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https://www.regulations.gov/contentStreamer?documentId=ED-2017-OS-0074-13061&attachmentNumber=1&contentType=pdf	See attached file(s)	364
https://www.regulations.gov/contentStreamer?documentId=ED-2017-OS-0074-14521&attachmentNumber=1&contentType=pdf	See attached file(s)	225
https://www.regulations.gov/contentStreamer?documentId=ED-2017-OS-0074-9786&attachmentNumber=1&contentType=pdf	<p>Sexual assault is a hideous crime. I have daughters in college, and how college handle such things are very important. In addition to that, it seems very clear that many colleges have mishandled many of the cases that have come before them, sometimes favoring the accused, other times in favor of the accusers. It seems apparent that most colleges are far more interested in protecting themselves, not their students. There for we must put in place guidelines that are clearly defined that protect all students, establish protections and assistance to be made available for all students in need, and give direction on due process protections that should be common sense.</p> <p>Attached you will find my thoughts on what a college system should look like, giving protections for all students. I have copied and pasted the introduction and the closing in here, but the entire document should be read.</p> <p>Put in place strict guidelines that protect all students. Make it clear these are not optional. In cases where crimes have alleged to have occurred, any and all efforts to get the police to take the case should be priority. If the accuser refuses, then all efforts must be made to protect both students until one is found at fault with a high degree of certainty and while observing rules of due process. Also, any result, both a finding of responsible or not, should be easily and quickly reviewed by both State and Federal. If they see the college has failed to live up to its promise of neutrality and fairness, the state can override the punishment.</p> <p>I would also suggest that someone should do a case by case review of all cases over the last 6 years. If Allegany, UCL, U of Cincinnati, Amherst, and Colorado State University can have cases where they so clearly got it wrong and settled in lawsuits, it stands to reason that they among many other colleges got it wrong with students who simply do not have the ability to sustain a 2 to 3 year lawsuit. At the very least, these students who would not have been found responsible under a fair system should get a refund from the college for their tuition, meal plans and housing fees, and have their records expunged. Accusation doesn't equal guilt, and to presume it does not only does a grave injustice to those who are falsely accused, but it also undermines confidence in the existing system.</p> <p>Colleges should not be quasi-judicial systems. They simply are not capable. Their job should be to protect students, all students. If a student wants justice or punishment, that is what the criminal courts are for. They also have the ability to civilly sue the person they say is responsible. If a college is forced to hold hearing, it must take pains to make sure it's staying as a neutral fact finder.</p> <p>I would also suggest that some of the OCR offices on colleges, such as the ones who have ignored</p>	475

	<p>exculpatory evidence, or those who have expelled students when the 'victim' insisted they were innocent, lose their jobs. Only when colleges understand not doing their job correctly will result in personal loss will they change. If any student has been suspended or expelled without being allowed a hearing, knowing the charges they were accused of, unable to have any meaningful form of cross examination, or any other clear breach of normal due process, then the college needs to expunge their record, offer a letter taking fault, refund money paid and re-enroll the student asap with assistance if needed. The exceptions to this would be if there was an independent inquiry, such as a criminal case, or a lawsuit that established guilt. If the criminal case resulted in a not guilty, or less, then these consequences for the college should be automatic.</p> <p>In short, the ability to get academic accommodations, movement in and out of classes, or dorms, the ability to get counseling, and the ability to get basic NCO should be made easier for all. Advocates should be automatic.</p> <p>But the ability to suspend or expel students needs to be much harder.</p> <p>Colleges should first Educate, then Correct bad behavior, then Protect, and only in extreme cases where there is ample proof, Punish.</p> <p>Thank you for taking the time to read this.</p> <p>Vincent Morrone</p>	
https://www.regulations.gov/contentStreamer?documentId=ED-2017-OS-0074-10515&attachmentNumber=1&contentType=msw12	See attached file(s)	450
https://www.regulations.gov/contentStreamer?documentId=ED-2017-OS-0074-15285&attachmentNumber=1&contentType=pdf	<p>To:Assistant General Counsel Hilary Malawer Regulatory Services Division, Department of Education From:Loribeth Weinstein, CEO Jewish Women International Date:September 20, 2017 Re:Department of Education Proposed Rule: Evaluation of Existing Regulations</p> <p>Jewish Women International (JWI), a leading national organization working on DV/SA, urges the Department of Education to put students first by maintaining all guidance on Title II, Title VI, and Title IX in its current form and preserving 34 C.F.R. pts., numbers 1 thru 1299.</p> <p>JWI, a leading advocate for campus sexual assault and dating violence prevention, condemns any rollback of protections for survivors of violence on college campuses. Incidents of sexual assault on college campuses are alarmingly frequent - one in five women and one in sixteen men will be sexually assaulted in college, and over ninety percent of these students will not report the assault. (National Sexual Violence Resource Center - Statistics about Sexual Violence, 2015)</p> <p>It is imperative the Department of Education provides protections to survivors under Title IX of the Education Amendments Act of 1972. Instead of stripping away Title IX implementation regulations, we urge the Department to work to support survivors of violence and provide additional resources to schools and colleges to combat the culture of violence.</p> <p>Title IX requires schools that receive federal funding to provide equal access to educational programs and activities. Sexual assault, dating violence, and stalking create hostile educational environments that impede survivors ability to achieve their full potential in both educational and</p>	170

	<p>extracurricular settings. Removing the regulatory guidance runs counter to the intention of the law and will lead to a greater risk for survivors. Additionally, removal of the Title IX implementation guidance denies both survivors and accused perpetrators the rigorous adjudication process students deserve.</p> <p>JWI provides critically important proactive, prevention programming on college campuses, teaching students about sexual assault, dating abuse, and bystander intervention. Through our multi-faceted holistic program, Change the Culture, we hear from scores of students who want more prevention education. A revocation of Title IX guidance will make it challenging to provide this information to students and create the cultural changes needed on campuses.</p> <p>Every student deserves equal protection under the law. Strong enforcement of Title II, VI and IX from the Department of Education is essential. JWI calls on the Department of Education to protect the civil rights of students and maintain all existing guidance and regulations</p>	
https://www.regulations.gov/contentStreamer?documentId=ED-2017-OS-0074-14751&attachmentNumber=1&contentType=pdf	See attached file(s)	204
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https://www.regulations.gov/contentStreamer?documentId=ED-2017-OS-0074-14241&attachmentNumber=1&contentType=pdf	See attached file(s)	243
https://www.regulations.gov/contentStreamer?documentId=ED-2017-OS-0074-15260&attachmentNumber=1&contentType=pdf	Please see attached comment.	172
https://www.regulations.gov/contentStreamer?documentId=ED-2017-OS-0074-12629&attachmentNumber=1&contentType=pdf	<p>To The Department of Education,</p> <p>I am writing to comment on the Evaluation of Existing Regulations ID: ED-2017-OS-0074-0001. The Guidance on Dyslexia should be kept intact as it provides a framework for schools to follow and clarifies that the term Dyslexia can indeed be used on any special education document. Any modification should be completed with input from stakeholders such as Parents, Families, and Decoding Dyslexia.</p> <p>Even with Federal guidance, there is still much confusion within school districts in our state, especially regarding the term Dyslexia. The Essential Components of Reading instruction as indicated in IDEA are not being applied consistently.</p>	387

