Practices and Challenges in Online Instruction for Students with Disabilities:
School Superintendent Forum Proceedings Series (Report No. 4)

IDEA Principles in the Online Environment: IEP and Eligibility

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Online learning currently reaches millions of K-12 learners and its annual growth has been exponential. Industry has projected that this growth will likely continue and has the potential to lead to dramatic changes in the educational landscape. While online learning appears to hold great promise, civil rights legislation, related policies, and their application in online learning as they pertain to students with disabilities has received much less research attention than is necessary for policy planning and decision making. Researchers urgently need to develop shared understandings about how online learning affects students with disabilities as they participate in online learning environments, move through their coursework, and transition back to the brick-and-mortar classrooms (or out of school settings in general). Research that claims to focus on students with disabilities in online learning environments should be designed and carried out with particular attention to educational and social outcomes. The Center on Online Learning and Students with Disabilities (COLSD) conducts research in alignment with these goals.

COLSD, a cooperative agreement among the University of Kansas, the Center for Applied Special Technologies (CAST), and the National Association of State Directors of Special Education (NASDSE), is focused on four main goals:

1. To identify and verify trends and issues related to the participation of students with disabilities in K-12 online learning in a range of forms and contexts, such as full or part time, fully online schools; blended or hybrid instruction consisting of both traditional and online instruction, and single online courses;
2. To identify and describe major potential positive outcomes and barriers to participation in online learning for students with disabilities;
3. To identify and develop promising approaches for increasing the accessibility and positive learning outcomes of online learning for students with disabilities; and
4. To test the feasibility, usability, and potential effectiveness of as many of these approaches as would be practical.

To meet the first two goals, COLSD has conducted a number of activities designed to develop understandings about the general status of students with disabilities in online learning. Exploratory research activities included case studies of two fully online schools; several national surveys of purposefully sampled parents, students, teachers, and district and state administrators; interviews with members of individualized education program (IEP) teams

working with students with disabilities who were completing online coursework; and a systematic review of one state's student participation, retention, and completion data. COLSD is making an additional effort to describe the landscape of online learning for students with disabilities through a series of forums with different stakeholder groups. The first forum was held with state directors of special education (or a designee) to obtain an in-depth view of the issues and concerns with students with disabilities in online learning from the state policy perspective. The second forum was conducted with virtual school district superintendents and other top-level district administrators. The responses obtained from these administrators are the topic of this paper.

Participants and forum topics

In the summer of 2014, COLSD staff began planning a series of forums to shed light on the state of online learning and students with disabilities from the perspective of various practitioners and stakeholders. This second forum was held with virtual school superintendents and other virtual school administrators in a face-to-face gathering March 31 and April 1, 2015. Due to their configuration as online schools, some of these institutions enroll students across the country. These administrators were selected for participation on the basis of three factors: (1) Status as a top-level official of a large blended learning program. (2) Status as a supervisor in states that have high levels of participation in online learning, even though school enrollments vary in size. (3) Responsibility for schools that represented demographic diversity. Although the experiences and information from the participants do not represent all administrators of virtual schools in this country, they do provide an informed sample.

The five forum participants represented two public school districts (Mooresville, NC and Detroit, MI), two national charter schools (Carpe Diem Learning Systems and Rocketship Education Network) and one state level program (North Carolina Virtual Public School). The two charter school administrators represented programs in multiple states: Arizona, California, District of Columbia, Indiana, Ohio, Tennessee, Texas, and Wisconsin. Collectively their schools enrolled students from kindergarten through 12th grade and included eight to 40 percent of the enrollees as students with disabilities. A list of participants is also included in this report (Appendix A).

At the time of her participation, the first administrator was the special education director for a school district of 6,100 in North Carolina. Her district had been involved in online/blended instruction since 2008. In the fall of 2015, that district was expected to be a full 1-to-1 with laptops or tablets in every grade (K-12). Roughly 12 percent of the student body in her district had been identified as having at least one disability. Currently she is a special education director for a different school district in North Carolina with 20,000 students that is also 1-to-1 with laptops and tablets in grades 3-12.

The second administrator is the vice president of achievement for the National Education Board of National Charter Schools. Currently, he is in charge of achievement for 6,000 students attending grades K-5 in California, Wisconsin, and Tennessee. His schools have

used various blended models since they opened in 2007. Approximately 11 percent of students in his network are identified as having at least one disability.

