



# AMADOR COUNTY UNIFIED SCHOOL DISTRICT

Superintendent, Amy L. Slavensky, Ph.D.

217 Rex Avenue, Jackson, CA 95642 | (209) 257-5353 | Fax (209) 257-5360 | [www.amadorcoe.org](http://www.amadorcoe.org)

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April 6, 2020

**Sent via email to:**

Ms. Kristin Wright, Director of Special Education, California Department of Education  
Dr. Robert Steve Russell, Superintendent, Amador County Office of Education

RE: Email from Dr. Russell, April 2, 2020, 1:04 PM

Dear Ms. Wright and Dr. Russell,

The purpose of this communication is to provide a response to Dr. Russell's email message (below). It is my understanding that at about the same time on April 2, 2020, he sent similar messages to the ACUSD/ACOE/SELPA Board of Trustees, the ACUSD Superintendent's Cabinet, and the presidents and other labor leaders of the Amador County Teachers' Association (ACTA) associated with ACUSD and the Special Educators of Amador County (SEAC) associated with ACOE. It is also my understanding that he made a similar announcement in person to the ACUSD/ACOE Human Resources staff in the office on the same day and has been interacting on Facebook regarding this matter. To date, Dr. Russell has not discussed this matter with me.

Please note, prior to beginning the Special Education Study Team/Transfer Committee planning and collaborative processes over one year ago and throughout the process, my Cabinet Team and I studied the pertinent Education Code sections and the ACOE SELPA Plan to ensure our understanding about related statutes and requirements. We also consulted legal counsel before and throughout the process. Dr. Russell was invited to and participated in many of the planning sessions with the Cabinet Team and the external facilitators who helped us with the process. Dr. Russell and I were also active members of the Special Education Study Team/ Transfer Committee.

Of key importance, if the transfer is not implemented, the fiscal consequences to ACOE and ACUSD will be severe. See statements 1-8 in the Additional Related Information that follows.

To be clear, the process to study and consider transfer of the SELPA, AU and program included 12 months of planning and collaborating with 25-30 key stakeholders who represent all facets of our learning community including parents and ACTA, SEAC and CSEA labor leaders. The process also relied on recommendations and guidance from experts in the field including the California Department of Education, the Fiscal Crisis and Management Assistance Team (FCMAT), School Services of California, a CDE approved technical assistance provider, and two external facilitators.



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The following quotes are from Dr. Russell as stated in the attached email, followed by my responses.

*Dr. Russell: "I have cancelled plans to move the AU, SELPA and the Mild to Moderate program from the ACOE to the ACUSD."*

Response: Respectfully, you do not have the authority to do so. The authority rests with the SELPA Board of Trustees. The ACUSD Board of Trustees has the right to "take back" program and AU that rightfully belongs with the district of record, accountable for all students including all students with disabilities. On February 12, 2020, both the ACUSD Board and the SELPA Board unanimously approved the transfer of the AU, SELPA and mild-moderate program and all related employees, including the entire Transportation Department.

*Dr. Russell: "Ed Code does not allow for a single district with less than 30,000 students to be a stand alone SELPA which is why we are classified as a "district-county" SELPA so therefore the SELPA and the AU will remain with the ACOE."*

Response: The transfer plan, acknowledged and supported in the November 14, 2019 letter from CDE, does not include a stand alone SELPA with one LEA, but rather both LEAs, ACUSD and ACOE, as it currently does and as required by EC 56211. The SELPA Local Plan clearly delineates that the ACOE SELPA is designated as a necessary small SELPA. (Refer to Maureen Burness' attached analysis of related Special Education statute for additional information.) Therefore, the assertion that the SELPA and AU may not transfer to ACUSD is not valid.

