DETERMINATION

Background

Petitioner, Student’s Parent, pursued a due process complaint alleging that Student had been denied a free appropriate public education (“FAPE”) in violation of the Individuals with Disabilities Education Improvement Act (“IDEA”) due to DCPS’s failure to comprehensively evaluate Student and allow access to all education records. DCPS responded that it is conducting necessary evaluations and has provided all available education records.

Subject Matter Jurisdiction

Subject matter jurisdiction is conferred pursuant to the IDEA, 20 U.S.C. § 1400, *et seq.*; the implementing regulations for IDEA, 34 C.F.R. Part 300; and Title V, Chapter A30, of the District of Columbia Municipal Regulations (“D.C.M.R.”).

Procedural History

Following the filing of the due process complaint on 3/22/24, the case was assigned to the undersigned on 3/25/24. Respondent filed a response on 3/29/24 and did not challenge jurisdiction. A resolution meeting took place on 4/4/24, but the parties did not

¹ Personally identifiable information is provided in Appendix A, including terms initially set forth in italics. Personal pronouns and other terms that would indicate Student’s gender are omitted.

Hearing Officer Determination

Case No. 2024-0050

settle the case or shorten the 30-day resolution period, which ended on 4/21/24. A final decision in this matter must be reached no later than 45 days following the end of the resolution period, which requires a Hearing Officer Determination (“HOD”) by 6/5/24.

A prehearing conference was held on 5/13/24 and a Prehearing Order was issued on 5/16/24, addressing among many other things the use of a videoconference platform to conduct the due process hearing. The due process hearing took place on 5/28/24 and 5/30/24, and was open to the public. Petitioner was represented by *Petitioner’s counsel*. DCPS was represented by *Respondent’s counsel*. Petitioner participated in much of the hearing.

Documents and Witnesses

Petitioner’s Disclosure, submitted on 5/20/24, contained documents P1 through P38, all of which were admitted into evidence without objection. Respondent’s Disclosure, also submitted on 5/20/24, contained documents R1 through R9, all of which were admitted into evidence without objection.²

Petitioner’s counsel presented 3 witnesses in Petitioner’s case-in-chief (*see* Appendix A):

1. *Educational Advocate* (qualified without objection as an expert in Special Education)
2. *Legal Assistant*
3. Parent

Respondent’s counsel presented 2 witnesses in Respondent’s case (*see* Appendix A):

1. *Special Education Coordinator* (qualified without objection as an expert in Special Education)
2. *School Psychologist* (qualified without objection as an expert in School Psychology)

Petitioner’s counsel offered no rebuttal evidence.

Issues and Relief Requested

The issues to be determined in this Hearing Officer Determination are:

² Citations herein to the parties’ documents are identical except that Petitioner’s documents begin with a “P,” while Respondent’s documents begin with an “R,” followed by the exhibit number and then a “p” (for page) and the Bates page number or numbers (which are numbered consecutively through to the end of the exhibits), with any leading zeros omitted.

Hearing Officer Determination

Case No. 2024-0050

Issue 1: Whether DCPS denied Student a FAPE by failing to timely and comprehensively evaluate Student for special education services during 2022/23³ and/or 2023/24 by conducting (a) a comprehensive psychological evaluation, (b) a functional behavioral assessment (“FBA”), and/or (c) an occupational therapy evaluation pursuant to child-find obligations and/or Parent’s written request for evaluations. (*Petitioner has the burden of persuasion on this issue.*)

Issue 2: Whether DCPS denied Student a FAPE by failing to allow Parent full access to education records. (*Petitioner has the burden of persuasion on this issue.*)

Relief Requested by Petitioner:

1. A finding that Student has been denied a FAPE.
2. DCPS shall provide Parent access to specified types of education records.
3. DCPS shall immediately conduct or fund evaluations, including (a) a comprehensive psychological evaluation, (b) a functional behavioral assessment, (c) an occupational therapy evaluation, and any additional evaluations warranted by the results of these.
4. After the evaluations in the prior paragraph are completed, DCPS shall convene a multi-disciplinary team (“MDT”) meeting to address eligibility and, if eligible, immediately develop and implement an Individualized Education Program (“IEP”).
5. If Student is found eligible, DCPS shall provide compensatory education for any denials of FAPE at that time.⁴
6. Any other just and reasonable relief.