	http://idea.ed.gov/explore/view/p/,root,regs,preamble2,prepart2,D,2002,.html Thank you J Kelly	
https://www.regulations.gov/contentStreamer?documentId=ED-2017-OS-0074-15710&attachmentNumber=1&contentType=msw12	See attached file(s)	95
https://www.regulations.gov/contentStreamer?documentId=ED-2017-OS-0074-14034&attachmentNumber=1&contentType=pdf	<p>Dear Assistant General Counsel Hilary Malawer:</p> <p>Safe Berks provides a safe haven and ongoing support system for victims of domestic violence and sexual assault. Our advocacy and education programs increase awareness and promote the prevention of domestic violence, sexual assault and all forms of oppression.</p> <p>Safe Berks wishes to submit comments on the following guidance documents under current review by the U.S. Department of Education:</p> <ol style="list-style-type: none"> 1)April 4, 2011 "Dear Colleague" letter; 2)"Know Your Rights: Title IX Requires Your School to Address Sexual Violence*" handout; 3)"Building Partnerships with Local Rape Crisis Centers: Developing a Memorandum of Understanding;" 4)"Not Alone: The First Report of the White House Task Force to Protect Students From Sexual Assault, April 2014;" 5)"Questions and Answers on Title IX and Sexual Violence;" and 6)2016 "Dear Colleague" Letter on Transgender Students. <p>Title IX protects the entire campus communityacross gender identitiesand ensures that schools are equipped to both prevent and remedy gender-based discrimination. Safe Berks opposes any scaling back or dilution of the Department of Education and Department of Justice guidance.</p> <p>Please see our attached letter for our full comment. We oppose any rescission of current Title IX guidance and have outlined our reasons in the attached documents.</p> <p>Mary Kay Bernosky, CEO & Carmen J. Bloom White, Esq.</p>	266
https://www.regulations.gov/contentStreamer?documentId=ED-2017-OS-0074-13851&attachmentNumber=1&contentType=pdf	See attached file(s)	295
https://www.regulations.gov/contentStreamer?documentId=ED-2017-OS-0074-13851&attachmentNumber=1&contentType=pdf	Comments submitted on behalf of the American Speech-Language-Hearing Association.	432

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https://www.regulations.gov/contentStreamer?documentId=ED-2017-OS-0074-13809&attachmentNumber=1&contentType=pdf	See attached file(s)	311
https://www.regulations.gov/contentStreamer?documentId=ED-2017-OS-0074-12207&attachmentNumber=1&contentType=jpeg	<p>I am the mother of a 25 year old man with autism and intellectual disabilities. As my son went through school, I was grateful there were laws protecting his right to learn academically, socially and behaviorally. As a single mother, my goals for my children were for them to learn as much as they can, live as independently as they can, and get a job and pay as much taxes as they can. I did not ask to give birth to a child with a severe disability. He is here though, and looks to me for love and protection. So I will. My son was put on this earth to do great things. Don't second guess his importance and validity.</p> <p>I've worked for a non profit parent advocacy group for 17 years and talked with thousands of parents who think just like me. We love our children, and want the best for them. We know how tough it can be, and expect highly qualified professionals to work as hard as our kids do. My family has had fabulous supports and services, but that quality has been dwindling, and these cuts would devastate our ability to maximize our childrens potential and progress.</p> <p>As a citizen I firmly stand behind the laws listed below and their federal implementing regulations and non-regulatory guidance, which are essential to ensuring states and school districts fulfill their obligations to students with disabilities and their families. I urge you not to modify or rescind any.</p> <p>Civil Rights Act of 1964 Every Student Succeeds Act (ESSA) Section 504 of the Rehabilitation Act of 1973 (Individuals with Disabilities Education Act (IDEA) Higher Education Act; Americans with Disabilities Act (ADA); and Workforce Innovation and Opportunity Act (WIOA) amending Title I of the Rehabilitation Act of 1973.</p> <p>These laws are about equality, acceptance and love. We need to remember that we are a country by, for and of the PEOPLE. Children, adolescents and adults with disabilities are people. Please remember that. We love them. Remember that.</p>	406
https://www.regulations.gov/contentStreamer?documentId=ED-2017-OS-0074-15538&attachmentNumber=1&contentType=jpeg	My daughter was born with hydrocephalus via c section at 37 weeks, had brain surgery to insert a shunt at 6 days old. We began occupational therapy with Easter Seals around 2 months old when her pediatrician noticed that she still tucked her left thumb. Around 8 months, we began physical therapy when she was still having issues beginning to crawl and bear weight. At a year old, her therapist prescribed orthotics for her feet, which were pronated. She's now 19 months old, and nearly walking! She wouldn't be anywhere close without the therapy. Her occupational therapist is also beyond amazing, she's assisting my daughter overcome the nerve damage that has weakened her left hand. With Easter Seals, my daughter has the chance to overcome her disabilities.	130
https://www.regulations.gov/contentStreamer?documentId=ED-2017-OS-0074-15538&attachmentNumber=1&contentType=jpeg	Recommendation: Permit services that support Pre-ETS as qualifying for use of set-aside Pre-ETS	85

