



**GOVERNOR'S ADVISORY COUNCIL FOR EXCEPTIONAL CITIZENS (GACEC)
GENERAL MEMBERSHIP MEETING
7:00PM NOVEMBER 14, 2023
HYBRID MEETING**

MEMBERS PRESENT: Al Cavalier, Matt Denn, Bill Doolittle, Karen Eller, Ann Fisher, Cory Gilden, Tika Hartsock, Jessica Mensack, Molly Merrill, Beth Mineo, Maria Olivere, Erika Powell, Jen Pulcinella, Stefanie Ramirez, Breneé Shepperson

OTHERS PRESENT: Cindy Brown/Office of Early Childhood Intervention (OECI), Dale Matusевич/Exceptional Children's Resources Workgroup (ECR) of Delaware Department of Education (DDOE), Lillian McCuen, Brad Melvin, Cassandra Pierce (potential GACEC applicant), Eileen Reynolds, Erin Rich/Department of Health and Social Services (DHSS), Hope Sanson/(DHSS), Daniella Spitelli (potential GACEC applicant), Susan Veenema/ (ECR) of (DDOE).

STAFF PRESENT: Pam Weir/Executive Director, Lacie Spence/Administrative Coordinator and Theresa Moore/Administrative Supports Specialist

MEMBERS ABSENT: Nancy Cordrey, Kristina Horton, Thomas Keeton, Trenee Parker, Meedra Surratte, Erik Warner

ADMINISTRATIVE ACTIONS: Chairperson, Ann Fisher, called the meeting to order at 7:03 pm. There was a quorum of members present. A motion was made to approve the November agenda and the motion was seconded by Molly Merrill. The motion passed unanimously. Jennifer Pulcinella made a motion to approve the October minutes and Maria Olivere seconded the motion. The motion was approved with Molly Merrill abstaining. A motion was made to approve the October financial report by Bill Doolittle and the motion was seconded by Jen Pulcinella. The motion passed unanimously.

PUBLIC COMMENT: There was no public comment for this meeting.

COMMITTEE REPORTS:

INFANT AND EARLY CHILDHOOD COMMITTEE: Jennifer Pulcinella reported that the Committee received a presentation from Cindy Brown, Director of the Office of Early Childhood Intervention (OECI). The presentation included the following:

- Mission and Vision: This was presented to us at the retreat and has been tweaked for grammar and clarification. It will be released to the public soon.
- Staff composition: all positions have been filled and are working full steam ahead.
- Immediate priorities of the office: Indicators 6 and 7 are complete and the data for Indicator 12 is wrapping up.
- Questions specific to the presentation: the Committee agreed that the mission and vision of OECE is inspiring and well thought out. They represent all children and show the inclusivity of thinking of the families and teachers as well as the children. Delaware needs to find a way to retain teachers and provide more supports for them to help with the added stress of the additional children being brought into the system through the new DOE Pre-Ks.

CHILDREN AND YOUTH COMMITTEE: Tika Hartsock made a motion for Council to approve a letter be sent to DDOE requesting that we receive the due process cases for renewal and state complaints on a quarterly basis instead of at the end of the year. The motion passed unanimously.

The Children and Youth Committee did not get a chance to meet to discuss goals at the Annual Council Retreat, so they discussed goals tonight. They discussed goals two (related to School Resource Officers), three (related to state complaints for equity issues), and four (related to the impact of school absences due to medical conditions) and created a SMART goal for each area. They refined the previously written SMART goal for area one (related to due process and state complaint decisions). After goals were established, they dug deeper into goal one and created some action steps. The first action step was to bring a motion to Council at the November meeting to request that DDOE send us due process and state complaint decisions quarterly instead of annually. Another action item is for Tika to reach out to the Policy and Law Committee to see what (if any) actions they are taking regarding reviewing due process and state complain decisions and to see if a liaison between our committees should coordinate this review or if the Children and Youth Committee should be the primary reviewers for due process and state complaints.

The Children and Youth Committee goals for 2023-2024.

1. The Children and Youth Committee will review at least 30% or more of DDOE due process decisions for 2022-23 school year for appropriate follow up (communication with families, compensatory services, conformation of corrective action, etc.) and provide written feedback with questions and/or recommendations to DDOE by July 2024.
2. Regarding School Resource Officers. The committee will submit a letter advising and making recommendations regarding appropriate adjustments to draft bill sponsor, the Secretary, and education chairs by the end of March 2024.

