

DAVID N. CICILLINE
Mayor

DONNIE W. EVANS, Ed.D.
Superintendent

Providence
Schools
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PROVIDENCE SCHOOL BOARD

BOARD OF REGENTS FOR
ELEMENTARY AND SECONDARY EDUCATION

OFFICE OF THE
COMMISSIONER

August 16, 2007

Mr. Peter McWalters, Commissioner
Rhode Island Department of Education
255 Westminster Street
Providence, RI 02903

Dear Commissioner McWalters:

On behalf of the Providence School Board, I am submitting this letter as the Providence School Department's formal application for variances to Sections 300.552(B)(1) and 300.136(b) of the RI Board of Regents for Elementary and Secondary Education Regulations Governing the Education of Children with Disabilities. In accordance with the Protocols for Granting Variances to Regulations of the Board of Regents, the Providence School Department has performed the following:

1. Superintendent Evans submitted a letter of application, dated July 12, 2007, to initiate the process for requesting the variances.
2. The School Department scheduled a special meeting for August 14, 2007 and advertised this meeting per the requirements of the Open Meetings law and Protocols for Granting Variances to Regulations of the Board of Regents. A legal notice was placed in the Providence Journal on July 14, 2007.
3. The School Board held the special meeting to discuss the variance request and hear public comment on August 14, 2007.

Please note that in addition to the School Board Hearing required as part of the variance application process, the District held three additional meetings with parents, teachers and the community to ensure appropriate communication and notification regarding the variance and to provide all stakeholders with ample opportunity to voice any questions and/or concerns. Staff met first with the leaders of the Local Advisory Committee for Special Education (LAC) on July 19, 2007, to solicit their comments and feedback before publicizing the meetings. A meeting was then held for the LAC and all parents of special education students on July 25, 2007. The following week we held a community meeting on August 1, 2007, for all parents, staff and community members who wanted to attend and comment before the official hearing. As a result, we have received valuable information from parents and teachers regarding the state of special education in the district as well as feedback regarding the variance request.

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An Equal Opportunity Employer. The Providence School Department does not discriminate on the basis of race, age, sex, religion, sexual orientation, gender identity or expression, national origin, color, disability or veteran status. The district's mission is to enable every student to discover and develop his or her unique talents and to ensure that each student achieves high standards through the provision of a rigorous and challenging common core curriculum, strong parental and public support and engagement in the educational process, and robust recruitment and retention of the highest quality workforce, by providing leadership, professional development, support and inspiration to all employees.

In accordance with the Protocols for Granting Variances to Regulations of the Board of Regents, I am forwarding to you the following documents/materials related to the special meeting held on August 14, 2007: transcript of the meeting, a CD containing video footage of the meeting, audience handouts and the sign-in sheet for all attendees who gave public comment. Per the Protocol, I have also attached all written comments that the School Board and/or staff have received regarding the requests for variances. Last, I have enclosed meeting notes and a copy of another CD containing video footage of the community meeting held on August 1, 2007.

After careful consideration, the Superintendent recommends amending the initial variance requests as follows:

Request for a variance to Section 300.552 (B)(1) of the RI Board of Regents for Elementary and Secondary Education Regulations Governing the Education of Children with Disabilities.

Existing Regulation - Section 300.552 School Age Children.

(1) Self-contained special classes whether part-time or full-time for school aged children with mild and moderate disabilities shall be limited to eight (8) children unless there is an equivalent of a full-time teacher assistant in which case the maximum number allowable shall be ten (10) children. When a work placement program is being conducted at the senior high school level whereby half of the children with disabilities are involved in out-of-school work placement, there shall be a special education teacher in the classroom and at least one (1) other special education teacher employed in the coordination and counseling of work placement activities. When half of the class is on work placement, the maximum size of the class may exceed ten (10) children with disabilities with the equivalent of a full-time teacher assistant, but in no case shall the class size exceed a maximum of twenty (20) children with disabilities. Maximum class size for children with severe, profound or multiple disabilities shall not exceed six (6) children and shall include a full-time teacher assistant when the class size exceeds three (3) children.

Initial Variance Request:

Self-contained special classes whether part-time or full-time for school aged children with mild and moderate disabilities shall be limited to twelve (12) children for elementary school classes and fifteen (15) for secondary school classes with the equivalent of a full-time teacher assistant.