Findings of Fact

After considering all the evidence, as well as the arguments of counsel, the Findings of Fact⁵ are as follows:

³ All dates in the format “2022/23” refer to school years.

⁴ Petitioner’s counsel confirmed at the due process hearing that Petitioner is not seeking compensatory education in the pending case.

Petitioner’s request for compensatory education depends on a determination in evaluations that must be completed in the future, so the compensatory education claim is reserved pending the completion of any evaluations under way and a finding of eligibility for special education and related services.

⁵ Footnotes in these Findings of Fact refer to the sworn testimony of the witness indicated or to an exhibit admitted into evidence. To the extent that the Hearing Officer has declined to base a finding of fact on a witness’s testimony that goes to the heart of the issue(s) under

Hearing Officer Determination

Case No. 2024-0050

1. Background. Student is a resident of the District of Columbia; Petitioner is Student's Parent.⁶ Student is *Age*, *Gender*, and in *Grade* during 2023/24 at *Public School*.⁷ Student is "a hard worker, a kind friend, and an active participant in class."⁸ Student likes Public School and the kids there; Student is very chatty, bubbly and charming.⁹

2. Academics. Student's grades improved through the last three quarters of 2021/22.¹⁰ In reading, Student's teacher reported Student was 3 levels below grade level at the end of 2021/22, which was a "HUGE improvement since the beginning of the year."¹¹ Across the four quarters of 2022/23, Student's English Language Arts ("ELA") grades were steady, while math declined.¹² Student's math teacher's final report card comment was that Student "really struggled academically" in 2022/23.¹³

3. Student's PARCC scores for ELA were at the very low end of Level 1 (did not meet expectations) in 2022/23, better than 26% of students who took the test at Public School.¹⁴ Student's PARCC scores for math were at the very low end of Level 1 (did not meet expectations) in 2022/23, better than 10% of students who took the test at Public School.¹⁵

4. In 2023/24, Student was progressing and showed improvement, but was 3 years below Grade in reading; Student requires a lot of 1:1 support during class assignments.¹⁶ An increase in iReady scores in 2023/24 from Beginning of Year ("BOY") 441 to Middle of Year ("MOY") 458 was viewed as progress and accessing the curriculum.¹⁷ Student's report card was worse in math, with mostly failing to meet standards and an iReady increase from 386 to 406.¹⁸ Student is progressing academically through intervention plans.¹⁹ Student began Public School's Multi-Tiered System Supports ("MTSS") in the fall of

consideration, or has chosen to base a finding of fact on the testimony of one witness when another witness gave contradictory testimony on the same issue, the Hearing Officer has taken such action based on the Hearing Officer's determinations of the credibility and/or lack of credibility of the witness(es) involved.

⁶ Parent.

⁷ Parent; R4.

⁸ P6p54.

⁹ Parent; Special Education Coordinator.

¹⁰ P6p54 (no marks in first quarter).

¹¹ P6p54 (emphasis in original).

¹² P7p60.

¹³ R5p23.

¹⁴ P27p155-56; Special Education Coordinator.

¹⁵ P28p158-59; Special Education Coordinator.

¹⁶ P8p69.

¹⁷ School Psychologist; P9p74.

¹⁸ P9p74,75.

¹⁹ Special Education Coordinator.

Hearing Officer Determination

Case No. 2024-0050

2023/24, which provided goals in reading and math.²⁰ Student's Panorama results in 2023/24 indicated some problems in academics, but no behavioral incidents.²¹

5. Behavior. Behavior is not a concern; Student "often has great behavior, but also often needs many reminders to focus" and use self-control.²² Student has shown improvement in self-control; Student does like to engage in conversation during teaching time.²³ Public School called Parent re Student's behavior, but Student was never suspended or triggered an incident report or other written documents; Student acts up when not doing well; Student wants to be the class clown.²⁴ Student's teachers gave no feedback concerning Student's behavior apart from work avoidance.²⁵ There were no behavior reports about Student in 2022/23 or 2023/24, with no behavioral referrals or suspensions.²⁶