3. Children & Youth Committee will study three state complaints and/or due process cases involving equity issues among students with disabilities within the last two years in order to recommend solutions to the Delaware Public Education Ombudsperson Program thru Education Equity Council by June 2024.
4. The committee will make recommendations to DDOE about the impact of school absences due to medical conditions and lack of nursing based on data collected in conjunction with council ad hoc committees by June 2024.

ADULT AND TRANSITION SERVICES COMMITTEE: There was no committee report for this meeting. Erika Powell was the only member present from this committee tonight.

POLICY AND LAW COMMITTEE: Beth Mineo made a motion to approve the following Policy and Law (P&L) recommendations to Council regarding the Policy and Law (P&L) Memo dated 11/13/23. The motion passed with Matt Denn abstaining.

Recommendations to Council:

1. The first regulation discussed (#1 in the P&L memo) is about ensuring that physical education is provided to students K-8, visual and performing arts to students in K-6, and health education is provided in K-12. The Committee noted that James H. Groves programs are exempt from all these provisions. That prompted discussion of the disparities in educational opportunities experienced by participants in the prison education program. The recommendation included in the original DLP memo was that Council may wish to question the exclusion of Groves' students from health education, arts and physical education requirements, but this recommendation will be modified to recommend that Groves programs should not be exempt, and that the DDOE should prioritize how to make these programs available in alternative and adults education settings. The committee recommends endorsement of this modified recommendation from the DLP.
2. The next regulation discussed pertains to rules governing student participation in extracurricular activities, and we recommend endorsement of the DLP recommendation emphasizing that flexibility may be necessary to ensure that students with disabilities have an equal opportunity to participate in extracurricular activities.
3. The final regulation represents an amendment to the Childhood Lead Poisoning Act. The DLP memo contained two recommendations. The Committee recommend endorsing the first element, which addresses the potential for inappropriate use of the samples.

After discussion, the Policy and Law Committee recommend a modification of the second element. Rather than questioning the 60-day timeline suggested by DPH, we recommend that DPH adopt a triaged/staggered approach to findings of elevated blood lead levels depending on the magnitude of the elevation. For example, when lead levels are very high this could prompt an immediate referral to DPH, whereas mildly elevated levels could be triaged differently, and notification could be delayed to DPH while the primary care provider and other state supports are initiated to support child and family.

The following is the November 2023 Policy and Law Memo dated for 11/13/2023:

I. PROPOSED STATE REGULATIONS

- **Proposed Delaware Department of Education (DDOE) regulation to amend 14 Del. Admin Code 503 regarding Instructional Program Requirements, 27 Del. Register of Regulations 299 (November 1, 2023).**

The Delaware Department of Education (DDOE) proposes to amend 14 DE Admin. Code 503 Instructional Program Requirements. The following amendments have been proposed.

General Language Changes

Throughout the proposed regulations, “local school” is changed to “school.” Further, “standards grade level expectations” have been changed to “content standards.”

5.0 Physical Education

Language was included to clarify that physical education must be provided to kindergarten students (previously, one paragraph includes kindergarten in the requirements, but the following paragraph regarding who must be enrolled in these classes previously only referred to students in grades 1-8).

Additional language is added clarifying that James H. Groves programs are not required to provide physical education (there was already an exemption, the proposed language just further clarifies that these programs are not required to provide physical education).

6.0 Visual and Performing Arts

Language was included to clarify that visual and performing arts must be provided to kindergarten students (previously, one paragraph includes kindergarten, but the following paragraph about what students must be enrolled in these classes previously only referred to students in grades 1-6).

Additional language is added clarifying that James H. Groves programs are not required to provide physical education (there was already an exemption, the proposed language just further clarifies that these programs are not required to provide physical education).

7.0 Career and Technical Education

Language is removed stating that 7th and 8th grade career and technical education programs must be provided “no later than the 2017-2018 school year.”

9.0 Health Education

An entire new section is added introducing health education requirements:

9.0 Health Education

9.1 School districts and charter schools shall provide instructional programs in health education for each grade K through 12 that meet the hours requirements outlined in 14 DE Admin. Code 551. James H. Groves High School program is not required to provide instructional programs in health education to its students and is exempt from the provisions of this subsection.