Amended Variance Request:

Self-contained special classes whether part-time or full-time for school aged children with mild and moderate disabilities shall be limited to twelve (12) children for elementary school classes and secondary school classes with the equivalent of a full-time teacher assistant.

Request for a variance to Section 300.136(b) of the RI Board of Regents for Elementary and Secondary Education Regulations Governing the Education of Children with Disabilities.

Existing Regulation - 300.136 (b) Personnel.

Special Education Director. Every school district must employ a full-time special education director, provided however, school districts may join with a neighboring school district in appointing a full-time special education director to conduct a regional special education program. A school district having more than ten thousand (10,000) students enrolled in the public and non-

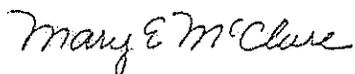
public schools, and children in the age range of three (3) through five (5) years old in the school district shall also employ a full-time assistant special education director for every two-thousand (2,000) students enrolled in excess of ten thousand (10,000) students. A regional program which consists of more than two (2) communities shall also employ a full-time assistant special education director. If the total enrollment in the regionalized communities is over twelve thousand (12,000) students, an additional assistant special education director shall be employed for every two thousand (2,000) enrolled students above twelve thousand (12,000) students.

Variance Request:

A school district having more than twelve thousand (12,000) students enrolled in the public and non-public schools, and children in the age range of three (3) through five (5) years old in the school district shall also employ a full-time assistant special education director for every four-thousand (4,000) students enrolled in excess of twelve thousand (12,000) students. The intent of this variance request is not to reduce the number of Special Education Supervisors, rather it is to modify their roles to better support all students and reduce incidences of students entering special education. There will be no reductions in force of the Special Education Supervisors, except through attrition.

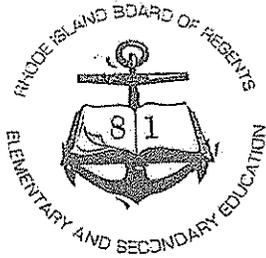
Thank you in advance for your consideration of this matter. Please do not hesitate to contact me should you have any questions or concerns regarding this matter.

Sincerely,



Mary E. McClure
President

C: Providence School Board Members
Mayor David N. Cicilline
Providence City Council
Superintendent Donnie Evans
Mr. David Abbott, Deputy Commissioner
Mr. Kenneth Swanson, Director of Special Populations
Ms. Mary-Beth Fafard, Ph.D., Special Assistant of Urban Affairs



State of Rhode Island and Providence Plantations
DEPARTMENT OF EDUCATION
Shepard Building
255 Westminster Street
Providence, Rhode Island 02903-3400

Peter McWalters
Commissioner

August 24, 2007

Mary E. McClure
President
Providence School Board
797 Westminster Street
Providence, RI 02903-4045

Dear Ms. McClure:

I am in receipt of your request for a variance to Sections 300.552(B)(1) and 300.136(b) of the Rhode Island Board of Regents for Elementary and Secondary Education Regulations Governing the Education of Children with Disabilities. I am also in receipt of the materials that you and the district have provided in support of this request. First, allow me to commend the district for adherence to an open process in moving the variance through the school board and providing opportunities for public input. Second, I commend the district for soliciting the input from parents and teachers, ensuring that parents had access to the proceedings through interpreters, videotaping the proceedings, and providing documentation of all meetings and hearings. The process utilized by your district serves as a good example for other school districts in seeking public input on important educational matters.

I also want to recognize and thank the parents of children enrolled in the Providence schools and the Providence Local Special Education Advisory Council (LAC) for their input to this process and their efforts to communicate with families throughout the proceedings. In addition, I want to recognize and thank the teachers and administrators and their respective organizations for joining the proceedings. A decision on this variance request would have been even more difficult without the valuable input of the community affected by this decision.

Under my guidance, RIDE staff members from the Offices of Progressive Support and Intervention, Legal Affairs, and Special Populations were charged with reviewing all of the material provided and formulating recommendations for my consideration. This review involved reading all transcripts from the school board meeting on August 14, 2007, transcripts and notes from other public forums, letters from concerned constituents, attendance sheets, and related materials submitted as evidence.

In addition to the evidence presented by the district, RIDE used other materials that have been part of our ongoing work with Providence in addressing compliance with state and federal law and the requirements of the No Child Left Behind Act. These materials included the Providence Strategic Plan, the Providence District Corrective Action Plan, the recent special education School Support System Report, the District Plan to Reduce the Removal of Students with Disabilities from the Regular Classroom, and the Providence Facilities Plan.