umentId=ED-2017-OS-0074-15765&attachmentNumber=1&contentType=pdf	<p>funding.</p> <p>Specifically, modify guidance to permit States to pay for transportation costs incurred as a result of students' participation in Pre-ETS. Amend 29 U.S.C. Section 730(d)(1) of WIOA to exclude students' transportation or travel costs from administrative costs. And, amend the definition of administrative costs in 34 C.F.R. 361.5(c)(2) to exclude students' transportation and travel costs for customers.</p> <p>Specifically, modify guidance to allow States to pay for technology needed for students' education, skill development, and participation in Pre-ETS under "authorized activities," as defined in under 34 C.F.R. 361.48(a)(3)(i) and 34 C.F.R. 361.48(a)(3)(ii).</p> <p>Specifically, modify guidance to include coaching supports when necessary to support work-based learning experiences.</p> <p>Overall, the regulations on Pre-ETS should give states considerably more flexibility in determining a broader range of services that could potentially enhance a student's career development. The lack of flexibility inhibits the SVRAs' capacity to fully engage students in the required Pre-ETS on a scale necessary to expend the full amount of the Pre-ETS reserved funds. This may potentially limit the success of the Pre-ETS implementation.</p> <p>Recommendations: Amend 34 C.F.R. 397 to allow individuals of any age to make informed choice for subminimum wage employment and to opt out of the follow-up and follow-along services. Allowing individuals to opt out of such services would not only honor their choice, but would allow VR agencies and staff to expend the resources on services that individuals with disabilities are choosing to receive to seek and maintain employment.</p> <p>Recommendation: RSA amend the following data elements in the most recent RSA-911 case services reporting manual as follows:</p> <ol style="list-style-type: none"> 1.The extent, detail and frequency of the new data elements and collection are time-consuming and can possibly limit the time that SVRA staff engage with participants. It potentially inhibits establishing the counseling relationship necessary for engaging in the VR process. 2.Strike or reduce Section XVIII: Eliminate or simplify the Post-Exit Data Elements from the RSA-911 reporting requirements. 3.Allow all individuals to choose not to self-identify their race and strike instructions mandating staff to identify race. 4.Reassess and potentially remove data elements 64, 67, 69, 70, and 71. <p>See attached file for more information, Thank you for the opportunity to provide comment.</p>	
https://www.regulations.gov/contentStreamer?documentId=ED-2017-OS-0074-15347&attachmentNumber=1&contentType=pdf	<p>Attached are comments submitted by the Council for American Private Education (CAPE).</p>	<p>161</p>
https://www.regulations.gov/contentStreamer?documentId=ED-2017-OS-0074-14599&attachmentNumber=1&contentType=jpeg	<p>See attached file(s)</p>	<p>219</p>
https://www.regulations.gov/contentStreamer?documentId=ED-	<p>I am asking For the Department of Education to rescind the Dear Colleague Letter and it guidance on Sexual Violence. We need a process that is fair and equal for All. Colleges do not allow all due process rights for those accused and the Preponderance of Evidence standard is too low. I have a vested interest as a woman and as a mother of a daughter who is about to leave for college to</p>	<p>445</p>

2017-OS-0074-10555&attachmentNumber=3&contenttype=msw12	<p>believe victim's/survivors and to see those who have assaulted women brought to justice. This is a role I am a part of every day in my jobs as an emergency room nurse and as a nurse at a college, however I have also seen the other side. I have two sons one who was wrongly accused and who went through a process that was anything but fair, unbiased, equitable, that upheld due process, or allowed for the right to be heard.</p> <p>Believe the victim no matter what, leaves the accused defending him self as guilty until proven innocent. I thought it was our constitutional right to be innocent until proven guilty. This is not true on a college campus and until this happens to you most people have a hard time believing this. I am attaching my son's story showing the bias and inequities in the system and how my son was treated along with a copy of my son's student rights at his college.</p> <p>Trauma Informed Prevention is the "Public Health Perspective" that has taken hold over the last eight years. This thought process is pervasive throughout the CDC and the DOJ. Many of these studies seem to have been funded through the VAWA. A Trauma Informed Approach according to the Director of Community Living on our campus states; "It guides us to approach all students as though they have experienced abuse, regardless of whether they have or not." I feel like I need to repeat that. Treat the student as though they have been assaulted even if they have not. It only matters that they believe they were assaulted. Is it not important to look at both sides? Title IX is about fair and equal treatment. Why are we not using more evidenced based studies like the Rape and Sexual Assault Victimization Among College-Age Females, 1995-2013.</p> <p>A Highlight of Activities report for the OCR 2009-2016 was recently released. It states there was a 1,170% increase in the number of Sexual Violence related complaints from 2009 to 2016. The Obama administration has focused on prevention of sexual assault and violence. How is this huge increase in "sexual violence" considered an accomplishment? How are we helping the "victims"? It seems that the problem is expanding. I know the colleges are proud of their increased numbers stating people feel comfortable now to report their assault. It seems more believable that the number of assaults is increased because of the expanded definitions of the words "sexual assault and "rape"?" The CDC states, "Sexual violence includes a continuum of behaviors such as attempted or completed rape, sexual coercion, unwanted contact, and non-contact unwanted experiences like harassment." Including "non-contact unwanted experiences like harassment" certainly increases the numbers. Add to this the preponderance of evidence standard and our sons are much more likely to be found guilty! Is it ok with you that a young man found responsible for a non-contact experience potentially will suffer life long effects with his career or worse? Think of the stigma of being labeled a sex offender it is embarrassing, humiliating, it is an emotional scar that does not go away. Depression, suicide and PTSD are common. Your life is sidelined for months to even years with this process and they cannot return what was taken away even if the final verdict is not guilty. This is a life-changing event with a life sentence.</p> <p>The college has pressure to meet statistics so that they can continue to receive Federal Grant money. How does this make the college fair and impartial? We need to remove the potential bias of college administrators/faculty/students who sit on these hearing panels and could be pressured into making the best decision for the college and ultimately their own jobs.</p> <p>The fact is believe the victim at all costs, combined with the inflated definitions of the words "rape" and "sexual assault", throw in affirmative consent and preponderance of evidence standard without providing all due process rights and yes we have a kangaroo court. Title IX should not be in the business of deciding a young mans future. Please repeal the DCL! We need to return these investigations to trained professionals in the criminal justice system! Rape or Sexual assault is a serious crime! Why are we letting college professors/administrators or students determine these outcomes? I ask where is the common sense in this? The current system is not fair to the victims or to the accused. Please repeal the DCL and it current guidance!</p>	
https://www.regulations.gov/contentStreamer?documentId=ED-2017-OS-0074-10558&attachmentNumber=1&contenttype=pdf	<p>Hello,</p> <p>I would like to request a modification of the regulations to include Intervener Services on the list of Related Services. We our raising our deafblind granddaughter and had no idea how hard it would be to get the services and help she would need at school. Because deafblindness is such low incidence, there has been little help for her. Just as a deaf child needs the services of an interpreter to help guide them, a deafblind child needs an intervener. Imagine when you can't see or hear, your problems are magnified so much more. By having an intervener at her side, the intervener brings</p>	<p>442</p>