The third administrator was included because of her recent history of employment with the Education Achievement Authority in Detroit, Michigan, which is a statewide reform charter district. As of 2015, six high schools and one K-8 school were in her district. She is currently working with Operation Breakthough in Kansas City, Missouri, one of the largest early learning centers in the region. Percentages of students with disabilities in the schools she works with range from eight to 40 percent.

The fourth participant is an administrator at the North Carolina Virtual Public School, the nation's second largest fully online supplemental program. Her program has 35,000 students, approximately 10 percent of which are identified with at least one disability. In addition, her program operates a unique occupational course of study program aimed at transitioning students from school to work and post-high school training, especially directed toward meeting the needs of students with disabilities. This program has 7,400 students and 14 percent are students with disabilities.

The fifth administrator represented Carpe Diem Schools—a multistate charter school network for grades six through 12. Schools in his network employ various learning models but most are some type of blended learning. Percentages of students with disabilities in his schools range from 12 to 25 percent of the approximately 2,500 total students in the network.

COLSD staff reviewed previous literature, revisited findings from previous research activities (e.g., case studies, surveys, and interviews), and considered responses from the first forum of state directors of special education to determine the topics for this second forum. As in the previous forum, the population under consideration consisted of students with disabilities. Therefore, the responses reported are always in the context of meeting the needs of students with disabilities in online learning environments. The 10 topics covered at this forum included:

1. Enrollment, persistence, progress, and achievement
2. Parents' preparation and involvement in their child's online experience and IDEA notifications
3. IDEA principles in the online environment (e.g., free appropriate public education, least restrictive environment, due process protections)
4. IDEA principles in the online environment (e.g., eligibility assessment, IEP development)
5. Access and coordination of related services for students with disabilities
6. Effective and efficient access, sharing, integration, and instructional usage of student response data among the parties involved in online instruction (e.g., instructor, administrator, provider, and vendor), along with privacy issues
7. Effectiveness of teacher preparation in the online learning environment, and promising (or negative) practices that facilitate (or negate) professional development

8. Instructional practices: Integration of optimal evidence-based practices; availability of skill/strategy instruction in online environments; use of the unique properties afforded in online environments
9. Differential access to online learning within and across your schools (e.g., computer or tablet access, connection speed, district restrictions on material access and assistive technologies)
10. Local supervision for online learning in general education and, in particular, for supervision in special education

Participants received a packet of materials prior to the meeting, including the agenda (see Appendix B), and a list of the topics and questions to be considered. The forum began with introductions and a comprehensive discussion of the importance of online learning for students with disabilities from each participant's perspective. Next, each administrator responded to a set of questions about the selected ten topics. The participants determined the order in which they wanted to use to describe their organization's current status, needs, values, and other perspectives pertaining to the topic. The format of the meeting was framed as a conversation in which participants were encouraged to elaborate, explain, and engage in uptake with one another's comments. A representative from COLSD moderated the talk to provide all participants with comparable opportunities to share insights about each topic. For each of the 10 topics, participants responded to five questions:
1. How is your organization currently addressing this topic?
2. Of the (10) topics in our discussion list, how important is this topic?
3. What is working well for you on this topic?
4. What are the top challenges you face and the direction you see your organization taking on this topic?
5. What research question could have a significant impact on your policy or practice?

IDEA principles in the online environment (e.g., eligibility, assessment, IEP development)

This document, the fourth in the series of forum proceeding papers, presents administrators' responses to the set of five questions on the topic of IDEA principles in the online environment. IDEA has many facets regarding the identification, education, and related services for students with disabilities. In this paper we were specifically focused on the IDEA principles associated with disability determination, progress assessment, and IEP development. These topics were identified through COSLD researchers as well as other published and anecdotal information. Initial research activities at COLSD suggested that some students with disabilities who are enrolled in online coursework are counseled out of online classes or programs over issues of "fit" (Greer, Rice, & Carter, 2015; Rice & Carter, in press), yet in other programs students with disabilities are participating and satisfied with their experiences (Burdette & Greer, 2014). Evidence also suggests that while online teachers feel deep commitments to students with disabilities and are willing to spend considerable amounts of time communicating with them and monitoring their progress, (Rice & Carter, 2015), students with disabilities are still at greater risk for not completing courses and failure (Deshler, Rice, & Greer, 2014; Rice & Mellard, 2015). Additional research with more representative samples is

important for furthering evaluating these preliminary findings. The participants in this forum were considered as important to gaining a better understanding of these issues regarding disability determination, placement decisions, and IEP development.