9.2 School districts and charter schools shall provide comprehensive health education programming for each grade K through 8 that demonstrates alignment to the Department of Education's adopted health education content standards.

9.3 All public school students in grades 9 to 12 shall complete the credits in health education necessary to graduate from high school through health education programming that demonstrates alignment to the Department of Education's adopted health education content standards.

Conclusions

Most changes are minor, and primarily clarify existing regulations. The new proposals to require schools to provide instruction in health education is generally a positive change.

However, of concern are the exemptions for James H. Groves programs. The education provided to these students should not be of lesser quality than the education provided to other students in Delaware. Further, while many students voluntarily choose to participate in James H. Groves programs as an alternative pathway to a high school diploma, for other students, such as those in Delaware's adult prison system, the James H. Groves program is the only option provided to work toward a high school diploma. Eliminating requirements for health/physical education and arts education programs from Groves programs effectively eliminates any opportunity for incarcerated students to benefit from these programs. Further, as discussed below, there is evidence that incarcerated students have unique needs for these programs and would benefit substantially from them.

There is a demonstrated need for health and physical education among students in prison. Formerly incarcerated individuals statistically have worse health outcomes than the general population and have higher rates of many preventable diseases that are often discussed in high school health classes.¹ Research suggests that health education programs for incarcerated students increase knowledge and understanding of critical health information and susceptibility to at-risk behaviors.² Further, evidence suggests that structured opportunities for physical movement in prisons settings have significant positive health outcomes among incarcerated individuals. Research indicates that physical activity programs in prisons "improve[] the mood and anxiety of inmates as well as overall health."³

¹ See *Social Determinants of Health Literature Summaries: Incarceration*, OFF. DISEASE PREVENTION & HEALTH POPULATION, <https://health.gov/healthypeople/priority-areas/social-determinants-health/literature-summaries/incarceration> ("When compared to the general population, men and women with a history of incarceration are in worse mental and physical health. Data from the Bureau of Justice Statistics found that, in 2011, 44 percent of people who are incarcerated had a mental health disorder. 14 Studies have shown that when compared to the general population, people of both sexes who are incarcerated are more likely to have high blood pressure, asthma, cancer, arthritis, 15 and infectious diseases, such as tuberculosis, hepatitis C, and HIV.")

² See Jean N. Clark, Richard N. Van Eck, Afreda King, Brenda Glusman, Annie McCain-Williams, Sandra Van Eck, Frances Beech, *HIV/AIDS education among incarcerated youth*, 28 J. CRIM. JUS. 5 (2000), [https://doi.org/10.1016/S0047-2352\(00\)00056-8](https://doi.org/10.1016/S0047-2352(00)00056-8).

³ L. Gomez Pastor & SD Bravo Cucci, *Physical activity in prison: Should it be a first-line healthcare intervention?*, 20 REV. ESP. SANID ENIT 1 (2018), <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC6279183/#:~:text=Three%20groups%20were%20used%3A%20cardiovascular,as%20overall%20mental%20health%203%20>.

Incarcerated individuals have also been shown to benefit substantially from arts programs. Research suggests that arts programs help students “develop better mental outlooks,” reduce[]violence within the prison system,” and “decreas[e] parolees’ recidivism.”⁴

Incarcerated students, whose only option for a high school diploma program is a Groves program, arguably have the most need for these programs and would uniquely benefit from them. Groves programs should not be exempted from requirements to provide these critical programs; rather, the Department of Education should prioritize how to make these programs available in alternative and adult education settings.

Recommendation: Councils should generally support the proposed regulation but may wish to question DDOE’s exclusion of Groves students from the health education, arts, and physical education requirements.

- **Proposed Delaware Department of Education (DDOE) regulation to amend 14 Del. Admin Code 1001 regarding Participation in Extra Curricular Activities, 27 Del. Register of Regulations 308 (November 1, 2023).**

The DDOE proposes to repeal the entirety of 14 Del. Admin. Code 1001 Participation in Extra Curricular Activities. DDOE gives the explanation that the regulations “is no longer necessary” as “academic eligibility criteria for middle and high school students’ participation in extracurricular activities is established by the Delaware Interscholastic Athletic Association (DIAA) Board” pursuant to 14 Del. C. § 304(3)(listing as one of the DIAA’s duties, powers, and authority to “[d]etermine the existence of a violation of the regulations by a member school, athlete, coach, administrator, official, or spectator and penalize a violation by official reprimand, placement on probation, fine, suspension, or other action as the Board deems appropriate.”) Previously the regulation that is to be struck read:

Local school districts and charter schools shall establish their own academic eligibility criteria for participation in all extracurricular activities except for interscholastic athletics. The academic eligibility criteria for interscholastic athletics is established in 14 DE Admin. Code 1009.2.6 DIAA Senior High School Interscholastic Athletics, and in 14 DE Admin. Code 1008.2.6 DIAA Junior High and Middle School Interscholastic Athletics.