	<p>the world to her. The intervener helps the student gather information, learn concepts and skills, develop communication and language, and establish relationships that lead to independence.</p> <p>The use of interveners in educational settings continues to increase across the country. Please help make it possible for all deafblind children to receive these services. You can make a difference for our children to get the services they need across the board. An intervener can facilitate access to visual and auditory information, communication and interaction in the child's mode of communication and instruction needed to learn and make meaningful educational progress.</p> <p>Again, please help us by including interveners on the list of Related Services for all deafblind children.</p> <p>Thank you for your help.</p> <p>Jay Bidwell</p>	
https://www.regulations.gov/contentStreamer?documentId=ED-2017-OS-0074-15702&attachmentNumber=1&contentType=pdf	<p>These are proposed modifications to the State Facility Incentive Grant.</p> <p>The recommended enhancements focus on two themes.</p> <p>First, the awards should also be eligible to Charter Support Organizations and Nonprofits working with State Education Agencies. As the Department has found in the SEA grant, often times SEA charter school offices are not equipped to manage grant programs. SEAs, especially smaller ones, can partner with Nonprofits and CSOs to more effectively and more efficiently manage these types of awards.</p> <p>Second, the facility aid is prescribed to be a per-pupil funding model. This was the most reasonable option when the program was created. Since then, states have come up with other creative facility aid programs that should be incentivized. These range from providing the states' moral obligation to charter school financing to giving charter schools first right to acquire empty school buildings (or lease them for \$1/year). States may come up with other creative facility aid solutions that are outside of the original prescribed method. This approach would be consistent with the Department's shift toward giving states more autonomy in defining how they can provide solutions to some of the intractable problems in education.</p> <p>Both of these shifts can be accomplished with minor word changes to the program description in the Federal Register. Please see the attached file for suggestions.</p> <p>Thank you for your consideration,</p>	96
https://www.regulations.gov/contentStreamer?documentId=ED-2017-OS-0074-14368&attachmentNumber=1&contentType=pdf	<p>See attached file(s)</p>	233
https://www.regulations.gov/contentStreamer?documentId=ED-2017-OS-0074-15438&attachmentNumber=1&contentType=pdf	<p>Hilary Malawer Assistant General Counsel, Office of the General Counsel U.S. Department of Education 400 Maryland Avenue SW Rm 6E231 Washington, DC 20202</p> <p>RE: June 22, 2017 Request for Comments on the Evaluation of Existing Regulations Docket ID: ED2017-OS-0074</p> <p>Dear Ms. Malawer:</p> <p>Franklin University is a private nonprofit institution of higher education founded in 1902 in</p>	144

	<p>partnership with the YMCA to serve the needs of working adults. Students can complete undergraduate and graduate degrees face-to-face on Franklin's main campus in Columbus, Ohio, at multiple co-locations in the Midwest, and online.</p> <p>We appreciate the opportunity to provide input and inform the Regulatory Reform Task Forces evaluation of existing regulations and guidance. Please see the attached file for our specific comments related to existing regulations that we recommend be removed or that would benefit from clarification.</p> <p>Sincerely,</p> <p>The Accreditation Team of Franklin University: Dr. Pamela Shay, SVP of Accreditation & Institutional Effectiveness Danielle Buckius, Executive Director of Accreditation & Institutional Effectiveness Kate Grimes, Director of Academic Compliance Heather Jenkins, Accreditation Coordinator</p>	
https://www.regulations.gov/contentStreamer?documentId=ED-2017-OS-0074-12716&attachmentNumber=1&contentType=pdf	See attached file(s)	381
https://www.regulations.gov/contentStreamer?documentId=ED-2017-OS-0074-14137&attachmentNumber=1&contentType=pdf	<p>Dear Department of Education, From my family's own personal experience and those of close friends of ours, I submit to you my full support of the letter attached by Denise Marshall, Executive Director, COPAA to Ms. Hilary Malawer, Assistant General Counsel, Office of the General Counsel</p> <p>U.S. Department of Education dated August 18, 2017, RE: Docket ID: ED2017OS0074: Evaluation of Existing Regulations.</p> <p>I urge you to implement their recommendations in the best interest of the education of all of our children in the U.S.A. and the future of our country.</p> <p>Sincerely, Carol Richards (Mom)</p>	256
https://www.regulations.gov/contentStreamer?documentId=ED-2017-OS-0074-15473&attachmentNumber=1&contentType=msw12	See attached file(s)	142
https://www.regulations.gov/contentStreamer?documentId=ED-2017-OS-0074-14653&attachmentNumber=1&contentType=pdf	Please see attached file for comments.	214
https://www.regulations.gov/contentStreamer?documentId=ED-2017-OS-0074-14653&attachmentNumber=1&contentType=pdf	<p>The National Law Center on Homelessness & Poverty ("Law Center") is submitting a letter to the U.S. Department of Education ("ED") in response to ED's request for public comment on Executive Orders 13771 and 13777 to identify regulations that may be "outdated, ineffective, or excessively burdensome" or "impose costs that exceed benefits."</p>	367

