

VIRGINIA: DEPARTMENT OF EDUCATION

SPECIAL EDUCATION DUE PROCESS HEARING



[REDACTED]

v.

DECISION

[REDACTED] Public Schools

I. INTRODUCTION

The Due Process Hearing was requested by the parents, [REDACTED] and [REDACTED] on [REDACTED]. [REDACTED] The hearing was continued several times over the next year as the parties and their counsel attempted to resolve some of the issues. At the time the Due Process Hearing was initiated [REDACTED] was not attending school. [REDACTED] parents were continuing to educate [REDACTED] at home using the CARD/LOVAAS Program which will be further explained below. The parties reached a compromise placement and [REDACTED] began attending [REDACTED] School in [REDACTED] on [REDACTED]. Neither the parents nor the LEA were satisfied that the compromise IEP and placement were appropriate and discussions between the parties continued through the remainder of the [REDACTED] school year. A due process hearing was scheduled to begin on [REDACTED]. After some testimony, the parties believed they could reach an agreement for services to be provided in the [REDACTED] to [REDACTED] school year. The hearing was adjourned early on [REDACTED] to allow the parties additional time to work out that settlement. On [REDACTED] the hearing resumed and we read into the record the following agreement: [REDACTED] PS will modify [REDACTED] IEP for the [REDACTED] to [REDACTED] school year to provide the following:

1. One half day [REDACTED] to include thirty minutes of discrete trial training (DTT) which may be increased up to one hour at the parents request and upon notice to the LEA.
2. One half day of special education, to include one hour of DTT techniques.
3. [REDACTED] will be assigned to [REDACTED] School.
4. [REDACTED] PS will continue consultation with [REDACTED], the amount of time to be agreed upon by the parties.
5. The IEP may be reviewed upon request of the parents. The parents agree to sign the current IEP (school exhibit #100) with these revisions.

With the above agreement the hearing resumed, the sole remaining issue being whether the parents are entitled to reimbursement for their in-home program for the time period [REDACTED] through [REDACTED].

Testimony was taken on [REDACTED], [REDACTED], [REDACTED], and [REDACTED]. Following conclusion of the testimony counsel for both parties submitted written argument and copies of the cases cited in their briefs. The issue to be determined by this Hearing Officer is whether the parents are entitled to reimbursement for their home-based ABA (applied behavior analysis) program because the [REDACTED] offered by [REDACTED] PS was not appropriate.

II. STATEMENT OF FACTS

1. [REDACTED] was born on [REDACTED] in [REDACTED] Virginia, and moved to [REDACTED] when [REDACTED] was [REDACTED] old. [REDACTED] was diagnosed as developmentally delayed at age 2 year, 4 months. (PE 1, 2). Additional testing was recommended by the Child Development Clinic at the [REDACTED], [REDACTED] to "rule out autism" (PE 3).

2. Although a psychological evaluation at [REDACTED] dated [REDACTED] concluded that results of the Childhood Autistic Rating Scale (CARS) fell in the non-autistic range (SE 2), a school assessment dated [REDACTED] found that [REDACTED] was "functioning within the severely autistic rate". (PE 5).

3. The [REDACTED] school found that [REDACTED] was eligible for special education under the category "autism" on [REDACTED] (PE 6).

4. There are no other documents in the record from [REDACTED]. However, [REDACTED] testified that [REDACTED] participated in development of an IEP for [REDACTED] in [REDACTED] and that a developmentally delayed classroom with speech services was offered. [REDACTED] declined the services feeling they were inadequate. (Tr 262 to 266).

4. [REDACTED] received military orders to return to [REDACTED] Virginia. [REDACTED] initiated a referral for [REDACTED] to the [REDACTED] Public Schools. [REDACTED] had a meeting with school personnel on [REDACTED] (PE 8). [REDACTED] could not remember where or with whom [REDACTED] met but indicated that [REDACTED] did provide copies of all evaluations done for [REDACTED] in [REDACTED] (Tr 55 to 58).