*Dr. Russell: "Additionally, complaints were filed in the County Office by ACTA and SEAC regarding the SELPA plan not being followed in the transfer process. The complaints stated the SELPA Board recognized the importance of the dates in the transfer section of the plan as evidenced by their meeting on November 20, 2019 to revise the date for employee notification and then ignored the new date and recommended the transfer anyway. I spoke with Kristin Wright regarding this issue and she is going to reach out to you later today."*

Response: I have no knowledge of these alleged complaints, nor were they submitted to me or my office at any time; therefore, I have not been presented with a legal timeline or due process opportunity by which to respond. Any concerns by ACTA related to District positions in the 2020-2021 school year are properly within the scope of bargaining between the District and ACTA. The District has invited and stands ready and waiting to bargain with ACTA any potential effects of adding the new positions/programs.

Response: Both CSEA units #239 for ACUSD and #827 for ACOE have enthusiastically signed a legally binding agreement for transfer of their related employees effective 7/1/2020, which was subsequently approved by the ACUSD Board on 2/26/2020. Board agenda:

<https://amadorcoe.org/wp-content/uploads/ACUSD-Agenda-and-Minutes-2-26-20.pdf>



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*Dr. Russell: “By Ed Code, the SELPA Board should have petitioned the County Office for permission to amend the SELPA plan. If a negative decision was given, the SELPA Board could then appeal to the County Superintendent. If the County Superintendent agreed with the negative decision, then the SELPA Board could appeal to the CDE. None of this process has taken place.”*

Response: I believe you are citing EC 56140 which is related to multi-district county offices of education (COE) where COEs have authority for approving/disapproving the districts’ Local Control Accountability Plan (LCAP), Annual Adopted Budget, and the SELPA Local Plan. As per EC 52070(e), the State Superintendent is responsible for approving/disapproving these governance policy documents for single district COEs as the district and county governing boards consist of the same elected officials.

Response: There is no need or requirement for the SELPA Board to petition the County Office as the SELPA Board is the approving authority and it authorized and directed the transfer on 2/12/2020. See the links below for the related Board materials.

Response: 22 of 24 ACOE mild-moderate credentialed teachers and 3 of 3 ACOE certificated school nurses have signed legally binding transfer documents wherein they have already resigned their employment with the County Superintendent and will begin employment with the District on or before 11/1/2020, which is more than one full year following the transfer notification to CDE.

Response: In the event CDE were to determine that the County Superintendent in a single school district county with a singular set of individuals serving as three Boards of Trustees has the authority to approve/disapprove a SELPA Local Plan, despite knowing that EC 52070(e) provides for the State Superintendent to fill this role for single school district counties with respect to the LCAP and it has always been the practice for the State Superintendent to also fill this role for the Local Plan, I would then appeal to CDE. In this case, Dr. Russell, is your email of April 2, 2020 your disapproval with explanatory comments? If so, I will expeditiously exercise my right to appeal up to the State Superintendent.

### Additional Related Information:

1. FCMAT conducted two studies for ACUSD and ACOE: a Multiyear Financial Projection Study (April 29, 2019) and a mandatory Fiscal Health Risk Analysis (October 31, 2019). This was due to not meeting the state required reserve fund levels as reported in the ACOE and ACUSD September 2018 Unaudited Actuals Reports, and due to two negative and two qualified interim budget certifications for ACOE from November 2018 to November 2019, and due to four qualified budget certifications for ACUSD during the same time period.