How is this topic addressed in your organization?

When asked how IDEA principles of eligibility, assessment, and IEP development operated in online environments, administrators agreed that they did consider eligibility for special education services in their respective online learning environments and that procedures for *identification* of a disability were similar to those principles that operate in traditional learning environments. The administrators also agreed that IEP *development* for these students was a highly similar process to the traditional school setting. Issues that perplexed virtual school administrators were similar to the concerns in traditional school settings. Such concerns included: who can and should be present at IEP meetings, what goals are appropriate, and how to consider professional judgment of educators and specialists while also being responsive to parental concerns and desires in determining IEP goals, services, and placements.

While identification and IEP development were considered to be highly similar to traditional schools, the administrators explained that IEP *implementation* is very different for virtual schools. Administrators pointed to the fact that data were gathered at a faster pace than in traditional settings because so many more devices are used with so many programs, each of which are recording and archiving students' responses. Further, administrators contended that in many cases these ongoing formative assessments were more efficient than in traditional schools. For example, the administrators said that online schools, with their array of tools that collect incredible amounts of data, allow teachers to make real time decisions about student progress. The instructional and curricular decisions that teachers and other educators make revolve around types and amounts of additional practice necessary for students to meet learning targets. In addition, educators are able to use data to determine what other assessments would provide useful information about student progress.

The administrators felt comfortable making the claim that assessment and remediation were better monitored in their virtual schools than in traditional schools. Further, they also indicated that many IDEA provisions for activities like monitoring student progress towards stipulated goals were outmoded because the IEP legislation around goals did not require that goals be updated as fast as online tools are capable of updating. In essence, the administrators believed that teachers who are well prepared can, and are, able to use data to update student IEP goals in a very efficient manner. The administrators believed that this efficiency is a major advantage of online learning environments in general.

How important is this topic from your perspective?

When asked if IDEA principles of identification, development, and implementation were a critical topic as measured against the other topics, one administrator gave a resounding "no." The other administrators acknowledged agreement with their colleague. The limited discussion

that did ensue focused on implementation policies at state and national levels. The shared perspective was that these polices need to be reviewed and aligned to be more receptive to the affordances of online education. These affordances included the collection and evaluation of students' responsiveness to the instructional activities.

However, some administrators did have an interest in IEP development as a topic because of previously mentioned ethical dilemmas regarding stakeholder participation. More will be discussed regarding stakeholder participation later in this paper.

What direction do you see the school(s) you are in charge of going on this topic?

Most of the administrators said that they were planning to stay the course on current practices since they were experiencing success. As previously mentioned, however, the administrators had a particular interest in IEP compliancy from a policy standpoint. For example, the administrators were interested in ways in which their different configurations as schools (full-time, part-time, blended, fully online, elementary only, secondary only, and K12) were affected differentially by state and national laws and regulations regarding IEP compliance. The administrators wanted to consider ways that they could become more actively involved in the process of shaping policy at these high levels regarding appropriate documentation of students' IEP development and progress.

The administrators' interest in policy was driven by an emerging phenomenon in their virtual schools. The observed phenomenon was that many students with disabilities or students who had experienced little success at demonstrating their knowledge in traditional school settings were able to make more than adequate learning or progress in the online learning environments. Some administrators reported that progress was occurring so rapidly that many students who previously qualified for disability services based on discrepancy models were no longer in need of these services. Moreover, tremendous progress was made after a relatively short time through completing online coursework. The administrators were very interested determining when and how to declassify students who were able, in their view, to function in virtual school settings successfully without disability services. According to the administrators, disability services were no longer necessary because of the "fast data" produced in online learning contexts. In turn, data generated from student responses, along with decisions of educators about data, enabled rapid and accurate remediation.

Finally, the administrators thought that, when possible, using data to engage the students in their own progress monitoring was an innovation that should be explored and incorporated more fully in the future. One administrator told a story of an observation in which she was especially impressed with the student's ability to articulate his own learning challenges and indicate a plan for improving his own learning outcomes. Highly self-regulatory (or executive functioning) behavior is what administrators believed all students must learn in order to take full advantage of online coursework.