Comment: In establishing and implementing academic eligibility criteria applicable to students with disabilities, districts are reminded that some flexibility may be contemplated by Federal guidelines. See 34 CFR Sec. 104.4.

The comment that can be found in DDOE regulation 1001, above, cites to the potential need for eligibility flexibility per 34 CFR Sec. 104.4, which is a U.S. Department of Education regulation implementing Section 504 of the Rehabilitation Act’s prohibition of discrimination based on disability. Under Section 504 of the Rehabilitation Act and the Americans with Disabilities Act, Delaware’s DIAA must offer an equal opportunity to students with disabilities to participate in sports, which may include the requirement to provide reasonable accommodations such as changes to policies. *In re: Dear Colleague Letter of Jan. 25, 2013* (OCR), available at

⁴ See Robert Jerome Sullivan, *Breaking Into Prison: Art Education in Action*, (Master’s degree dissertation, University of Florida) (2013) <https://nicic.gov/resources/nic-library/all-library-items/breaking-prison-art-education-action>, see also Danielle Maude Littman and Shannon M. Sliva, *Prison Arts Program Outcomes*, 71 J. CORR. ED. 3 (2020), <https://www.jstor.org/stable/27042216>; Amanda Gardner, Lori L. Hager, & Grady Hillman, *Prison Arts Resource Project: An Annotated Bibliography*, NAT. ENDOWMENT ARTS (2014).

<https://www2.ed.gov/about/offices/list/ocr/letters/colleague-201301-504.pdf>. Likewise, students with IEPs must be afforded an equal opportunity to participate in extracurriculars, including with supplementary aids and services deemed appropriate and necessary by their IEP team. 34 CFR § 300.107.

Of note to Council, the last provision of the current regulation, concerning potential eligibility criteria flexibility for students with disabilities, does not appear in the DIAA statutory language, or in other DIAA regulations. The DIAA regulations define an “IEP”, “Student with a Disability” and “Unified Athlete” (student with intellectual disability or autism) but otherwise only discuss eligibility in connection to “unified sports” (a co-ed program that combines students with and without autism or intellectual disabilities), or at what programs / schools students with disabilities who are placed in special schools or programs can participate in. See 14 Del. Admin. C. §§ 1108 and 1009. Of tangential note, § 1009.2.3.3.1 § 1008.2.3.2.1 excludes alternative schools from special schools or programs, although alternative schools are at times used as an IEP placement for a student with a disability, rather than a disciplinary placement.

When school systems have an eligibility requirement for a nonacademic program that is not strictly related to an ability to participate in the program, even with reasonable accommodations, it may rise to discrimination if the requirement tends to screen out students with disabilities. See, e.g., *Mowery v. Logan County Bd. of Educ.*, 58 IDELR 192 (S.D. W.Va. 2012) (allowing a student who was prohibited from attending his school's senior class dance on the basis that he was on homebound instruction to pursue Section 504 and Title II claims against his district). Likewise, eligibility criteria that are inflexibly tied to discipline may have discriminatory impact against students whose behavior problems may be a manifestation of their disability. See, e.g., *Ontario-Montclair (CA) Unified Sch. Dist.*, 24 IDELR 780 (OCR 1996) (instructing a district to modify its eligibility criteria where they had a behavior standard that made students with a specific number of disciplinary actions ineligible, to respond to the individual needs of students with behavioral health disabilities); and *Chrysalis (CA) Charter Sch.*, 113 LRP 27944 (OCR April 11, 2013) (concluding that because a district banned a child from recess, field trips, etc., based on grades and behaviors related to disability, it violated Section 504's antidiscrimination provisions).