6. Referral for Evaluations. Parent asked for services to help Student in 2022/23 and waited and waited, but nothing happened.²⁷ Parent's formal request for evaluation was made to Public School principal and Special Education Coordinator.²⁸ Parent did not get Public School's attention until she got a lawyer; general education was not sufficient for Student.²⁹ An evaluation request was made for Student by Petitioner's counsel on 11/13/23, with a formal letter dated 11/10/23 seeking a comprehensive psychological evaluation, an FBA, and an occupational therapy assessment, which was sent to the wrong email address for Special Education Coordinator and to the Public School principal.³⁰ Special Education Coordinator explained that an FBA may be needed when a child is violent, aggressive, defiant or seeks to elope, which did not describe Student.³¹ On 3/18/24, Legal Assistant emailed to follow up on a previous evaluation (and records) request for Student.³² Special Education Coordinator asked whether he should reach out to Parent about referral, to which Legal Assistant did not respond.³³

7. DCPS records indicate that a referral of Student for evaluation was made by Parent on 3/29/24 and acknowledged the same day.³⁴ An Analysis of Existing Data ("AED") dated 5/17/24 noted that Student has made marked progress and is approaching standards in both

²⁰ *Id.*

²¹ P25p125-39; P26p141-53; Special Education Coordinator.

²² Special Education Coordinator; P6p54.

²³ P5p52.

²⁴ Parent.

²⁵ Special Education Coordinator.

²⁶ *Id.*

²⁷ Parent.

²⁸ Educational Advocate.

²⁹ Parent.

³⁰ P30-164; P36p194-95.

³¹ Special Education Coordinator.

³² P33p176.

³³ P33p175.

³⁴ R1p1; R2p3.

Hearing Officer Determination

Case No. 2024-0050

reading and math.³⁵ Both reading and math iReady assessments found Student's percentile rank to be 7 or below and at risk for Tier 3 intervention.³⁶ Based on the areas of concern in the AED, the MDT team determined that additional information was needed to determine eligibility for special education, and stated that cognitive and occupational therapy assessments should be completed by 6/10/24.³⁷ Parent consented to psychological and occupational therapy evaluations.³⁸ School Psychologist has begun cognitive and academic assessments and is concerned about Student's absences from school.³⁹ Parent sought technology to use at home with Student and was provided a laptop as an additional device, but has had challenges and is not using it.⁴⁰

8. Education Records. Petitioner's initial request for Student's education records was made by Petitioner's counsel on 10/26/23 to the wrong email address for Special Education Coordinator, to the principal of Public School, and to DCPS's "Sped Record Requests."⁴¹ Sped Record Requests responded within 2 hours explaining that Student was not a special education student, so records needed to be obtained from Public School.⁴² On 1/10/24, Legal Assistant (Petitioner's counsel's new legal assistant) emailed Special Education Coordinator at the wrong email address and Public School principal, asking about documents and stating there had not been "a complete response"; Legal Assistant followed up on 1/22/24.⁴³ Legal Assistant followed up on 2/28/24, including Special Education Coordinator's correct email address for the first time.⁴⁴ Special Education Coordinator responded within minutes, asking for the original request since he wasn't on the previous messages.⁴⁵

9. Special Education Coordinator provided Public School's first set of records to Parent at the end of February 2024, trying to be prompt.⁴⁶ Special Education Coordinator gathered records from various sources and provided all education records available for Student on 3/29/24.⁴⁷ Special Education Coordinator explained that many requested documents are required only for children with disabilities, so were not available; Student has not been found eligible for special education as a child with a disability.⁴⁸ Special Education Coordinator sent Student's disciplinary records, early childhood assessments, report cards,

³⁵ R4p8.

³⁶ R4p9.

³⁷ R4p10,15.

³⁸ Parent.

³⁹ School Psychologist; R6 through R8.

⁴⁰ R4p9; Special Education Coordinator.

⁴¹ P34p187-88; P35p190 (formal letter seeking 15 categories of documents); P37p198.

⁴² P34p187.

⁴³ P34p185-86.

⁴⁴ P34p185.

⁴⁵ P34p184-85; Special Education Coordinator.