What's the top challenge faced?

Some of the administrators represent organizations that are their own local educational agency like traditional school districts. As a consequence they are able to create and manage their students' IEPs. Other administrators are not in this role and rely on the IEPs developed by the local school staff. The administrators at these online schools receive IEPs from traditional schools that they must implement to the greatest extent possible. In this latter scenario, the online school is still obliged to provide related services and ensure that compliance policies are met. Virtual schools are then relegated to an uncomfortable space between the student, the students' parents and traditional schools since they are being asked to implement an educational plan that was developed outside the online school placement and may not be considered appropriate in the online placement.

Almost all of the administrators believed that unique circumstances of a virtual school warranted a new IEP for most students. The administrators explained that revising and even entirely rewriting the IEP is necessary for students with disabilities that enroll in virtual schools because a number of the modifications and accommodations hold no real meaning in online environments, especially fully online ones. An example of such an accommodation with limited utility in the fully online environment is preferential seating. Preferential seating can support students in-class efforts in the traditional or blended learning settings, but when students are working outside the school setting, such as in their own home, the accommodation has less utility. When the virtual schools have the authority, they do create a new IEP when the student enrolls. This rewriting is done within about 60 days when possible. A major focus for these new IEPs for children who come into online educational environments is on re-writing the accommodations for technological affordances and setting more granular goals.

The most significant challenge for the administrators who were not their own local educational agency is that they were unable to participate in the creation of the IEP in many cases and therefore they had no chance to offer input on the student's goals and objectives. These challenges reflected communication and caseload issues. One administrator from a part-time program reported that sometimes her school staff is notified of IEP meetings, but often the staff is not. In addition, even if someone at her school was notified of every meeting, chances are limited that someone from that school could attend, even virtually, because the student-to-educator ratio is so much higher, which puts a strain on the availability for meeting attendance. Not knowing about meetings and then having to field angry communications was frustrating to the administrator because she felt caught in the middle of parental inquiries as to why someone from her school was not at the meeting. She felt bad about saying she hadn't been invited because she didn't want to malign brick-and-mortar schools, particularly when she knew attending every meeting was not possible anyway. However, she also did not want to draw the ire of parents who wanted a representative from the virtual school to be present. At the same time she did not see that the fault was hers for not attending a meeting of which she was unaware.

What are the various stakeholder concerns?

The administrators maintained that although online learning is triggering fundamental discourse about what is curriculum and what is pace, many schools, even virtual ones, continue to operate under outmoded assumptions. One administrator talked specifically about the challenge of defining standardized norms for a special skill (like reading) and what constitutes (or should constitute) a year's growth when students have different kinds of access to online learning. Questions about determining student learning based on norms when individualization and personalization are so much more important were frustrating to the administrators. The administrators thought that developing and implementing more nuanced progress reports was important. The additional detail could have utility for describing learning outcomes and have closer alignment to the affordances of online learning. Essentially learners should be able to demonstrate growth against their initial starting point rather than just against peers or other proficiency standard. Certainly for students with the most significant cognitive disabilities the peer comparison generally falls short and parents and teachers question the relevance of common standards or outcomes.

Along these same lines, questions were raised about whether students should be required to be at the same skill level in all subjects. One administrator pointed out that adults rarely have the exact same individual skill level in math as reading; some people are better readers, while others are better at mathematics. However, he added, most people do tasks where multiple types of skills and knowledge are used simultaneously to meet a learner defined goal. For IEP development and implementation, learner differences across the spectrum of subject areas present a challenge for writing and implementing IEP goals that fully represent the type of work that students are capable of achieving in online learning environments.

To meet their goals of offering more personalized learning opportunities that involve more holistic and integrated disciplinary knowledge, the administrators were interested in working with new instructional models and practices that are more project-based. (Project-based learning generally involves students working in collaborative teams on real world problems that require them to integrate the information that they've learned on a subject to address the presenting problem with realistic solutions. The students create a presentation of their project. The instructor's role is more of a guide or facilitator than providing the direct instruction such as reading skill instruction.) The administrators explained that engaging in new delivery models was difficult since teachers have so little time to think about how to thoughtfully implement meaningful projects.