Council may wish to recommend that DDOE, rather than striking DDOE/DIAA regulation §1001 in its entirety, maintain a modified statement of non-discrimination here, such as: “In establishing and implementing academic eligibility criteria applicable to students with disabilities, ~~districts are reminded that~~ some flexibility may be necessary to ensure that students with disabilities have an equal opportunity to participate in extracurricular activities, as contemplated by Federal guidelines. See e.g., 34 CFR Sec. 104.4 and 34 CFR § 300.107” (subtractions shown by strikethrough and additions by underlining), or DDOE could otherwise incorporate such a statement elsewhere in the DIAA regulations.

- **Proposed Delaware Health and Social Services (DHSS)/Division of Public Health (DPH) regulation to amend 16 Del. Admin Code 4459A, regarding the Childhood Lead Poisoning Act, 27 Del. Register of Regulations 315 (November 1, 2023).**

The Delaware Health and Social Services (DHSS)/Division of Public Health (DPH) proposed regulations to “establish standards for blood lead level screening and testing of children between 12 and 24 months of age.” However, the majority of what is published in this proposal has already been adopted as a final regulation as of August 1, 2023. This includes the requirement for blood testing, the frequency of that

testing, religious exemptions, and reporting requirements. There is only one substantive change in the proposal: DPH's investigation and reporting obligations.

The proposal would add a 60-day timeline for investigating instances when a child's blood level is elevated. In such cases, the Division "shall determine: the child's residential address from birth through testing, the site of the child's lead exposure, and the property owner of the site at which the child became exposed to lead." Any confidential health information would not be publicly accessible. Additionally, "[w]ithin 10 days of identifying the site of lead exposure, the Division shall notify the Delaware State Lead-Based Paint Program of the location and contact information of the property owner." These communications will be obtainable under the Freedom of Information Act.

First in terms of privacy, it is important to note that lead exposure data has recently stirred controversy. See e.g., <https://newjerseymonitor.com/2022/07/13/newborn-screening-program-used-to-aid-criminal-investigation-public-defender-says/>. Presently, this regulation addresses that documents will be confidential but it does not address sample retention, nor safeguard this information from potential subpoenas such as what was utilized in the New Jersey news article.

Most importantly, however, is the 60-day timeline for investigation. Although once the site of lead exposure is definitively identified, DPH's next steps must be within 10 days, DPH has 60 days to get to the point of triggering the 10-day timeline (note: this is consistent with 16 Del. C. § 2610). If a child is still at risk of exposure in their current home, such a lengthy timeline can prolong and increase the lead exposure the child faces, which can have long-term health implications and increase the potential for disability. For information about environmental lead exposure and impact on children's health, see: <https://www.yalemedicine.org/conditions/lead-poisoning-in-children> and <https://www.cdc.gov/nceh/features/leadpoisoning/index.html>. Considering the potential impact, and compounding risk of continued exposure, it is confounding why this time-period is so long. Although this 60-day period is consistent with the floor set by statute, DPH could shorten the timeframe, excepting extraordinary circumstances that require the full 60-days.

Recommendations:

- 1) **Council may wish to inquire as to DPH's policy with respect to storage and destruction of blood samples or information that could identify sensitive genetic and health information, and steps DPH takes to safeguard samples from uses not contemplated by the lead poisoning law.**
- 2) **Council should support investigative and reporting requirements generally as a brain injury prevention effort, but Councils may wish to question the 60-day timeline that DPH is establishing for investigations and urge DPH to shorten the timeline except for extraordinary circumstances.**

II. FINAL STATE REGULATIONS

- **Final Delaware Health and Social Services (DHSS)/Division of Medicaid and Medical Assistance (DMMA) RULEMAKING to amend Title XIX Medicaid State Plan regarding Pharmacy Over the Counter (OTC) & Physician Administered Drugs (PAD), 27 Del. Register of Regulations 338 (November 1, 2023).**

The Delaware Health and Social Services (DHSS)/ Division of Medicaid and Medical Assistance (DMMA) proposed to amend Title XIX Medicaid State Plan regarding pharmacy Over the Counter (OTC) and Physician Administered Drugs (PAD). The purpose of this amendment is "to align Delaware's Medicaid State Plan with current reimbursement policy, provide for future flexibility with less administrative

burden, and to update the State Plan in anticipation of future OTC drugs/drug classes that Medicaid will be required to cover, thus reducing the need to submit multiple State Plan Amendments.” DHSS/DMMA states that these changes are partially to allow flexibility in programs because they anticipate that Medicare programs will be required to cover new over the counter products, including OTC naloxone and OTC oral contraceptives. No changes were made from the proposed version of this rulemaking. Previously, Councils provided support for these proposed changes. DMMA thanked Councils for their support.