Specific references from this information were important in my consideration of this variance request. Of particular note were the findings of the School Support System visit, December 2006, which documented the creation of a Special Education Task Force to be convened by Superintendent Evans to oversee needed improvements in the special education services in Providence. Also of note were improvements in the district's compliance with special education regulations, improved professional development, and the revision and enhancement of district special education procedures. All of these documents provided clear evidence of positive developments in Providence's efforts to improve teaching and learning within the district in the face of extreme financial exigency.

From the evidence and testimony, I am in complete agreement with the school board, Superintendent Evans, and the community that the special education system in Providence is in immediate need of attention. I fully understand that you collectively face difficult decisions regarding the need for substantive changes in the manner in which the district provides special education services. There is no action that I can take in regard to your request for a variance that will immediately address all the educational challenges facing the Providence special education program. However, I am convinced of your heartfelt desire to make difficult choices that may break from the status quo but are designed to result in positive change without diminishing the level of service to any child within your school system. Any action I take is framed by our mutual obligation to ensure that every child with a disability receives a free and appropriate public education, as is required by state and federal law.

The testimony from the community was compelling and, based on issues raised in the hearing and the community meeting, I requested additional information from Superintendent Evans before rendering a decision. This information included:

- Descriptions of the proposed duties of the special education administrators that would support the ability of the district to effectively increase self-contained classes to twelve (12) students and ensure compliance with state and federal special education regulations;
- Clarification of the number and type (including the nature of the disability of the students) in the self-contained classrooms affected by the variance; and,
- The number of emergency certified and fully certified special education teachers providing instruction in the self-contained classrooms affected by the requested variance.

Based on the review of the evidence and the compelling testimony of the community, I applaud the district's decision to reduce its request for the variance from fifteen (15) students to one teacher with one teacher assistant ratio in self-contained classrooms to a ratio of twelve (12) students to one teacher, with one teacher assistant at all levels in self-contained classrooms. This proposed move from ten students to twelve, coupled with one teacher assistant is well within research-based projections of the minimum adult involvement needed to provide a free and appropriate public education "FAPE" to this student population. I furthermore appreciate the detailed information the district has submitted regarding the proposed changes to modify the roles of several of your assistant special education directors. The modification to your variance request, as well as your submission of additional information, was vital to my decision in this matter.

As you may know, I have a statutory obligation "[t]o implement broad policy as it pertains to the goals and objectives established by the Board of Regents; to enforce standards and to exercise general supervision over public elementary and secondary education in the state..." along with my responsibility "...for the administration of policies, rules, and regulations of the Board of Regents with relation to the entire field of elementary and secondary education within the state

not specifically granted to any other department, board, or agency and not incompatible with applicable law. (R.I.G.L. §16-60-6 (4) and R.I.G.L. §16-60-6).

I do not take these responsibilities lightly. However, it is my more compelling obligation to ensure that every district in Rhode Island is able to meet the educational needs of each public school student.

The Providence Public School District (PPSD) is a district identified as in need of corrective action, and we are working together closely to effect the changes necessary to meet the annual measurable objectives dictated by federal law. In a hypothetical case of unlimited resources, this mandate would involve no difficult choices. However, the long history of low student achievement, coupled with a recent pattern of diminishing resources, requires informed balancing among priorities and a series of difficult decisions.

Pursuant to state law, I am obligated to provide "progressive levels of control by the department of elementary and secondary education over the school and/or district budget, program, and/or personnel" in cases where the district is in need of corrective action. (R.I.G.L. §16-7.1-5). This statute provides me with authority over a district's operations sufficient to ensure that the goals of progressive support and intervention are met. These goals include the provision of a free and appropriate public education to all students in need of special education. (R.I.G.L. §16-24-1, et seq. and 20 U.S.C. §1400, et seq.).