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- a. FCMAT Multiyear Financial Report: [https://amadorcoe.org/wp-content/uploads/FCMAT-Report\\_Multiyear-Projection.pdf](https://amadorcoe.org/wp-content/uploads/FCMAT-Report_Multiyear-Projection.pdf)
  - b. FCMAT Fiscal Health Risk Analysis Report (ACUSD): <https://amadorcoe.org/wp-content/uploads/ACUSD-Fiscal-Health-Risk-Analysis-10-31-19.pdf>
  - c. FCMAT Fiscal Health Risk Analysis Report (ACOE): <https://amadorcoe.org/wp-content/uploads/ACOE-Fiscal-Health-Risk-Analysis-10-31-19.pdf>
  - d. ACUSD Response to the FHRA: <https://amadorcoe.org/wp-content/uploads/FCMAT-Fiscal-Health-Risk-Analysis-ACUSD-Response-11-6-19.pdf>
  - e. ACUSD Cost Savings Plan Submitted to CDE on 3/15/2019: <https://amadorcoe.org/wp-content/uploads/ACUSD-Cost-Savings-Plan-Submitted-to-CDE-3.15.19-1.pdf>
  - f. Additional Financial Reports including Interim Budget Reports: <https://amadorcoe.org/departments/business/financial-reports/>
2. The FCMAT Multiyear Financial Report referenced above recommended: “Consider arranging for a special education study to evaluate potential savings and/or restructuring of service delivery models.”
  3. Linda Protine, CDE Appointed Fiscal Expert/Advisor, provided extensive guidance and support including a recommendation to study transfer of the AU and SELPA in order to minimize duplication of effort, increase efficiencies, and mitigate the double expensing of over \$6 million for special education services.
  4. School Services of California conducted an organizational study of ACUSD/ACOE dated March 3, 2017, which states: “Improved efficiency and oversight would occur with a program transfer to the District, as all employees and supervisors would be under the auspices of the District and accountability would be consistent for all programs, regular and special education, throughout the District.”
  5. Soon after I arrived to serve as the ACUSD Superintendent in October 2016, I became aware that a potential transfer of the SELPA, AU and special education services for our 600+ ACUSD students with disabilities (and approximately 150 ACOE students with disabilities) was a critical consideration, and have been working methodically and carefully ever since to implement many of the system-wide recommendations made by FCMAT and School Services. We have made very good progress.
  6. Following significant reductions and the implementation of other cost savings strategies, it was determined that a study of a potential transfer of the AU, special education program, and the SELPA was the best remaining method to attain and ultimately



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maintain the current positive budget certification as per the 2<sup>nd</sup> Interim Budget Reports accepted by the ACOE and ACUSD Boards on March 11, 2020.

7. For ACOE, another remaining solution would be the lay-off of many certificated and classified employees resulting in the strong likelihood that ACOE would not meet its maintenance of effort (MOE) state requirement. The final solution would be to remain status quo (i.e., not make a transfer). This would require a resubmission of the current fiscal year's 2<sup>nd</sup> Interim Budget Reports (allowable?) as the multi-year financial projections contained therein, and the associated positive certifications, rely on the projected impact of the Board approved transfer in the two out years.
8. The impact of economic uncertainties, prior to and since the onset of the COVID-19 pandemic, on California public school funding is very concerning for Amador County Public Schools. It is incumbent on ACUSD and ACOE to make every effort to maintain the current positive budget status and further strengthen its fiscal condition. The transfer is essential in this effort.
9. On 8/6/2019, Dr. Slavensky and Dr. Russell sent a joint letter dated 8/5/2019 to CDE's Director of Special Education Kristin Wright notifying CDE of the intent to explore the possibility of transferring program, the SELPA and the AU from ACOE to ACUSD effective 7/1/2020. On 8/14/2019, I received confirmation from Kristin Wright who inquired about our timeline. On 8/14/2019, I replied with additional information.
10. On 10/3/2019, I reached out to Kristin Wright again with an update about our progress and requested a reply. On 11/13/2019, Kristin Wright replied with notice that CDE accepted our one-year notification for 7/1/2020, and sent an acknowledgement letter to that effect on 11/14/2020.
11. The Special Education Study Team/Transfer Committee was approved by the Board of Trustees on 9/11/2019 and consisted of labor leaders from all four labor groups, special education and general education teachers, a DIS provider, special education paraprofessionals, CAC/parents, principals, a program specialist/psychologist, district and county office leaders, Dr. Russell, Dr. Slavensky, and two Board members. Board agenda: <https://amadorcoe.org/wp-content/uploads/ACUSD-Agenda-and-Minutes-9-11-19-1.pdf>
12. The Special Education Study Team/Transfer Committee met in five full-day sessions from November 2019 through January 2020 and two afternoon sessions with support from two external facilitators, and reached consensus on the transfer recommendation to the Board of Trustees.
13. The team's recommendation was presented by members of the Special Education Study Team/Transfer Committee to the ACUSD Board and the SELPA Board on 2/12/2020.