⁴⁶ Special Education Coordinator.

⁴⁷ P34p184; Special Education Coordinator.

⁴⁸ Special Education Coordinator.

Hearing Officer Determination

Case No. 2024-0050

and standardized testing from kindergarten to second grade, among other things.⁴⁹ Petitioner received numerous education records about Student which were included in Petitioner's five-day disclosure in this case, including an undated draft AED (P5); report cards for all terms available for 2021/22, 2022/23, and 2023/24 (P6 through P9); numerous attendance records (P10 through P24); and standardized testing and Panorama data (P25 through P28).⁵⁰

10. Special Education Coordinator did everything possible to provide Student's records to Parent and credibly testified that there were no education records of Student available that Public School did not provide to Parent; education records were lost when DCPS changed systems last year from SEDS to Power School.⁵¹ DCPS should keep education records safe, but if a local education agency ("LEA") doesn't have records it can't turn them over to parents.⁵²

Conclusions of Law

Based on the Findings of Fact above, the arguments of counsel, as well as this Hearing Officer's own legal research, the Conclusions of Law are as follows:

The overall purpose of the IDEA is to ensure that "all children with disabilities have available to them a free appropriate public education that emphasizes special education and related services designed to meet their unique needs and prepare them for further education, employment, and independent living." 20 U.S.C. § 1400(d)(1)(A). *See Boose v. Dist. of Columbia*, 786 F.3d 1054, 1056 (D.C. Cir. 2015) (the IDEA "aims to ensure that every child has a meaningful opportunity to benefit from public education").

"The IEP is 'the centerpiece of the statute's education delivery system for disabled children.'" *Andrew F. ex rel. Joseph F. v. Douglas County Sch. Dist. RE-1*, 137 S. Ct. 988, 994, 197 L. Ed. 2d 335 (2017), *quoting Honig v. Doe*, 484 U.S. 305, 311, 108 S. Ct. 592, 98 L.Ed.2d 686 (1988). "The IEP is the means by which special education and related services are 'tailored to the unique needs' of a particular child." *Andrew F.*, 137 S. Ct. at 994, *quoting Bd. of Educ. of Hendrick Hudson Cent. Sch. Dist. v. Rowley*, 458 U.S. 176, 181, 102 S. Ct. 3034, 73 L. Ed. 2d 690 (1982).

Once a child who may need special education services is identified and found eligible, Respondent must devise an IEP, mapping out specific educational goals and requirements in light of the child's disabilities and matching the child with a school capable of fulfilling those needs. *See* 20 U.S.C. §§ 1412(a)(4), 1414(d), 1401(14); *Andrew F.*, 137 S. Ct. at 994; *Sch. Comm. of Town of Burlington, Mass. v. Dep't of Educ. of Mass.*, 471 U.S. 359, 369, 105 S. Ct. 1996, 2002, 85 L. Ed. 2d 385 (1985); *Jenkins v. Squillacote*, 935 F.2d

⁴⁹ Legal Assistant.

⁵⁰ Legal Assistant; P5 through P28.

⁵¹ Special Education Coordinator.

⁵² Educational Advocate.

Hearing Officer Determination

Case No. 2024-0050

303, 304 (D.C. Cir. 1991); *Dist. of Columbia v. Doe*, 611 F.3d 888, 892 n.5 (D.C. Cir. 2010).

The IEP must be “reasonably calculated to enable a child to make progress appropriate in light of the child’s circumstances.” *Endrew F.*, 137 S. Ct. at 1001. The Act’s FAPE requirement is satisfied “by providing personalized instruction with sufficient support services to permit the child to benefit educationally from that instruction.” *Smith v. Dist. of Columbia*, 846 F. Supp. 2d 197, 202 (D.D.C. 2012), *citing Rowley*, 458 U.S. at 203. The IDEA imposes no additional requirement that the services so provided be sufficient to maximize each child’s potential. *Rowley*, 458 U.S. at 198. In its decision, the Supreme Court made very clear that the standard is well above *de minimis*, however, stating that “[w]hen all is said and done, a student offered an educational program providing ‘merely more than *de minimis*’ progress from year to year can hardly be said to have been offered an education at all.” *Endrew F.*, 137 S. Ct. at 1001.