After careful consideration of the impact on educational offerings by either granting or denying your request, I am hereby exercising my authority under § 16-7.1-5 of the Rhode Island General Laws to authorize the PPSD to move from the current regulatory requirement of ten (10) students to one teacher with one teacher assistant to a ratio of twelve (12) students to one teacher with one teacher assistant throughout the elementary and secondary levels for the 2007-2008 school year. It is my firm belief that this change in staffing patterns is necessary for the district to achieve its goals of continuing to improve its educational offerings for all students in light of diminished resources. However, this authorization is specifically limited to the district's continuous adherence to the following conditions:

1. Monitoring System for Instruction and Compliance

There is a need for PPSD to have an effective system of monitoring for both instruction and compliance. To ensure that monitoring is improved in 2007-2008, PPSD will do the following: (1) provide RIDE with an interim report from the Superintendent of Schools that students affected by this authorization continue to receive FAPE (October 15, 2007), and (2) develop a system for monitoring the instructional delivery, student achievement and compliance with regulations governing students with disabilities in those classrooms affected by this authorization. Said plan will include specific measures for showing progress in the implementation of the staffing changes provided for herein, reporting structures to the community and RIDE, the strategies and actions that will be employed if progress is not being made, and how the district-wide assistance teams, inclusive of administrators of special education, will be responsible for implementing the monitoring plan. The development of the plan will be a collaborative effort among PPSD and RIDE personnel. (December 1, 2007)

[Evidence compelling this action: Testimony from August 14, hearing and LAC correspondence of July 19, 2007; School Support System Report, District Strategic Plan, District Corrective Action Plan].

2. Improving Parent Support & Communication:

There is a need for PPSD to strengthen parent supports and communication. While the District's Corrective Action Plan has identified activities for increasing parent and community engagement in 2007-2008, PPSD will do the following immediately: (1) dedicate a full time equivalent to the Family Engagement Center, and (2) work with the LAC to develop strategies for increasing communication with parents, particularly those affected by the variance. PPSD will provide RIDE with a report on these actions by the opening of the school year.

[Evidence compelling this action: Testimony from the August 14, 2007 hearing – see pages 93, 94 and 103, District Corrective Action Plan, Correspondence from parents and LAC July 17, 2007]

3. Roles, Duties, and Deployment of Special Education Supervisors

There is an immediate need for PPSD to define the roles, duties, and deployment of special education supervisors under the reorganization for special education delivery in 2007-2008. While PPSD articulated some of the duties in its August 17, 2007 correspondence, the district will provide RIDE with a complete description of the duties, responsibilities, and locations of special education supervisions by October 1, 2007.

[Evidence compelling this action: Testimony from the August 14, 2007 hearing, District Corrective Action Plan, Correspondence from parents and administrators, District correspondence of August 17, 2007]

4. Training and supports provided to special educators, special education teacher assistants, principals and critical central office personnel affected by the variance.

There is a need for PPSD to ensure that ongoing training and supports are provided to educational staff at all levels. While the District's Strategic Plan and Corrective Action Plan include professional development for staff, PPSD will provide RIDE with comprehensive descriptions of the specific professional development training and supports that will be provided to: (1) special educators, teacher assistants, and principals to increase their capacity to deliver instruction designed to meet IEP goals of students in classrooms affected by the allowances granted herein; (2) supervisors/administrators of special education to provide improved implementation of school based instructional delivery; and (3) critical central office personnel (e.g. Executive Directors of Elementary, Middle and High Schools) for increasing their capacity to support the implementation of the monitoring system for instruction and compliance. (October 1, 2007)

[Evidence Compelling this Action: Testimony from the hearing and correspondence from teachers, administrators; District Strategic Plan, District Corrective Action Plan]

5. Physical Space:

There is an immediate need for PPSD to have physical space that is conducive to instruction and the needs of students with disabilities. Given that PPSD has a facilities plan, PPSD will provide RIDE with an analysis of the physical space of the self-contained classrooms housing students affected by the variance and demonstrate the sufficiency for effective instructional delivery and meeting the goals of the IEP's. (October 1, 2007).

[Evidence compelling this action: Testimony from the public hearing on August 14, 2007 from all stakeholder groups; District Facilities Plan, District correspondence of August 17, 2007]

6. High Qualified Teachers and Qualified Teacher Assistants:

There is a need for PPSD to demonstrate that it is providing highly qualified teachers to deliver effective instruction to students with disabilities. Given the District's Strategic Plan and Corrective Action Plan, PPSD will provide RIDE a complete list of teachers and teacher assistants assigned to the self contained classrooms affected by the variance and verifying that they are highly qualified. (October 1, 2007)

[Evidence compelling this action: Educator quality and credentials were a highlighted concern in the correspondence received by the Superintendent from the Local Advisory Council dated July 19, 2007; District Strategic Plan]

7. Instructional Grouping by Similar Strengths and Needs

Instructional groupings for students with disabilities require improvement. As PPSD implements the variance within schools, every attempt must be made to create instructional groupings of students based on their strengths and needs rather than seat availability. Effective immediately, the implementation of this practice will inform the District's Corrective Action, School Support System Report and LRE plans for effective research based practice addressing student achievement. PPSD will provide RIDE with a report on these actions by the opening of the school year.