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- a. Board packet/materials: <https://amadorcoe.org/wp-content/uploads/ACUSD-Agenda-and-Minutes-2-12-20.pdf>.
  - b. Board minutes: <https://amadorcoe.org/wp-content/uploads/ACUSD-Agenda-and-Minutes-2-26-20.pdf>
  - c. Board audio recording: <https://amadorcoe.org/wp-content/uploads/ACUSD-Recording-2-12-20.mp3>
14. On the morning of 2/13/2020, Dr. Slavensky sent a detailed email communication to Kristin Wright informing CDE of the Board action.
  15. The joint press release from Dr. Russell and Dr. Slavensky dated 2/22/2020 is evidence of Dr. Russell's public support and active involvement in this process:  
<https://amadorcoe.org/joint-press-release-from-aco-e-acusd/>
  16. Labor leaders from the two certificated labor groups, ACTA and SEAC, voluntarily spent two full days away from their classrooms on February 19, 2020 and March 9, 2020 collaborating to merge their collective bargaining agreements into one. This is evidence of their support and full engagement in this transfer process.
  17. Four related job descriptions are on the 4/8/2020 ACUSD Board of Trustees agenda for approval. Pending Board approval, related vacancies will be posted and filled as ACUSD positions for the 2020-21 school year. Board agenda: <https://amadorcoe.org/wp-content/uploads/ACUSD-Agenda-and-Minutes-4-8-20.pdf>

I respectfully request a teleconference with you in the very near future to discuss this matter. I look forward to hearing from you.

Sincerely,

*Amy L. Slavensky*

Amy L. Slavensky, Ph.D.

ACUSD Superintendent of Schools

- C:
- Lisa Constancio, CDE Deputy Superintendent of Public Instruction
  - Elizabeth Dearstynne, Director, CDE School Fiscal Services Division
  - Christine Davis, Administrator, CDE Financial Accountability and Information Services
  - Linda Protine, CDE Fiscal Expert/Advisor Appointed to ACUSD/ACOE
  - Maureen Burness, CDE Special Education Technical Assistance Provider/Consultant
  - Susan Ross, President, ACUSD/ACOE/SELPA Board of Trustees
  - Kandi Thompson, Clerk, ACUSD/ACOE/SELPA Board of Trustees
  - Jared Critchfield, ACUSD/ACOE Assistant Superintendent, Business Services

Attachment: Guidance from Dr. Maureen Burness, Special Education Consultant and CDE Special Education Technical Assistance Provider

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## MAUREEN O'LEARY BURNES, SPECIAL EDUCATION CONSULTATION

916-698-6371  
[moburness@gmail.com](mailto:moburness@gmail.com)

1038 55th Street  
Sacramento, CA  
95819

April 3, 2020

To: Amy Slavensky, Superintendent, ACUSD  
Re: Response to Question submitted for Technical Assistance

You have presented me with the following to answer:

“Given the following statements of fact, what are the implications of the trailer bill language from the 2020-21 Governor’s Budget and related Special Education Reforms, and what are the implications or any concerns related to California Education Code, the ACOE SELPA Local Plan, and any other related statute?:

On February 12, 2020, in a regularly scheduled ACUSD Board of Trustees meeting, the Board unanimously took action to direct and authorize the District to plan and support the negotiations process with labor leaders for the transfer of the Special Education Local Plan Area (SELPA), the Administrative Unit (AU), the Transportation Department, and all classified and administrative staff related to the mild-moderate Special Education services and program from the ACOE to the ACUSD, effective July 1, 2020.

Further, the Board unanimously took action to direct and authorize the District to plan and support the negotiations process with labor leaders for the transfer of all mild-moderate credentialed teachers from the ACOE to the ACUSD effective October 31, 2020. Both motions include oversight and support by a representative steering committee. The CAC will be actively involved as well.