Importantly, the local education agency (“LEA”) must ensure that to the maximum extent appropriate, children with disabilities are educated with children who are nondisabled, and special classes, separate schooling, or other removal of children with disabilities from the regular educational environment occurs only if the nature or severity of the disability is such that education in regular classes with the use of supplementary aids and services cannot be achieved satisfactorily. 34 C.F.R. § 300.114; *Endrew F.*, 137 S. Ct. at 1000 (children with disabilities should receive education in the regular classroom to the extent possible); *Montuori v. Dist. of Columbia*, No. 17-cv-2455 (CKK), 2018 WL 4623572, at *3 (D.D.C. 2018).

A Hearing Officer’s determination of whether a child received a FAPE must be based on substantive grounds. In matters alleging a procedural violation, a Hearing Officer may find that a child did not receive a FAPE only if the procedural inadequacies (i) impeded the child’s right to a FAPE; (ii) significantly impeded the parent’s opportunity to participate in the decision-making process regarding the provision of a FAPE to the parent’s child; or (iii) caused a deprivation of educational benefit. 34 C.F.R. § 300.513(a). In other words, an IDEA claim is viable only if those procedural violations affected the child’s *substantive* rights. *Brown v. Dist. of Columbia*, 179 F. Supp. 3d 15, 25-26 (D.D.C. 2016), *quoting N.S. ex rel. Stein v. Dist. of Columbia*, 709 F. Supp. 2d 57, 67 (D.D.C. 2010).

Petitioner carries the burden of production and persuasion, except on issues of the appropriateness of an IEP or placement on which Respondent has the burden of persuasion, if Petitioner establishes a *prima facie* case. D.C. Code Ann. § 38-2571.03(6); *Z. B. v. Dist. of Columbia*, 888 F.3d 515, 523 (D.C. Cir. 2018) (party seeking relief bears the burden of proof); *Schaffer ex rel. Schaffer v. Weast*, 546 U.S. 49, 62, 126 S. Ct. 528, 537, 163 L. Ed. 2d 387 (2005).

Issue 1: *Whether DCPS denied Student a FAPE by failing to timely and comprehensively evaluate Student for special education services during 2022/23 and/or 2023/24 by conducting (a) a comprehensive psychological evaluation, (b) a functional behavioral assessment, and/or (c) an occupational therapy evaluation pursuant to child-find*

Hearing Officer Determination

Case No. 2024-0050

obligations and/or Parent's written request for evaluations. (Petitioner has the burden of persuasion on this issue.)

Petitioner did not meet her burden of persuasion on whether DCPS should have evaluated Student more quickly and thoroughly based on child-find, including Parent's written request. The D.C. Circuit Court emphasized in *DL v. Dist. of Columbia*, 860 F.3d 713, 717 (D.C. Cir. 2017), that child-find is among the most important IDEA requirements, in order to identify, locate and evaluate every child in need of special education. *See* 34 C.F.R. § 300.111. The child-find obligations of an LEA are triggered either by awareness of the child's circumstances or by parental request. *See Long v. Dist. of Columbia*, 780 F. Supp. 2d 49, 57 (D.D.C. 2011).

Here, DCPS should have been aware of Student's need for a special education evaluation through Student's academic circumstances, even apart from parental request. Student's teacher reported that Student was 3 levels below grade level in reading at the end of 2021/22, while Student's math teacher commented that Student "really struggled" academically in 2022/23. Student's PARCC scores for both ELA and math were at the very low end of Level 1 (did not meet expectations) in 2022/23.

Parent did ask for support to help Student in 2022/23, but nothing happened until Parent obtained counsel and sent a formal request for evaluation to DCPS at least on 11/10/23. Through counsel, Parent sought a comprehensive psychological evaluation, an FBA, and an occupational therapy assessment. An AED was finally conducted on 5/17/24 and the MDT team determined that additional information was needed to determine eligibility for special education. The AED concluded that cognitive and occupational therapy assessments should be conducted by 6/10/24. School Psychologist has begun cognitive and academic assessments which she expects to complete by 6/10/24. At the due process hearing, there was no dispute that the occupational therapy evaluation was under way, but there was significant controversy about whether an FBA needed to be conducted based on Student's behavior.