5. [REDACTED] remained in [REDACTED] with the children to sell the house (Tr 133). The initial referral to [REDACTED] PS was terminated on [REDACTED] because "eligibility could not be determined due to parent unable to keep scheduled appointments". (SE 5)

6. While still in [REDACTED] [REDACTED] attended [REDACTED] first workshop for ABA on [REDACTED] (Tr. 132). [REDACTED] attended the first follow-up workshop with [REDACTED] on [REDACTED] indicating at that time that [REDACTED] was attending school one and one-half days per week and that [REDACTED] was getting services from the (

but discontinued their ABA services. (PE 9)

7. The ABA in-home therapy is based on the research of Dr. Ivan Lovaas, a psychologist at the University of California. It involves 30 to 40 hours per week of intensive one-on-one discrete trials using prompts and rewards for the correct response. (PE 74). The original study by Dr. Lovaas reported in 1987 that of 19 children in the original program, nine "recovered" meaning they were able to function successfully in a regular classroom after about two years of intensive home instruction. (Tr. 785 - 786).

8. [REDACTED] continued the CARD workshops after moving to [REDACTED] Virginia in early [REDACTED] (PE 10). [REDACTED] also gave permission to [REDACTED] PS to evaluate [REDACTED] for special education services. (SE 6).

9. The same day that [REDACTED] gave written permission to evaluate - [REDACTED] the [REDACTED] PS conducted a [REDACTED] developmental assessment (SB 9, PE 11) and a psychological assessment (SB 7, PE 12). [REDACTED] was [REDACTED] years [REDACTED] months; on the BSID - II [REDACTED] earned a developmental age score of [REDACTED] and on the CARS [REDACTED] earned a score in the moderately to severely autistic range of functioning. Both expressive and receptive language were significantly delayed when compared with [REDACTED] chronological age. (SB 8, PE 13).

10. [REDACTED] told the [REDACTED] assessment center that [REDACTED] had been involved in intense ABA therapy for almost a year and although [REDACTED] had made significant progress [REDACTED] continued to display significant delays. (SE 7)

11. A social history was completed by [REDACTED], MSW, through home visits on [REDACTED] and [REDACTED] [REDACTED] completed the Vineland Social - Emotional Early Childhood (SEEC) Scales and found that [REDACTED]'s adaptive level of personal and social sufficiency was "low". [REDACTED]

[redacted] noted in [redacted] report that "[redacted] is extremely pleased with the progress that [redacted] has made with LOVAAS, and is hopeful that this program can be incorporated with [redacted]'s pre-school experience should [redacted] qualify for a special education program". (SE 10, PE 15).

12. An eligibility meeting was held on [redacted], [redacted]. The minutes of this meeting noted the low score on the social emotional assessment, the significant delays in cognitive ability on the BSID - II and the results of the CARS, showing many characteristics consistent with a diagnosis of autism or PDD (Pervasive Developmental Delay). Developmental testing noted significant delays in all three areas and speech language testing noted significant delay in receptive and expressive language skills. Based on these assessments the committee recommended special education as [redacted]. [redacted] signed the minutes noting [redacted] agreement with this recommendation. (SE 12, SE 16).

13. [redacted] PS has a policy against labelling [redacted] children with a specific disability and prefers to characterize [redacted] children as [redacted]. (Tr. 134). The label would not affect the IEP goals and objectives (Tr. 335)

14. IEP meetings were held on [redacted], and [redacted], [redacted] (SE 14, 15). Goals and objectives were developed, with additional objectives added and one deleted at [redacted]'s request. [redacted] indicated at the initial meeting that [redacted] did not agree with the testing results from the [redacted] assessment. [redacted] PS proposed placement in a [redacted] classroom at [redacted] five days a week for 180 minutes per day, speech language therapy two days per week for twenty minutes each and two hours per month of the home based ABA program. Exposure to non-disabled peers would have been available through the YMCA [redacted] year old program (Tr. 339). [redacted] rejected this IEP; [redacted] indicated that [redacted] wanted one on one instruction (no

group instruction). (SE 14). [REDACTED] felt strongly that [REDACTED] needed to continue [REDACTED] one to one home based program; that a classroom of eight or nine students to one teacher and one assistant was not appropriate. (Tr. 138 to 139).

15. [REDACTED] felt after the IEP meeting on [REDACTED], [REDACTED] that [REDACTED] was forced to either accept or reject the IEP offered by [REDACTED] Schools. They would not provide the one on one ABA home program, stating it was the school's prerogative to determine the type of teaching method to be used for the child. (Tr. 144 to 146).