Further, the Board took action in a 4-1 vote to authorize a study team to explore and study the transfer of moderate-severe credentialed teachers and DIS providers from ACOE to ACUSD, effective July 1, 2021.

Following the ACUSD Board of Trustees meeting, the Amador County Public Schools SELPA Board met and unanimously took action to approve the first two aforementioned motions.”

RESPONSE RE: TRAILER BILL LANGUAGE:

The clear intent of the beginning section of the Governor’s 2019 Trailer Bill language is the significant statewide issue of accountability and improved outcomes for students with disabilities, something special education administrators in the state have been tasked with improving. Having had the opportunity to participate in your Special Education Study Team/Transfer Committee stakeholder groups, I have seen an emphasis on the District embracing

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its responsibility for accountability in “One System” that will include special education as part of the larger general education system.

Specific to the question of impact on the progress envisioned by your stakeholder group, you can see in Section 2 that a significant limitation to any potential negative implication is the language that begins with “Commencing with the 2020-2021 fiscal year...” Your District’s and County’s work began a year ago, so the Trailer Bill language would not impact your ongoing work. (In fact, the Governor just announced today that his budget will be significantly different than proposed in January due to the coronavirus pandemic.)

It is also clear that Section 2 language has as its intent a disallowance for any single districts in multiple-district SELPAs to “pull out” and create their own separate SELPA, apart from the remaining districts (in your case, that would be the ACOE). This is not your district’s intent as the SELPA will still consist of the two member LEAs, ACOE and ACUSD. Instead, you are following through with (b) which is “In conjunction with one or more districts...” For purposes of the new to-be-proposed Local Plan submission regarding Governance, the only change is the change in AU. Many member districts are the AU for their SELPA.

As I observed and participated in the stakeholder process, I noted that fiscal solvency was one of the key items of clarity for both the Board of Trustees and the stakeholder group in that it would be better for both LEAs if the District was the AU. Currently, as explained by the CBO in the Stakeholders’ meetings, there is the dilemma of annually expensing over \$6 million two times, once when ACUSD sends the funds to ACOE and again when ACOE spends the funds to pay salaries and benefits for the many employees who exclusively provide all direct services and support for all students with disabilities in ACUSD and ACOE.

Related to any concern associated with the transfer of the AU, it became obvious to me during these meetings, that there is a fiscal necessity to transfer the AU in order to address the above and the matter of having qualified budgets. It was reported to me that fiscal concerns of both ACOE and ACUSD resulted in CDE’s recent monitoring and assignment of a fiscal advisor/expert who had “stay and rescind” authority over ACOE for a period of time, and that this was due to two negative interim budget certifications for ACOE (November 2018, March 2019) followed by two qualified interim budget certifications for ACOE (June 2019, November 2019). There were four qualified interim budget certifications for ACUSD (November 2018, March 2019, June 2019, November 2019).

It was also reported to me that, in FCMAT’s Fiscal Health Risk Analysis (FHRA), it recommended significant reductions and the implementation of other cost savings strategies, and that it was determined that transfer of the AU, special education program, and the SELPA was the best remaining method to address the

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fiscal crisis. This would allow the district and COE to maintain the current positive budget certification status as indicated in the 2<sup>nd</sup> Interim Budget Reports accepted by the ACOE and ACUSD Boards on March 11, 2020. Perhaps the only other remaining potential solution would be the lay-off of many certificated and classified employees resulting in the strong likelihood that ACOE would not meet its maintenance of effort (MOE) state requirement.

The transfer of the AU would greatly minimize this dilemma and significantly reduce the required reserve fund amount, freeing up funds for other necessary purposes including maintaining the state required reserve levels, compensating employees, unexpected legal costs associated with special education, and providing other resources.

The remainder of the Trailer Bill language is for the future and mostly about funding, and will not have any impact or effect on the process for a change in AU.