The conclusion of this Hearing Officer is that Student's behavior was not a concern warranting an FBA, for Student often had "great" behavior and simply needed reminders to focus and use self-control to limit conversation when being taught in class. There were no behavior reports or referrals or suspensions involving Student in 2022/23 or 2023/24, merely calls from Public School about work avoidance or Student needing to focus. Parent noted that Student often sought to be the class clown, while Special Education Coordinator further explained that Student is very chatty and charming and does not exhibit the negative behaviors requiring an FBA. The undersigned concludes that Student's behaviors do not provide a sufficient basis on which to require an FBA to be conducted.

If Student is found eligible for special education and related services based on the assessments that are currently being conducted, Parent will be entitled to seek compensatory education at that point for the failure of DCPS to conduct earlier assessments at least based on the earlier requests of Parent. This is not a question that can be resolved now or which Petitioner is seeking to have resolved in this proceeding.

Hearing Officer Determination

Case No. 2024-0050

Issue 2: *Whether DCPS denied Student a FAPE by failing to allow Parent full access to education records. (Petitioner has the burden of persuasion on this issue.)*

Petitioner failed to meet her burden of persuasion on the issue of access to Student's education records. As a general matter, parents of a child with a disability have the right to examine all education records that pertain to the identification, evaluation, and educational placement of the child, and provision of a FAPE. 20 U.S.C. § 1415(b)(1); 34 C.F.R. § 300.501(a). Student has not been determined to be a child with a disability, but 34 C.F.R. § 300.613(a) provides that parents must be permitted to inspect and review any education records relating to their child that are collected, maintained, or used by an agency. *See also Jalloh ex rel. R.H. v. Dist. of Columbia*, 535 F. Supp. 2d 13, 21 (D.D.C. 2008) ("parents have the right to examine records and [educational agency] must give parents the opportunity to inspect, review, and copy records").

An "education record" under IDEA is defined by the regulations implementing the Family Educational Rights and Privacy Act ("FERPA"). 34 C.F.R. § 300.611(b). Under FERPA, an education record includes records, files, documents, and other materials which "(i) contain information directly related to a student; and (ii) are maintained by an educational agency or institution or by a person acting for such agency or institution." 20 U.S.C. § 1232g(a)(4)(A); 34 C.F.R. Part 99.

Here, Petitioner formally requested Student's education records on 10/26/23, but there were delays caused by Petitioner's counsel sending the request to an incorrect email address for Special Education Coordinator. Special Education Coordinator gathered Student's records from various sources and provided all education records available for Student on 3/29/24, explaining that many of the requested documents are required only for children with disabilities, but Student has not been found to be a child with a disability at this point. Further, Special Education Coordinator explained that some records were lost when DCPS switched from SEDS to Power School last year, credibly concluding that DCPS provided to Parent all education records that were available and could be provided by Public School.

In short, the undersigned agrees with Educational Advocate that DCPS should keep all education records safe, and apparently should have done a better job with Student's education records. But if DCPS doesn't have additional education records for Student it cannot turn them over to Parent, and a further order by the undersigned to produce records would not change that unfortunate reality. Nor was there any suggestion that further searching would be of any use, so is not ordered in these circumstances.

ORDER

Petitioner has not prevailed on either issue in this case. Accordingly, **it is hereby ordered** that, except for the **reservation of rights for compensatory education** discussed

Hearing Officer Determination

Case No. 2024-0050

in Issue 1 above, any and all other claims and requests for relief are **dismissed with prejudice**.

IT IS SO ORDERED.

Dated in Caption

/s/ *Keith Seat*

Keith L. Seat, Esq.
Hearing Officer

NOTICE OF RIGHT TO APPEAL

This is the final administrative decision in this matter. Any party aggrieved by this Hearing Officer Determination may bring a civil action in any state court of competent jurisdiction or in a District Court of the United States without regard to the amount in controversy within ninety (90) days from the date of the Hearing Officer Determination in accordance with 20 U.S.C. § 1415(i).

Copies to:

Counsel of Record (Appendix A, by email)

ODR (hearing.office@dc.gov)