- **FINAL DEPARTMENT OF HEALTH AND SOCIAL SERVICES DIVISION OF MEDICAID AND MEDICAL ASSISTANCE PUBLIC NOTICE REGARDING GROUND EMERGENCY MEDICAL TRANSPORTATION, 27 Del. Register of Regulations 340 (November 1, 2023).**

Department of Health and Social Services (DHSS), Division of Medicaid and Medical Assistance (DMMA) proposed to amend Title XIX of the State Medicaid Plan about Ground Emergency Medical Transportation (GEMT). Specifically, this rulemaking would increase reimbursement for emergency transportation providers. The proposed regulation will increase the reimbursement rate for GEMT. No changes were made since this regulation was originally proposed. According to the notice, GACEC submitted comments in support of the changes. DMMA thanked the GACEC for its support.

PERSONNEL COMMITTEE: There was no Personnel Committee report at tonight’s meeting.

DDOE REPORT: Susan Veenema, of the Exceptional Children’s Resource Workgroup (ECR) of DDOE went over Indicator 4- Methodology (suspension & expulsion of students with disabilities over 10 days). She stated there are 42 LEAs (local education agencies) in Delaware. The current ratios are as follows:

Indicator 4A

- Currently rate ratio of 2.0 over 3-year period with a cell size of 15.
- Or 5.0 in one year with a cell size of 5.

Indicator 4B

- Currently rate ratio of 2.0 over a 3-year period with a cell size of 10.
- Or 5.0 in one year with a cell size of 5.

The following are the changes to Indicator 4 beginning FFY23.
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- Starting in March 2024 based on SY data 2022-23, the ratio will change based on OSEP requirements.
- Indicator 4A will be rate ratio of 3.0 with no cell/n size.
- Indicator 4B will be rate ratio of 3.0 with a cell size of 3.

During ECR general monitoring of LEAs beginning next year they have put in place that part of their monitoring will include a review of LEAs discipline policies and procedures. Discussion ensued about the discipline policies and procedures. Susan also presented information that was

collected thru surveys, LEAs and Special Education directors about the discipline taking place in the LEA's based on the 2022-23 school year. Discussion ensued.

Areas to note while reviewing the data:

- Students with Disabilities vs. Students without Disabilities suspension rates
- Total population of both.
- Students with Disabilities suspended vs. general education student enrollment.
- Suspension data by ethnicity.
- Suspension data by school.
- What is happening at the systems level across the LEA and at each school.

Susan thanked Council for their feedback tonight.

Dale Matusевич/Delaware Department of Education (DDOE) presented to the Council info on the new Guidance Document released in July. Pam shared these websites in the chat about the guidance document. <https://sites.ed.gov/idea/osep-releases-updated-guidance-to-strengthen-states-general-supervision-requirements/>, <https://ncsi.wested.org/recources/differentiated-monitoring-and-support-dms/>, <https://sites.ed.gov/idea/state-monitoring-support/#DMS>, <https://ed.gov/idea/grantees/#DMS>.

Creditable allegations – all phone calls received from parents or stakeholders are given information on the correct person they need to contact for the issues they are having. All calls are followed up on after the parent has contacted the correct person in the school district to make sure they get results. Dale is looking into ways to assist LEAs in providing data by proposing to have a big data retreat with the LEAs during the summer to pour over data and the LEAs accountability framework. The Adult and Prison Ed is included in these data dives and how to improve the systems within the prison realm.

CHAIR REPORT: Chairperson, Ann Fisher, announced guests and members absent for the evening.

DIRECTORS REPORT: Executive Director, Pam Weir, announced the Budget hearing was today and it went very well. GACEC did not ask for any additional funds, just to continue support for the endeavors we have already taken on this year.

DLP has been very active in reviewing budgets of other agencies including DDOE and DHSS. Pam shared analysis with only the Leadership Committee to provide feedback due to the short turnaround time needed so that DLP can include GACEC feedback in their comments. She also reminded the Leadership Committee to send their feedback including approvals as soon as possible if not already done.

ADJOURNMENT- Tika Hartsock made a motion for adjournment and Molly Merrill seconded the motion. The motion was approved, and the meeting was adjourned at 8:48 pm.