2017-OS-0074-13027&attachmentNumber=1&contentType=pdf	<p>The letter urges ED to preserve regulations that benefit low-income and homeless children, youth and families. These regulations advance policy goals of providing equal access to free public education and removing educational barriers to the homeless children and youth. The federal government would not gain any visible cost savings through repealing, replacing, or modifying these regulations. Instead, it may create additional barriers to the education of homeless children and youth. Moreover, these regulations support McKinney-Vento and are crucial to providing necessary services to ensure stable and continuous education for homeless children and youth. If implemented indiscriminately, Executive Orders 13771 and 13777 would threaten ED's ability to fulfill its purpose of promoting student achievement and ensuring equal access to education.</p>	
https://www.regulations.gov/contentStreamer?documentId=ED-2017-OS-0074-13382&attachmentNumber=1&contentType=pdf	<p>See attached file.</p>	<p>339</p>
https://www.regulations.gov/contentStreamer?documentId=ED-2017-OS-0074-13417&attachmentNumber=1&contentType=msw12	<p>Please see attached file(s).</p>	<p>333</p>
https://www.regulations.gov/contentStreamer?documentId=ED-2017-OS-0074-14042&attachmentNumber=1&contentType=pdf	<p>To:</p>	<p>264</p>
https://www.regulations.gov/contentStreamer?documentId=ED-2017-OS-0074-13961&attachmentNumber=1&contentType=pdf	<p>These 91 constituents representing Connecticut join with the American Association of University Women (AAUW) in urging the U.S. Department of Education to protect Title IX, preserve all of its current regulations and guidance, and fully enforce the law.</p> <p>Title IX of the Education Amendments of 1972 is the federal law that prohibits sex discrimination in education. This vital law affects all areas of education. It requires recipients of federal education funding to evaluate their current policies and practices, adopt and publish a policy against sex discrimination, and implement grievance procedures providing for prompt and equitable resolution of student and employee discrimination complaints.</p> <p>Unfortunately, many students still do not have access to an equitable education free from sex discrimination. As Secretary of Education, you have the power to address this critical civil rights issue and help make schools safer and more equitable for all students. These 91 individuals join with AAUW in urging the U.S. Department of Education to keep in place current Title IX guidance and regulations and fully enforce the law.</p>	<p>271</p>
https://www.regulations.gov/contentStreamer?documentId=ED-2017-OS-0074-15230&attachment	<p>Docket ID: ED-2017-OS-0074</p> <p>The Dear Colleague Letter and Resource Guide on ADHD</p> <p>This link to where the guidance can be found on the website of the U.S. Department of Education: https://www2.ed.gov/about/offices/list/ocr/letters/colleague-201607-504-adhd.pdf</p>	<p>176</p>

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https://www.regulations.gov/contentStreamer?documentId=ED-2017-OS-0074-13817&attachmentNumber=1&contentType=msw12	<p>Please see attached.</p> <p>Sincerely,</p> <p>Rebekah Gleason Hope, Esq. Gleason Hope Law, P.A. 2029 Jacksonville Beach, FL 32250</p>	305
https://www.regulations.gov/contentStreamer?documentId=ED-2017-OS-0074-14741&attachmentNumber=1&contentType=pdf	Attached please find a comment submitted on behalf of the Board of Directors and Members of the International Education Council.	207
https://www.regulations.gov/contentStreamer?documentId=ED-2017-OS-0074-13818&attachmentNumber=1&contentType=pdf	See attachment	304
https://www.regulations.gov/contentStreamer?documentId=ED-2017-OS-0074-15757&attachmentNumber=1&contentType=msw12	<p>See attached file titled - RSA Deregulation Recommendations - PA OVR (9-20-17) for Docket ID (ED-2017-OS-0074-0001)</p> <p>Respectfully submitted by David DeNotaris, PA OVR Executive Director ddenotaris@pa.gov</p>	89
https://www.regulations.gov/contentStreamer?documentId=ED-2017-OS-0074-9813&attachmentNumber=1&contentType=pdf	<p>CITATION: CFR Title 34, Subtitle III, Chapter III, Part 300, Subpart A, 300.34 Related Services</p> <p>REQUEST: I request a modification of the regulations to include Intervener Services on the list of Related Services per the attached document (Regulations-Requests-2017-003-002).</p> <p>RATIONALE: Deafblindness means concomitant hearing and visual impairments, the combination of which causes such severe communication and other developmental and educational needs that they cannot be accommodated in special education programs solely for children with deafness or children with blindness (34 CFR 300.8 (c) (2)). An intervener is someone who has gone through specialized training in deafblindness to work one-on-one with a person who is deafblind. General educational assistants, even knowing American Sign Language or supports for visual impairments, do not have the level of training/education to properly support a child with deafblindness. As a parent, I do not have all the supporting facts readily available, but there are several organizations that have proven the value of interveners as a related service and are helping to standardize their training and qualifications such as National Center on Deaf-Blindness and the Minnesota DeafBlind Project (see A-Familys-Guide-to-Interveners for more information about interveners). In following E.O. 13777, I will attempt to address the issues raised with modifying this regulation.</p> <p>(i) Eliminate jobs, or inhibit job creation; No, it should not eliminate jobs but rather provide support for specifically trained personnel in the school system.</p> <p>(ii) Are outdated, unnecessary, or ineffective; No, interveners have been shown to be highly effective related service for individuals with deafblindness.</p> <p>(iii) Impose costs that exceed benefits; I do not have hard data on this, but I believe most children</p>	474

	<p>with deafblindness already receive one-on-one support, just not necessarily from a trained intervener. The National Center on Deaf-Blindness does have Online Web Access modules for people to receive free intervener education and has developed a national certification process for interveners. Having specially trained personnel provide support with individuals with deafblindness should result in better outcomes that will reduce total costs in the long run.</p> <p>(iv) Create a serious inconsistency or otherwise interfere with regulatory reform initiatives and policies; No, just as interpreters are a recognized related service for children with deafness, an intervener should be a related service for those that are deafblind.</p> <p>(v) Are inconsistent with the requirements of section 515 of the Treasury and General Government Appropriations Act, 2001 (44 U.S.C. 3516 note), or the guidance issued pursuant to that provision, in particular those regulations that rely in whole or in part on data, information, or methods that are not publicly available or that are insufficiently transparent to meet the standard for reproducibility; or Not sure exactly, but the rationale to include interveners and data to support it should be publicly available, since most support comes from the National Center on Deaf-Blindness.</p> <p>(vi) Derive from or implement Executive Orders or other Presidential directives that have been subsequently rescinded or substantially modified." Not applicable.</p> <p>Bottom Line: I am a parent of a child with CHARGE Syndrome, which is the leading cause of deaf-blindness. My daughter that is deafblind has received intervener services from her school for the past two years through her IEP and it has been a critical support for the academic progress she has made. This past year, her intervener facilitated our daughter's access to information which has greatly increased her desire to read and explore her world, including developmentally appropriate socialization with her peers. From this experience, we can look back when our daughter only had a special education one-on-one and some of the ways that person unintentionally inhibited her progress, simply because she did not have specialized training. For example, that person was a fluent signer but was not always signing within our daughter's communication bubble (i.e. outside her visual field) so our daughter simply didn't know she was being communicated with. This aide was a wonderful person but didn't have the education to communicate effectively or give our daughter access to information and her environment. This is why specially trained people called interveners are so important as a related service in IEPs for children that are deafblind. Thank you for your consideration.</p>	
https://www.regulations.gov/contentStreamer?documentId=ED-2017-OS-0074-14190&attachmentNumber=2&contentType=pdf	<p>I'm submitting comments in two major areas first: Evaluation of Existing Regulations and the second: including and correcting correcting misconceptions about the use of the terms dyslexia, dysgraphia, and dyscalculia.</p> <p>1. RE: Docket ID: ED-2017-OS-0074: Evaluation of Existing Regulations I am writing in response to the ED request for public comment on regulations that may be appropriate for repeal, replacement, or modification as directed by Executive Order 13777 and as part of the "Enforcing the Regulatory Reform Agenda". Any regulation, guidance, technical assistance and/or other administrative activity must be whether [the regulation/guidance] advances educational equity and serves the interests of all students. I agree with COPAA, attached letter, dated August 18, 2017, (found at https://c.ymcdn.com/sites/copaa.site-ym.com/resource/collection/FB227BDB-B917-408A-9993-E58A6F069478/COPAA_on_ED_reg_review_final.pdf) that shows that the ED's narrow slant and sole focus in this regulatory review tilts toward reducing burden on "entities significantly affected by Federal regulations" while completely disregarding the most important entity served by our nation's education laws - students.</p> <p>2. This letter serves an important purpose in correcting misconceptions about the use of the terms dyslexia, dysgraphia, and dyscalculia. There is still misinformation surrounding the use of these terms. Please do not eliminate this important guidance. Im requesting that the Dear Colleague Letter: "Dyslexia Guidance dated October 23, 2015 (found at https://www2.ed.gov/policy/speced/guid/idea/memosdcltrs/guidance-on-dyslexia-10-2015.pdf) be retained as active guidance. See attached file(s)</p>	<p>246</p>