16. Another IEP meeting was held on [REDACTED] [REDACTED] and [REDACTED] PS then proposed a placement in a [REDACTED] [REDACTED] autistic classroom. (SE 16). A [REDACTED] class would allow a lower student/ teacher ratio (Tr. 310). The special education and related services proposed by the LEA remained the same. [REDACTED] again refused to give [REDACTED] consent. (SE 16)

17. [REDACTED] provides services to approximately 400 autistic students throughout the [REDACTED] area and to about 100 autistic students in [REDACTED] (Tr. 584).

18. A question was raised at the [REDACTED] meeting regarding occupational therapy services. LEA personnel indicated that the parent must first give permission to evaluate for occupational therapy since this was a new related service. [REDACTED] signed the permission to evaluate on [REDACTED] (PE 21)

19. IEP meetings were held on [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] and [REDACTED]. (SE 18, 20, 21, 23, 24, 25, 26, 27; PE 34, 25, 37, 39). [REDACTED] PS changed [REDACTED] identification from [REDACTED] to autistic. Occupational Therapy (OT) was added to the IEP as a related service. Goals and objectives were reviewed, updated and revised. The LEA offered a full day [REDACTED] class five days per week at [REDACTED] School, with related

services of speech, OT and home visits for two (2) hours/month. Parents declined to sign either accepting or rejecting the IEP. [REDACTED] expressed the following concerns: (1) no data to indicate that [REDACTED] was effective; (2) [REDACTED] home is the preferred placement; (3) appropriateness of models and [REDACTED] setting. (SE 26 27, PE 39).

20. During this time period [REDACTED] coordinator for [REDACTED] observed [REDACTED] in [REDACTED] home program on [REDACTED] and subsequently via video camera at [REDACTED] [REDACTED] (Tr. 608). [REDACTED], the speech/language pathologist observed [REDACTED] in [REDACTED] home program on [REDACTED] (PE 33). These school professionals concluded that [REDACTED] could benefit from special education in a [REDACTED] classroom with additional speech services, because [REDACTED] needed to develop better communication skills. (SE 22).

21. On [REDACTED] [REDACTED] agreed to place [REDACTED] in the public school classroom indicating "I have serious reservations about placing my child in your program". At this time [REDACTED] was [REDACTED] and [REDACTED] years old. [REDACTED] attributed [REDACTED] knowledge of the alphabet, numbers 1 to 15, ability to speak in four or five word sentences, follow simple directions and activities of daily living (potty training, washing hands, brushing teeth, dressing, eating and drinking) to [REDACTED] ABA therapy. [REDACTED] acknowledged that [REDACTED] autism was most obvious in [REDACTED] lack of social skills, lack of age appropriate language and self - stimulatory behaviors. (PE 40).

22. [REDACTED] was enrolled at [REDACTED] School on [REDACTED] and [REDACTED] attended until [REDACTED] (SE 29) [REDACTED] testified that [REDACTED] was in the [REDACTED] program for three half days and seven full days. [REDACTED] had a difficult transition and challenging behaviors (Tr. 622-623). [REDACTED] requested a meeting to modify [REDACTED] current IEP and notified the team at that meeting that [REDACTED] intended to remove [REDACTED] from the [REDACTED] program.

(PE 46, Tr. 181). Based on observations of [REDACTED] during that two week period by [REDACTED] parents, their expert consultant, [REDACTED] and another parent of a [REDACTED] student - [REDACTED] - [REDACTED] [REDACTED] disapproved the current IEP (PE 48) and withdrew [REDACTED] from [REDACTED] (PE 49).

23. [REDACTED] observed [REDACTED] classroom on [REDACTED] [REDACTED] provided written feedback at the parents' request by letter dated [REDACTED] [REDACTED] report indicated that [REDACTED] instructional time with the special education teacher and the speech therapist were appropriate and "generally on the right track". [REDACTED] presence in the classroom on that day was deemed an important and helpful support to the other [REDACTED] staff. [REDACTED] did observe inconsistencies among staff in their responses to [REDACTED] behavior and [REDACTED] was most concerned with limited qualifications of classroom assistants. Finally, [REDACTED] noted that the classroom [REDACTED] observed offered no opportunity for [REDACTED] to interact with normal functioning peers. [REDACTED] concluded that [REDACTED] and [REDACTED] made an appropriate decision to remove [REDACTED] from the [REDACTED] classroom and continue [REDACTED] home based program. (PE 50)

24. Parents witness [REDACTED] testified that [REDACTED] observed [REDACTED] in the [REDACTED] classroom and [REDACTED] "screamed a lot", engaged in self-stimulatory behaviors and was confined in a Rifton chair along with all of the other children, except [REDACTED] (Tr. 72 to 74). None of the other witnesses, including the parents, observed [REDACTED] in a Rifton chair and school witnesses testified that this type of restraint could not be used without parental permission and was not used with [REDACTED] (Tr. 626, 922, 961).