Another shared concern was the teachers' skills and opportunities for utilizing students' response data. Although fast data were regarded to be helpful in many ways, processes of constantly evaluating tools and programs for their usefulness and figuring out when and how to use them for more sophisticated, integrated purposes presents an on-going challenge because teachers do not have the available time necessary to complete this effectively for all students. These challenges were coupled with the fact that special education teachers who could transition to online educational environments quickly and successfully were in short supply.

What research questions could have a significant impact?

Administrators were asked to suggest important research questions around the IDEA principles of identification, assessment, and IEP development. The general sense of the group was that since no uniform structure exists for funding, monitoring, and evaluating online programs' attention to these IDEA issues, research is needed to be exploratory and/or descriptive in nature. Specifically, the administrators expressed interest in learning from small-scale and qualitative studies with appropriate design and analysis methodologies.

The most pressing research need for these administrators involved using critical orientations to policy in terms of who should be developing the IEP, what policies around the IEP should be for different learning environments, and how stakeholders share responsibilities when students come into online learning environments. Research projects are needed to learn more about the availability and use of technologies (hardware, software, bandwidth) that can make remote participation a reality. The administrators indicated a need for more research aimed at developing policies for hosting IEP meetings that truly involve all of the relevant stakeholders. Hosting needs to address issues of remote participation, notification, communication and collaboration to define meaningful goals.

The administrators also suggested several areas of future research that related to IEP implementation. One area of suggested inquiry was around on-going issues of finding and using technological tools to meet the needs of students with disabilities while circumventing the tendency for students and educators to become overwhelmed by these tools. Overall the administrators were hopeful that the online environment, with its emphasis on personalization, had the power to lessen the stigma of disability status in ways that allowed students to develop the self-efficacy to sustain their motivation to learn.

Another area of proposed research revolved around the co-teaching relationship and how to use this, or similar configurations, to increase students' access to support professionals who have been trained in instructional methods for students with disabilities. The administrators were interested in increasing the number of well-prepared teachers because they rely on the co-teaching relationships and other collaborative configurations to make sure that IEP goals are implemented properly. Special education teachers and other support professionals are sometimes in short supply and both general and special education teachers face substantial challenges such as planning time management and the negotiation of shared responsibilities as they take on additional instructional roles. Many of these could be ameliorated by further inquiry into these co-teaching relationships.

Below is a summary of research questions.
1. How do online schools negotiate the challenges of IEP development and implementation alongside traditional schools and as their own local education agencies?
2. How can technological affordances be more successfully included in IEP documents and whether specific tools or programs should be included?

3. What professional development activities and knowledge do special education teachers need in order to transition to online/blended teaching?
4. What is the state of teacher preparation for online learning with regard to implementing IEPs?
5. How can teachers effectively assist students to participate in their own IEP progress monitoring?
6. What preparation and professional development supports teachers' implementation of technology as part of IEP implementation?
7. What are the necessary elements of declassification disability status in online learning settings?
8. How do students experience their disability label in online learning versus the brick and mortar setting?

Implications

Discussion around this topic has several implications. First, administrators are highly interested in policy discussions that place the work that they do in a fuller context of IDEA principles, which is consistent with findings from the superintendent's forum paper #3 in this series, which focused on IDEA principles of free appropriate public education, least restrictive environment, and due process. With promises of personalization paramount to eliciting participation in online learning environments, administrators believe it is superfluous or even onerous having to consider individualization in the eyes of the law in addition to student driven personalization. Further, the burden of attending to IEP development and implementation that teachers must carry in all educational environments is compounded when teachers lack experience with IEP principles generally and/or in online learning. Therefore, a primary focus should be on recruiting, retaining, and sustaining teachers who understand compliancy but who are also nimble and creative thinkers in terms of using technology to meet students' needs. The superintendent forum paper #7 in this series discusses teacher preparation and development generally.

In short, much that is still unknown about how stakeholders (teachers, parents, and students) form and frame identities in online contexts. The administrators are genuinely interested in learning what kinds of personal and professional paradigm shifts have to be made in order to transition to online learning. The administrators have strong suspicions that disability status can be effectively hidden in fully online and blended settings because personalization for all students is such a focus. What is unknown is whether the ability to hide or minimize a disability label is perceived as positive by students and their families.