Dear Assistant General Counsel Hilary Malawer:

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I am submitting comment on the proposed evaluation of the Department of Education (DEd)'s existing regulations, particularly those related to the implementation of the Workforce Innovation and Opportunities Act (WIOA), dates August 19, 2016. We understand that comments are being received as it relates to repealing, adjusting and/or changing the rulemaking related to the Javits Wagner O'Day Act under what is known as AbilityOne, and the treatment of those opportunities as not "competitive and integrated" for the purposes of WIOA. Our comments support maintaining the current regulations as they exist, in particular, as they relate to the treatment of AbilityOne programs as being defined as not "competitive and integrated" for the purposes of WIOA.

AbilityOne, the brand name for the implementation of the Javits Wagner O'Day Act (JWOD), passed in 1938, and refreshed in 1971, is charged with providing training and employment opportunities to people who are blind or severely disabled. The program effectively merged (as was the purpose of such Vocational Rehabilitation (VR) programs) the training with employment for people with disabilities. The passage of WIOA and subsequent rulemaking provided an opportunity to bifurcate the two functions, particularly for those providing employment and training to people with disabilities.

It is my contention that the WIOA rulemaking as it relates to sheltered workshops, of which JWOD is, marks the culmination of a long progression of civil rights development to shift from segregation of people with disabilities in the employment realm. WIOA will ensure that a managerial shift of those organizations currently operating under JWOD will have to synthesize with the new regulations and will simply be formalizing what is already occurring in the disability employment and training community. Moreover, many advocates for people with disabilities see sheltered workshops as limiting for those who are employed in them, particularly where direct labor requirements are employed.

AbilityOne nonprofits are one of the largest employers of people with disabilities in the nation, and the federal government's paradoxical position on the matter is one which must be reconciled. However, such a reconciliation is for participants in the program to synthesize, and options are available AbilityOne nonprofits to become Competitive and Integrated under the WIOA law. A solution has been presented to Congress and the Section 809 panel in the form of a White Paper (attached below). Fundamentally, the DEd got the regulations correct. Pushing AbilityOne to have to adjust to the modern work environment, and examining how JWOD fits the modern economy, is an essential part of the regulations. The intent is to mainstream Competitive and Integrated opportunities and I strongly believe the WIOA regulations are the right direction to meet that objective. Alternatively, maintaining the

	<p>status quo will be a huge step back from the Competitive and Integrated push for people with disabilities. Please see the attached White Paper for further detail on the role WIOA and JWOD could play with ensuring Competitive and Integrated opportunities for those with disabilities.</p>	
https://www.regulations.gov/contentStreamer?documentId=ED-2017-OS-0074-14680&attachmentNumber=1&contentType=msw12	<p>To: Hilary Malawer, Assistant General Counsel, Office of the General Counsel U.S. Department of Education 400 Maryland Avenue SW., Room 6E231 Washington, DC 20202</p> <p>RE: Docket ID: ED2017OS0074: Evaluation of Existing Regulations</p> <p>Dear Ms. Malawer:</p> <p>I am writing in response to the U.S. Department of Education's (ED) request for public comment on regulations that may be appropriate for repeal, replacement, or modification as directed by Executive Order 13777 and as part of the Enforcing the Regulatory Reform Agenda led by the Administration.</p>	210
https://www.regulations.gov/contentStreamer?documentId=ED-2017-OS-0074-12560&attachmentNumber=1&contentType=msw12	<p>See attached file.</p>	397
https://www.regulations.gov/contentStreamer?documentId=ED-2017-OS-0074-15360&attachmentNumber=1&contentType=pdf	<p>Please see attached PDF.</p>	157
https://www.regulations.gov/contentStreamer?documentId=ED-2017-OS-0074-14178&attachmentNumber=1&contentType=pdf	<p>These 299 constituents representing New York join with the American Association of University Women (AAUW) in urging the U.S. Department of Education to protect Title IX, preserve all of its current regulations and guidance, and fully enforce the law.</p> <p>Title IX of the Education Amendments of 1972 is the federal law that prohibits sex discrimination in education. This vital law affects all areas of education. It requires recipients of federal education funding to evaluate their current policies and practices, adopt and publish a policy against sex discrimination, and implement grievance procedures providing for prompt and equitable resolution of student and employee discrimination complaints.</p> <p>Unfortunately, many students still do not have access to an equitable education free from sex discrimination. As Secretary of Education, you have the power to address this critical civil rights issue and help make schools safer and more equitable for all students. These 299 individuals join with AAUW in urging the U.S. Department of Education to keep in place current Title IX guidance and regulations and fully enforce the law.</p>	247
https://www.regulations.gov/contentStreamer?documentId=ED-2017-OS-0074-	<p>Please see the attached letter.</p>	301