25. [REDACTED] wrote to [REDACTED] on [REDACTED] requesting that the IEP be revised to provide: half day regular classroom with a full time aide; speech/language and occupational therapy on a daily basis; reimbursement for [REDACTED] home ABA therapy from [REDACTED]

and continuing into the future. (PE 50)

26. Another IEP meeting was held on [REDACTED] and parents requested a half day classroom setting with a teacher assistant and constant interaction with normal peers. The IEP team reiterated its previous recommendation for a full day special education classroom through [REDACTED] two home visits per month, occupational therapy and speech/language therapy. The parents disapproved this IEP. The school system proposed observing [REDACTED] in [REDACTED] private school and home setting. [REDACTED] did not wish to approve any additional observations or assessments. (PE 52)

27. An IEP meeting was held on [REDACTED] and [REDACTED] PS offered a combined [REDACTED] program with a one to one aide. [REDACTED] testified that [REDACTED] PS adopted this recommendation "because of [REDACTED]'s insistence that this would be best for [REDACTED] and our willingness to try" (Tr. 631). The IEP was written to begin on [REDACTED] [REDACTED] did not sign consenting or disapproving the IEP. (PE 54)

28. [REDACTED] explained in a subsequent letter dated [REDACTED] that [REDACTED] understood after [REDACTED] that the proposed plan would not begin until the following [REDACTED] allowing sufficient time for the hiring and training of [REDACTED] assistant. [REDACTED] stated in that letter "I accept the one half day [REDACTED] placement to start on [REDACTED]. In line with practices in other jurisdictions, I will hire an assistant/classroom aide of my choosing, to be reimbursed by the [REDACTED] PS. The [REDACTED] PS will have absolute veto power over the hiring and firing of that individual". (PE 55). This letter continued to reject the [REDACTED] portion of the IEP, requested increased time for speech and OT services and renewed the parents request for reimbursement for their home based ABA program. (id)

29. [REDACTED] PS responded to [REDACTED]'s letter, denying [REDACTED] request for reimbursement and [REDACTED] offer to hire [REDACTED]'s assistant. [REDACTED] states in this correspondence the "school division continues to believe that we can provide [REDACTED] a free appropriate public education". The parents were again notified of their procedural rights and advised to contact [REDACTED] or [REDACTED] to schedule another IEP meeting to discuss [REDACTED]'s request for a half day [REDACTED] program. [REDACTED] notes that the parents had neither approved nor disapproved the [REDACTED] IEP. (PE 56)

30. On [REDACTED] the parents requested a due process hearing. (PE 57, SE 34)

31. In late [REDACTED] and [REDACTED] the parents and [REDACTED] PS reached a compromise which allowed [REDACTED] to attend a regular one half day [REDACTED] at [REDACTED] School with the assistance of a full time teacher assistant. Speech and occupational therapy times were increased and a behavioral contingency plan was added to the IEP. (PE 58, 60, SE 35, 36). Thereafter, parents suggested additional modifications to the IEP and by the start of school on [REDACTED] there were still disagreements (PE 60, 61, 62). [REDACTED] finally began school at [REDACTED] in the half day regular [REDACTED] on [REDACTED] (PE 64). The LEA continued to offer and recommend a placement at [REDACTED] which included a [REDACTED] class for three hours and fifteen minutes per day, half day [REDACTED] three weekly sessions of speech language therapy, one weekly session of OT and extended school year services. (Tr. 360).