Further, we do not know what impact the increased declassification rates have on students with disabilities from a learning outcomes perspective and from a learner identity perspective. The fast data possible in online learning environments should provide opportunities to track recently declassified student progress on a large scale, and inform our understandings about what happens when students come into online learning with identified disabilities and then lose those identities while they are in the environment. Further, since

attrition rates are high in online learning for all students, including students with disabilities, we do not know what happens to students when/if they have to eventually return to traditional schools or when they transition to work and post-secondary education. When more is known about these attrition and retention issues, teacher preparation, parent education, and student support for activities like self-regulation in online learning and beyond will be more efficacious.

In summary, below are some additional questions for policy and practice suggested on this forum topic.

1. The online environment is proposed as a personalized learning setting. How does disability status moderate the learning and outcomes?
2. IDEA was conceptualized for learners in the traditional school setting. How do concepts of disability determination, progress assessment, and IEP development apply in an individual online environment?
3. How are the traditional supports for students with disabilities in IDEA adapted to the students' personalized online environment?

Rice, M., East, T., & Mellard, D.F. (2015). *IDEA principles in the online environment: IEP and eligibility*: Superintendent Forum Proceedings (Report No. 4). Lawrence, KS: Center on Online Learning and Students with Disabilities, University of Kansas.

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Deshler, D., Rice, M., Greer, D. (2014, April). *Which demographic variables predict final grades for high school students enrolled in online English/ELA courses? Results from a regression analysis.* Presentation at the annual meeting of the American Educational Research Association. Philadelphia, PA.

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Appendix A

Forum Administrators

OSEP AND COLSD FORUM
Practices and Challenges in Online Instruction for Students with Disabilities

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Appendix B

Forum Agenda

OSEP and COLSD Forum
Practices and Challenges in Online Instruction for
Students with Disabilities

MARCH 31 – APRIL 1, 2015

AGENDA

NASDSE Conference Room
225 Reinekers Lane, Suite 420
Alexandria, VA 22314
703-519-3576

<u>**Tuesday, March 31, 2015**</u>

12:00 - 12:45   Working Lunch
- Welcome: *OSEP staff and Bill East*
- Participant introductions: *Your district experiences with online instruction*
- Overview: *Explanation of how we hope this discussion proceeds*

12:45 - 1:45   Discussion *Topic #1:* Enrollment, persistence, progress and achievement for students with disabilities

1:45 - 2:00   Break

2:00 – 2:45   Discussion *Topic #2:* Parent preparation and involvement in their child's online experience and IDEA notifications

2:45 - 3:30   Discussion *Topic #3:* IDEA principles in the online environment (e.g., FAPE, least restrictive environment, due process protections)

3:30 - 4:15   Discussion *Topic #4:* IDEA principles in the online environment (e.g., eligibility assessment, IEP development)

4:15 - 4:30   Break

4:30 - 5:15   Discussion *Topic #5:* Access and coordination of related services for students with disabilities

5:15 - 5:30   *Wrap-up, suggestions for improving our process and preview for day two. Dinner plans?*

<u>Wednesday, April 1, 2015</u>

8:15 - 8:30   Review   *Review of yesterday and today's preview*

8:30 - 9:15   Discussion *Topic #6:* Effective and efficient access, sharing, integration, and instructional usage of student response data among the parties involved in online instruction (e.g., instructors, administrator, provider, and vendor) and addressing privacy concerns

9:15-10:30   Discussion *Topic #7:* Effectiveness of teacher preparation in the online learning environment; and promising (or negative) practices that facilitate (or negate) professional development

11:15-11:30   Break

10:30-11:15   Discussion *Topic #8:* Instructional practices: Integration of optimal evidence-based practices; availability of skill/strategy instruction in online environments; use of the unique properties afforded in online environments

11:30 – 12:15   Discussion *Topic #9:* Differential access to online learning within and across your schools (e.g., computer or tablet access, connection speed, district restrictions to material access & assistive technologies)

12:15 – 1:00   Working Lunch – Discussion *Topic 10:*   Local supervision for online learning in general education and in particular for supervision in special education

1:00 – 1:15   Discussion   of your views on the Center's future activities

1:30 - 1:45   Wrap up: *Our next steps with this information: draft a summary; share the summary with you for accuracy and completeness; draft a report on the topics and share with you for edits regarding accuracy and completeness; and complete revisions and disseminate.*
Your closing comments
Reimbursement issues and our closing comments
Thank you and safe travels