#### RESPONSE RE: EDUCATION CODE:

EC 56207, regarding program transfers and any disagreement requiring an alternative dispute resolution as defined in the Local Plan, states “The date on which the (program) transfer will take effect may be no earlier than the first day of the second fiscal year beginning after the date on which the sending or receiving agency has informed the other agency and the governing body or individual identified in subparagraph (A) of paragraph (12) of subdivision (a) of Section 56205, unless the governing body or individual identified in subparagraph (A) of paragraph (12) of subdivision (a) of Section 56205 unanimously approves the transfer taking effect on the first day of the first fiscal year following that date.”

In this case the SELPA Board unanimously approved the transfer on February 12, 2020, allowing the transfer to take effect on July 1, 2020. Moreover, the letter from CDE to Dr. Slavensky, dated November 14, 2019, acknowledges notification and states, “... the SELPA members may continue to pursue the new AU designation to be effective July 1, 2020.”

The CDE letter further states, “the Amador County SELPA, pursuant to EC 56211 et seq., which requires that a SELPA under this designation (i.e., a small and sparse population) adhere to the governance structure requirements of EC 56195.1 (c),” meaning that the County Office of Education remain a participating member of the SELPA. It is my understanding that this has been and continues to be the plan, to be stated in the new Local Plan. There should be no other change or concerns related to the “necessary small SELPA” considerations.

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Another area of possible concern regarding a draft of a new Local Plan is related to EC 56140 which states, county offices shall “Within 45 days, approve or disapprove any proposed local plan submitted by a district or group of districts within the county or counties ... If disapproved, the county office shall return the plan with comments and recommendations to the district. The district may immediately appeal to the (State) Superintendent to overrule the county office’s disapproval ... A local plan shall not be implemented without approval of the plan by the county office or a decision by the (State) Superintendent to overrule the disapproval of the county office.”

EC 56140 is related to multi-district county offices of education (COE) where COEs have authority for approving/disapproving the districts’ Local Control Accountability Plan (LCAP), Annual Adopted Budget, and the SELPA Local Plan. As per EC 52070(e), the State Superintendent is responsible for approving/disapproving governance policy documents and providing oversight for statewide systems of support for single district COEs, as these district and county governing boards consist of the same elected officials. While EC 52070(e) is specific to the LCAP, it was reported to me that the intent and past practice, in the case of Amador County Public Schools, is that this statute relates to the Local Plan as well.

#### RESPONSE RE: THE EXISTING LOCAL PLAN

The ACOE SELPA Local Plan was updated February 18, 2020 where in this SELPA is designated as a “Necessary small SELPA” (different from Size and Scope criteria). The Plan states, “The Board shall ... exercise authority over ... and review and approve revisions...” This reinforces the fact that, in this case, the approving entity is the Board and not the county or district superintendent.

The section on Program Transfer Policy notes that the plan is as per EC 56207 and related timelines. It states, “...a request filed (e.g., a request made in September, 2017, if approved, would take effect on July 1, 2018), provided that the request is approved by a unanimous vote of the SELPA Governing Board.” In this case, the request or notification was made on August 5, 2019 for an effective date of July 1, 2020 for classified employees, the SELPA and the AU, and an effective date of November 1, 2020 for certificated employees. Both timelines are within the Local Plan language.

The Plan states, “Requests to transfer a program ... will be denied if submitted untimely unless, in the sole discretion and judgment of the Program Transfer Committee, extraordinary circumstances on a case-by-case basis warrant consideration of an untimely submission.” The Public Safety Power Shutoff Events in October 2019 forced ACUSD and ACOE to close all schools for six (6)

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school days. The Special Education Study Team/Transfer Committee had been scheduled to meet from 9:00 AM to 3:30 PM on two of those closure days. This constitutes an extraordinary circumstance which caused working dates to be rescheduled and the process extended into January and February 2020.

The Plan states: “The proposed receiving LEA shall submit a letter to the sending LEA and the SELPA Administrative Unit.” This was a joint effort with the letter submitted to CDE signed by both the ACUSD and ACOE Superintendents. The intent was collaborative and the understanding was that this met the stated requirement.

If I may be of further assistance to you, please do not hesitate to contact me.

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