13822&attachmentNumber=1&contentType=pdf		
https://www.regulations.gov/contentStreamer?documentId=ED-2017-OS-0074-15658&attachmentNumber=1&contentType=pdf	See attached file(s)	107
https://www.regulations.gov/contentStreamer?documentId=ED-2017-OS-0074-15758&attachmentNumber=1&contentType=pdf	See attached file(s)	88
https://www.regulations.gov/contentStreamer?documentId=ED-2017-OS-0074-16258&attachmentNumber=1&contentType=pdf	<p>Having spent the last year and a half as the President of Students Advocating for Students - a national, non-profit, 501(c)(3) organization dedicated to educating college students about their civil liberties - I have become extremely familiar with many of the Department of Education's (DOE) rules, regulations, and policies. This comment is intended to address one of the most needed alterations that any DOE reform agenda should undertake: ending Title IX's disparate impact on college students with invisible disabilities.</p> <p>The term invisible disabilities is a colloquial term in the disability field used to describe disabilities stemming from an intellectual or mental health issue such as ADD, AD/HD, Asperger's, autism, anxiety disorder, bipolar disorder, or a processing disorder. Due to the wording of current guidance from the Department of Education's Office for Civil Rights (OCR), students with invisible disabilities are not receiving resources and supports specific to their unique needs during Title IX proceedings, which is in stark contrast to other groups.</p> <p>Attached to this comment are two documents. The first attachment is a White Paper, written by Lori Tucker, Esq. and myself, detailing how this community of students is being harmed by current OCR policy and how the proposed Regulatory Reform Task Force can proceed in remedying the identified problems. The second attachment is a list of names supporting the ideas put forth in this comment and the White Paper.</p>	20
https://www.regulations.gov/contentStreamer?documentId=ED-2017-OS-0074-11173&attachmentNumber=1&contentType=msw12	Please see the attached document.	429
https://www.regulations.gov/contentStreamer?documentId=ED-2017-OS-0074-15116&attachmentNumber=1&contentType=png	I believe that removing this 'unnecessary' document is a big mistake in the future children of the U.S.'s education. Both my brother and I have ADHD and this guide is helping us from where we used to struggle. That is why I believe you should keep this guideline for education of people with ADHD.	184

https://www.regulations.gov/contentStreamer?documentId=ED-2017-OS-0074-12455&attachmentNumber=1&contentType=pdf	See attached file(s)	400
https://www.regulations.gov/contentStreamer?documentId=ED-2017-OS-0074-12923&attachmentNumber=1&contentType=msw12	See attached file(s)	374
https://www.regulations.gov/contentStreamer?documentId=ED-2017-OS-0074-13381&attachmentNumber=1&contentType=msw12	See attached file(s)	340
https://www.regulations.gov/contentStreamer?documentId=ED-2017-OS-0074-14604&attachmentNumber=1&contentType=pdf	See attached file(s)	218
https://www.regulations.gov/contentStreamer?documentId=ED-2017-OS-0074-9329&attachmentNumber=1&contentType=pdf	<p>August 10, 2017</p> <p>Ms. Hilary Malawer Assistant General Counsel, Office of the General Counsel U.S. Department of Education 400 Maryland Ave SW, Room 6E231 Washington, DC 20202 Via electronic submission at http://www.regulations.gov Re: Docket ID: ED-2017-OS-0074</p> <p>Dear Ms. Malawer:</p> <p>CW Resources, Inc. has been providing employment, vocational training, and placement services to people with disabilities since 1964. Headquartered in New Britain, CT, we employ over 1,000 individuals with significant disabilities in meaningful and well-paying jobs throughout the country, many of whom are employed at military bases and prestigious government facilities as a direct result of the AbilityOne program.</p> <p>Our comment is in regards to regulations and sub-regulatory guidance issued by the U.S. Department of Education (DoEd), Rehabilitation Services Administration (RSA) for the purpose of implementing the integrated settings criteria under the definition of competitive integrated employment [34 CFR 361.5(c)(9)(ii) and 361.5(c)(32)(ii)] in the Workforce Innovation and</p>	508

	<p>Opportunity Act. These regulations and guidance are stripping away the rights of people with disabilities by closing off meaningful and well-paying jobs for people with significant disabilities. Specifically, RSAs guidance is indiscriminately disqualifying vocational rehabilitation job placements to certain nonprofit agencies (NPAs) based upon their participation in the congressionally-mandated U.S. AbilityOne Program.</p> <p>In the absence of the AbilityOne program, many of the individuals we serve would not be employed or would be working in lower paying positions with minimal to no benefits. The unemployment rate for people with disabilities continues to be high, despite good intentions and various policies designed to increase employment. Eliminating and limiting job opportunities for any group of people, specifically for people with significant disabilities is unfair and disheartening.</p> <p>The language in the integrated settings criteria promulgated by RSA not only restricts access to quality competitive integrated jobs for people with disabilities; it is inconsistent with other parts of the regulation, the departments longstanding practice and technical guidance. As an employer in a number of states, some of the vocational rehabilitation (VR) agencies are discounting any AbilityOne job which is problematic and can lead to unfilled positions.</p> <p>We respectfully request that the DoEd immediately rescind the FAQ guidance (posted on DoEds website, https://www2.ed.gov/about/offices/list/osers/rsa/wioa/competitive-integrated-employment-faq.html) related to the definition of integrated settings and issue clarifying guidance and that employment at community rehabilitation programs, including employment positions funded through the AbilityOne Program, may be considered competitive integrated employment as long as it meets the criteria defined in RSA-TAC-06-01 and the WIOA (P.L. 113-128). This is an Employment First approach which not only supports</p> <p>individual choice but will lead to the employment for many individuals with significant disabilities in the future.</p> <p>Thank you for the opportunity to comment on existing regulations that eliminate jobs, or inhibit job creation.</p> <p>Sincerely,</p> <p>Sandra M. Lavoy Sr. VP of Community Rehabilitation Services</p> <p>Singed copy of letter is uploaded as attachment</p>	
https://www.regulations.gov/contentStreamer?documentId=ED-2017-OS-0074-15478&attachmentNumber=1&contentType=pdf	Attached please find comments from Capella University.	141
https://www.regulations.gov/contentStreamer?documentId=ED-2017-OS-0074-14661&attachmentNumber=1&contentType=pdf	See attached file(s)	213
https://www.regulations.gov/contentStreamer?documentId=ED-2017-OS-0074-13938&attachment	The attached chart of comments are submitted on behalf of the Early Intervention (Part C) section in the Missouri Department of Elementary and Secondary Education.	282