[Evidence compelling this action: Pervasive theme of dissatisfaction with grouping students simply because they carry mild/moderate label. Pg. 26 of testimony. School Support System Report pg. 20 finding 2, LRE plan]

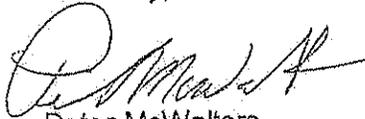
8. Implementation of the Least Restrictive Environment Plan, the Disproportionality Plan and the School Support System Support Plan.

PPSD has submitted to RIDE the above-cited three plans of action and received Commissioner Approval. By granting the authorization set forth herein, it is expected that there will be no diminished effort in implementing the components of these plans. PPSD will provide periodic updates regarding progress of the implementation of these plans at either the monthly joint RIDE/PPSD capacity team meetings or quarterly face-to-face meetings. PPSD must also adhere to timelines already established within these plans.

In regard to the requested variance to Section 300.136(b) of the Rhode Island Board of Regents for Elementary and Secondary Education Regulations Governing the Education of Children with Disabilities for special education administrators, I have determined that there is no demonstrated need to grant a variance or other form of relief at this time. It appears that the district intends to assign personnel to locations and/or roles that will improve the coordination and delivery of special education and related services. It is well within the district's current authority to do so without further action from this department, and there is therefore no need to take any explicit action in regard to this second request for a variance from regulation. However, RIDE will monitor these proposed assignments closely to ensure that resultant activities remain within the allowances provided under applicable federal law.

In closing, I again thank you for your efforts to facilitate a transparent process in requesting this variance. I have been impressed with the access the public had to the process and proceedings. All offices within RIDE are prepared to assist you and your staff in the implementation of your efforts and I look forward to continued improvements in the special education services in the Providence Public Schools. I also look forward to reviewing the materials to be supplied as you fulfill the conditions set forth within this letter of authorization. Please accept my best wishes for continued success in improving educational opportunities and outcomes for all Providence schoolchildren.

Sincerely,



Peter McWalters
Commissioner

cc: Mayor David N. Cicilline
Robert Flanders, Chairman, Board of Regents
Members of the Providence City Council
Donnie W. Evans, Superintendent
David V. Abbott, Deputy Commissioner/General Counsel
Mary Canole, Director of Progressive Support and Intervention
Kenneth Swanson, Director of Special Populations
Mary-Beth Fafard, PSI, Higher Education Fellow

STATE OF RHODE ISLAND

BOARD OF REGENTS FOR
ELEMENTARY & SECONDARY
EDUCATION

Providence Teachers' Union, et. al. :
 v. :
 Commissioner of Elementary and Secondary :
 Education, et al :
 :
 :
 Appeal of the Grant of a Variance to The Providence :
 School Board to Section 300.552 (B) (1) of the :
 Regulations Governing the Education of Children :
 With Disabilities :

ORIGINAL

DECISION

This is an appeal by the Providence Teachers' Union, and two parents of students in the Providence schools, from the August 24, 2007 decision of the Commissioner to grant a variance to Section 300.552 (B) (1) of the Board of Regents for elementary and Secondary Education Regulations Governing the Education of Children with Disabilities.¹

The request for a variance was initiated by the July 14, 2007 letter of the Providence superintendent of schools, Donnie W. Evans, to the Commissioner. Subsequent to a public hearing on the matter by the Providence School Board (PSB), held on August 14, 2007, the PSB submitted its formal application for variances to Sections 300.552 (B) (1) and 300.136 (b). In response, the Commissioner determined that there was no demonstrated need to grant a variance or other form of relief to Section 300.136 (b).² It is the Commissioner's grant of the variance to Section 300.552 (B) (1), which deals with class sizes, that is the subject of this appeal. The Appeals Committee has held two special meetings in order to give the appellants and others a meaningful opportunity to be heard on the issues presented.