32. An IEP meeting was held on [REDACTED] for the following reasons: (1) to address OT Services; (2) to propose implementation of academic objectives in a special education class or to delete academic objectives; (3) to discuss increased time in public school. The school again proposed a one half day [REDACTED] class which the [REDACTED] rejected and then proposed a reduction in

academic objectives if [REDACTED] did not allow the [REDACTED] placement. (SE 74). [REDACTED] wanted all of [REDACTED] IEP objectives implemented in the [REDACTED] class. [REDACTED] PS believed that all of the objectives could not be addressed in a one half day regular [REDACTED] classroom and wanted to increase [REDACTED] time in the public school. (PE 65, 66).

33. On [REDACTED] an IEP meeting was held and [REDACTED] time in OT and speech therapy was increased. [REDACTED] wanted all related services to be provided outside the [REDACTED] classroom. [REDACTED] school day was increased but [REDACTED] was still attending from 9:00 to 11:15 a.m. (SE 77)

34. It took [REDACTED] approximately one month to adjust to the [REDACTED] class at [REDACTED] School. (Tr. 462 to 463, 564 to 566, 708).

35. [REDACTED] continued for the remainder of the [REDACTED] school year in a regular [REDACTED] for a half day at [REDACTED] with a full time aide and [REDACTED] home ABA program for the remainder of the day.

36. [REDACTED] has made good progress in the regular [REDACTED] program at [REDACTED] School in the areas of socialization and communication (Tr. 486). According to school witnesses, however, [REDACTED] did not make appropriate academic progress nor could [REDACTED] learn specific skills or generalization without professional special education services. (Tr. 716 to 718).

37. Additional IEP meetings were held on [REDACTED], [REDACTED], [REDACTED], [REDACTED], [REDACTED]. [REDACTED] PS continued to want [REDACTED] in school for a full day, at least half of that in special education. The parents rejected the school proposal and advocated for incorporation of their home based ABA curriculum.

38. The number of children identified with autism has significantly increased in recent years

(Tr. 989). The predominant approach by public schools to educating children with autism uses a behavioral model. Discrete trials are one end of the behavioral continuum, being very structured, formal and teacher or parent initiated (Tr. 993). Many other programs or models are also being used successfully and have research to support their efficacy. Some of these approaches are: TEACCH developed at the University of North Carolina (emphasizing parental involvement and cooperation between home and classroom), LEAP developed by Phillip Strain at the University of Pittsburgh (emphasizing group learning with normal peers), incidental teaching, pivotal response training (Tr. 993-997). There is considerable controversy in the field regarding the preferred method of teaching autistic children. Discrete trial therapy is one approach that has research support but it is not the only approach (Tr. 998).

III. CONCLUSIONS OF LAW

I believe that at this initial administrative hearing [REDACTED] PS bears the burden of proving that its proffered IEPs were appropriate for [REDACTED] by demonstrating that the goals and objectives, specific special education and related services were reasonably calculated to afford educational benefit. "[T]he basic obligation to provide a disabled child with a free appropriate public education rests with the school district. It is an affirmative duty imposed by statute." Board of Ed. of the County of Kanawha v. Michael M., 95 F. Supp. 600, 32 IDELR 170, 535 (SD W.Va. 2000) Court cases cited by [REDACTED] PS to place the burden of proof on parents were seeking to overturn administrative decisions. The local education authority has a threshold responsibility under IDEA (formerly EAHCA) to 1) comply with all procedural safeguards and 2) develop an individualized education plan that is reasonably calculated to enable the child to receive educational benefit. Board

of Ed. v. Rowley, 458 US 176, 207 (1982).

There is no claim in this case of procedural deficiencies. Rather, the number of IEP meetings and volume of draft documents is staggering. I find that school personnel listened to the parents concerns and genuinely tried to incorporate parental suggestions into the numerous IEPs drafted over the three year period covered by this hearing.

The underlying dispute in this case, as in many recent IDEA cases involving autistic children, is whether "ABA/ LOVAAS/Discrete Trial Teaching is the sole program that is research based and consistently successful with children with autism" (Plaintiff's Rebuttal Brief). I do not find that the Parents' evidence mandates that conclusion. Both experts, [REDACTED] and [REDACTED] acknowledged there is disagreement among educators over preferred methodology. The [REDACTED] Program is designed to educate children with autism. None of the instructional techniques used by [REDACTED] were experimental, offbeat or "goofy" to use [REDACTED] term. Rather, they were considered best practice by school personnel, all of whom had impressive professional credentials. [REDACTED] also incorporated discrete trial techniques. [REDACTED] the [REDACTED] coordinator, testified that [REDACTED] and other staff were trained in various methodologies, including TEACCH, EDEN 2, PECS, SCERTS and LOVAAS. The Parents want me to find that their home-based ABA/Lovaas program was the only appropriate placement for [REDACTED] from [REDACTED] to [REDACTED]. The evidence does not support that finding. The successive IEP's offered by [REDACTED] PS were appropriate.