The Providence Public School District is a district identified as failing and in need of corrective action and the Commissioner took his action under the progressive support and intervention authority of RIGL Section 16-7.1-5. That statute places a duty on the Commissioner to undertake progressive levels of control over "the school and/or district budget, program, and/or personnel" of failing schools in order to improve their performance. The Commissioner contends that his authority under Section 16-7.1-5 is not diminished by the provisions of RIGL 16-2-21.4 (The so called Carullo Act) which prohibits the "waiver" of regulations for special education adopted under the provisions of RIGL 16-24-2. He points out that he granted a "variance" to the regulation not a "waiver" of it. The crucial difference being that a variance requires an alternative method of achieving compliance with the underlying regulation rather than waiving compliance with it. In his decision the commissioner specifically limits the variance to the Providence School District's continuous adherence to the eight conditions that are set out in detail therein.

¹ A copy of the Commissioner's decision is appended as "Appendix A"

² At page 4 of the commissioner's decision.

He contends that his actions were in full compliance with applicable federal and state laws and with the "Protocol for Granting Variances to Regulations" adopted by this board on May 27, 1993.

The appellants brought an action in Superior Court³ seeking to prevent the variance from remaining in effect. The court heard the matter on September 28, 2007 and issued a decision on October 1, 2007 in which judge Rubine found that the appellants had not exhausted the administrative remedies available to them pursuant to RIGL 16-39-3, which provides for appellate review of Commissioner's decisions by this board. The court also dealt with the appellants' argument that the grant of the variance was simply a device to circumvent the prohibitions of the Carullo Act and save money for the district. At page 13 of his decision judge Rubine states:

In particular, the Board will have to determine whether the action of the Commissioner in approving the requested variance and establishing the additional conditions contained in his letter of August 24, 2007, are indeed tied to the academic failures and achievement roles which purport to form the basis of his authority to act; or, whether, instead, the Commissioner's actions were motivated by merely a funding inadequacy which -- a funding inadequacy which the increase in class size was designed to correct. If the Regents, after hearing from all interested parties, including these plaintiffs, believe the Commissioner's actions are not materially related to increasing performance, then this Court would expect the Regents to reject the variance as merely a so-called end-run around the Carullo Act requirements, which the Commissioner himself has stated do not permit waivers for variances. If, on the other hand, the Regents determine that the Commissioner's granting of the variance is indeed materially related to increasing performance in the area of providing services to special education students in Providence and underperforming districts, then the Regents could find the Commissioner acted properly within his broad authority under 16-7.1-5.

It is certainly true that virtually all reallocation of educational resources, including class sizes and the training and assignment of personnel have a monetary effect. However, it is also true that changes in resource allocation that improve the educational effort are desirable and indeed necessary if we wish to improve the quality of the education provided to students in the underperforming districts - whether that sometimes costs more or less. Based on our review of the arguments, briefs and other materials submitted by the parties, we conclude that the eight conditions imposed on the district place the variance in the desirable and necessary category. While monetary issues may have been the motivation for the Providence School District's request, the Commissioner's response to it was, in our opinion, motivated by the need to fulfill his obligation to improve performance in the district in a manner not constrained by dogged adherence to an arbitrary number for class size.

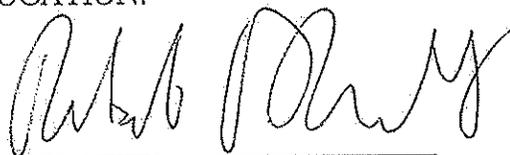
³ C.A. No. PC 2007-4710, Providence Teachers' Union, et. al. v. Donnie Evans, et. al.

We would note that the Special Education Regulations were amended on December 19, 2007 to, among other things, remove the mandated class size numbers. They now provide that class size maximums for self contained classrooms and case load ratios will be determined based on the needs of students within a district. The Department of Education will continue to give guidance and to monitor the district plans and results, and, as an additional safeguard, the Commissioner will have authority to intervene when necessary. It might be argued that this case is therefore moot but we have decided to proceed on it because of the possible consequences to the district programs and personnel if the status of the changes brought about by the variance were left in doubt. Our opinion and that of the Court should also be useful to the educational community when any issues regarding regulation variances might arise.

For the reasons stated herein, the decision of the Commissioner to grant the subject variance is affirmed.

RHODE ISLAND BOARD OF REGENTS
FOR ELEMENTARY & SECONDARY
EDUCATION.

1/9/08, 2008



Robert G. Flanders, Jr., Chairman

The above is the decision recommended by the Appeals Committee after due consideration of memoranda filed on behalf of the parties and arguments made at the hearings of the appeal on November 7, 2007 and January 3, 2008.

Amy Berretta (s.v.)
Amy Berretta
Appeals Committee Chairperson

ORIGINAL