[REDACTED] was [REDACTED] years [REDACTED] months when first evaluated by [REDACTED] PS. The school proposed a one-half day [REDACTED] class, with related services. That placement was rejected by parents and the School offered a half-day [REDACTED] class, which was also rejected. The following year [REDACTED] was older and the LEA offered a full day [REDACTED] class, still

including speech/language and home services and adding occupational therapy. When [REDACTED] was almost [REDACTED] spent 10 days in a [REDACTED] class and was withdrawn by [REDACTED] parents before a successful transition. At the end of the [REDACTED] school year [REDACTED] PS offered a combined [REDACTED]/regular [REDACTED] with a one-on-one aide, largely in an effort to accommodate the parents' concerns. (*Cf. T. H. v. Board of Ed. of Palatine Community Consolidated School District*, 30 IDELR 764 (N.D. Ill. 1999), cited by Parents, where autistic student was assigned to cross-categorical classroom without assistance of individual aide.) By the time [REDACTED] actually entered the public school in [REDACTED] in a regular half day [REDACTED] at [REDACTED], [REDACTED] had been receiving the ABA/LOVAAS home therapy for three [REDACTED] years. Yet [REDACTED] continues to need a full time personal assistant and has significant communication and social deficits.

The [REDACTED] Public Schools are able to educate [REDACTED] appropriately within their public school curriculum. School personnel designated programs which were specifically tailored to meet the individual needs of this autistic student. The parents had the right to educate their child at home using the LOVAAS/CARD program; however, the local education authority is not liable for that expense. *Bales v. Clark*, 523 F. Supp. 1366, 1370 (E.D. Va. 1981). "Where a school system proposes an appropriate educational program, parents are not entitled to reimbursement simply because they are advocates of some competing educational theory. This Court should not force the school system to adopt one of several competing educational methodologies." *Alexander K. v. Va. Board of Ed.*, 30 IDELR 967, 969 (E.D. Va. 1999).

In this case the School Board has not presented merely conclusory opinions that its proffered IEP's were adequate. Numerous witnesses with professional credentials testified with specificity about the goals and methodology of their programs. They gave examples demonstrating how

[REDACTED] ABA program was deficient: [REDACTED] did not comprehend the short sentences [REDACTED] read; [REDACTED] could not generalize the content of home trials to [REDACTED] school environment; [REDACTED] was not learning socialization skills. [REDACTED] certainly has made progress over time in [REDACTED] home program. However, LEA witnesses testified that [REDACTED] progress would have been greater in a special education classroom. [REDACTED] PS was willing to incorporate DDT techniques in its curriculum and included a home component in the IEPs.

The School District has met its burden of proving that the IEPs were appropriate. Therefore, the Hearing Officer's inquiry is finished. It does not matter whether the parents' home-based Lovaas program is also appropriate or helpful, because [REDACTED] PS has met its obligation under the law. Board of Ed. v. Michael M., 32 IDELR at 533. Consequently, parents are not entitled to reimbursement.

This Decision is final unless appealed to the Virginia Department of Education within thirty (30) administrative working days.

The School Division shall submit an implementation plan to the parties, the Hearing Officer and the State Department of Education within forty-five (45) calendar days.

DATE: [REDACTED]

[REDACTED]
[REDACTED] - Hearing Officer
[REDACTED], P. C.
[REDACTED]
[REDACTED]
[REDACTED]

CERTIFICATE OF MAILING

I hereby certify that on this [REDACTED] day of [REDACTED], I mailed a true copy of the foregoing Decision to [REDACTED] Virginia Department of Education, Post Office Box 2120, Richmond, Virginia 23218; [REDACTED] [REDACTED] Counsel for Parents; and [REDACTED] [REDACTED] [REDACTED] [REDACTED], Counsel for [REDACTED] Public Schools.

[REDACTED]
[REDACTED]