ntNumber=1&contentType=msw12		
https://www.regulations.gov/contentStreamer?documentId=ED-2017-OS-0074-15932&attachmentNumber=1&contentType=pdf	<p>Docket ID: ED-2017-OS-0074 Federal Register Number: 2017-13157 Submitted: September 20, 2017</p> <p>Department of Education (DOE) Request for Public Comment: Enforcing the Regulatory Reform Agenda E.O. 13777</p> <p>Comments on Regulatory Reform from Jill R. Barker, Ann Arbor, Michigan,:</p> <p>With all the emphasis on children with disabilities being served in regular classrooms, usually referred to as Inclusion, there needs to be clarification that IDEA and its regulations assure all children with disabilities appropriate educational services and placements.</p> <p>I have two adult sons, 32 and 41 years old, who have profound intellectual and developmental disabilities. They both attended High Point School in Ann Arbor, a school that specialized in students with the most severe and complex disabilities in Washtenaw County. Regular classrooms were in no way appropriate for them, even with special supports and accommodations. At High Point, they experienced the best care and educational opportunities available in a loving and supportive community. I have no regrets, but I know the pressure has been on school systems for many years to eliminate schools like High Point in the name of an erroneous and misplaced desire for all students to be included.</p> <p>The following is an article I wrote for The DD News Blog in celebration of my son Dannys 40th birthday. It is just as relevant today as it was a year ago.</p>	<p>53</p>
https://www.regulations.gov/contentStreamer?documentId=ED-2017-OS-0074-12207&attachmentNumber=2&contentType=jpeg	<p>I am the mother of a 25 year old man with autism and intellectual disabilities. As my son went through school, I was grateful there were laws protecting his right to learn academically, socially and behaviorally. As a single mother, my goals for my children were for them to learn as much as they can, live as independently as they can, and get a job and pay as much taxes as they can. I did not ask to give birth to a child with a severe disability. He is here though, and looks to me for love and protection. So I will. My son was put on this earth to do great things. Don't second guess his importance and validity.</p> <p>I've worked for a non profit parent advocacy group for 17 years and talked with thousands of parents who think just like me. We love our children, and want the best for them. We know how tough it can be, and expect highly qualified professionals to work as hard as our kids do. My family has had fabulous supports and services, but that quality has been dwindling, and these cuts would devastate our ability to maximize our childrens potential and progress.</p> <p>As a citizen I firmly stand behind the laws listed below and their federal implementing regulations and non-regulatory guidance, which are essential to ensuring states and school districts fulfill their obligations to students with disabilities and their families. I urge you not to modify or rescind any.</p> <p>Civil Rights Act of 1964 Every Student Succeeds Act (ESSA) Section 504 of the Rehabilitation Act of 1973 (Individuals with Disabilities Education Act (IDEA) Higher Education Act; Americans with Disabilities Act (ADA); and Workforce Innovation and Opportunity Act (WIOA) amending Title I of the Rehabilitation Act of 1973.</p> <p>These laws are about equality, acceptance and love. We need to remember that we are a country</p>	<p>407</p>

	by, for and of the PEOPLE. Children, adolescents and adults with disabilities are people. Please remember that. We love them. Remember that.	
https://www.regulations.gov/contentStreamer?documentId=ED-2017-OS-0074-15317&attachmentNumber=1&contentType=pdf	<p>Via http://www.regulations.gov</p> <p>September 20, 2017</p> <p>Hilary Malawer Assistant General Counsel Office of the General Counsel U.S. Department of Education 400 Maryland Avenue SW Room 6E231 Washington, DC 20202</p> <p>Re: Request for Comments on Existing Dept. of Ed. Regulations and Guidance (in subtitles A and B of title 34 of the Code of Federal Regulations)</p> <p>Dear Ms. Malawer:</p> <p>Legal Aid at Work (formerly Legal Aid Society-Employment Law Center) submits the following comments on the Department of Education's Request for Comments on Existing Department of Education Regulations and Guidance (in subtitles A and B of title 34 of the Code of Federal Regulations ("CFR")).</p> <p>Legal Aid at Work is a 100 year old nonprofit providing free legal services across California and in other states to low-income individuals and their families who face unlawful discrimination and other injustices. We advance equality and access in the workplace, schools, and other community and public facilities, including through enforcement of Title IX. Fair Play for Girls in Sports, a project of Legal Aid at Work, has been dedicated for nearly 15 years to expanding the possibilities for girls and young women by enforcing Title IX in educational environments, specifically as to athletic programming.</p> <p>We daily work on matters to enforce Title IX's promise of equity, in particular focusing on girls in public schools in grades K-12 to ensure gender equality in education, specifically in schools' athletic programming. Girls who participate in sports experience better academic, health, and employment outcomes. Through the experience of our work and that of enforcing Title IX across the country alongside many other advocates we have seen Title IX's profound impact on girls' and women's athletic participation. Millions more female students are now able to participate in sports, and on a more "equal playing field," than before the law's passage the supporting regulations and guidance have been critical in achieving such progress.</p> <p>Within the Fair Play project we regularly rely and focus on the regulations pertaining to athletic equality, in particular Subtitle B Regulations of the Offices of the Department of Education, Chapter I Office for Civil Rights, Department of Education. Within Subtitle B, the regulations 106.1 to 106.71 are of key importance to enforcing Title IX to ensure nondiscrimination on the basis of sex in education programs or activities receiving federal financial assistance. Not only do educational institutions, students, and staff rely on the clear guidance of the regulations, many courts do as well. See e.g. <i>Mansourian v. Regents of Univ. of California</i>, 602 F.3d 957, 964 (9th Cir. 2010). We strongly recommend that the Department maintain the regulations and related guidance governing schools to ensure such educational institutions are gender equitable.</p> <p>In addition the aforementioned regulations, the Dear Colleague letters, 1979 Policy Interpretation, and the OCR Investigators' Manual pertaining to athletics are central to enforcement of Title IX. For example, the Policy Interpretation has been cited by 100 federal courts throughout the country. See e.g., <i>Ollier v. Sweetwater Union High Sch. Dist.</i>, 768 F.3d 843, 854 (9th Cir. 2014). Similarly, dozens of courts rely on the Investigator's Manual to appropriately navigate and apply Title IX's standards.</p>	163

	<p>See e.g., <i>Cohen v. Brown Univ.</i>, 809 F. Supp. 978, 984 (D.R.I. 1992), <i>aff'd</i>, 991 F.2d 888 (1st Cir. 1993). And the Dear Colleague Letters relating to athletics, as well as clarifications and other letters as to sports offerings in the educational context provide further guidance to the courts and public as to how Title IX must be applied to provide gender equitable athletic programming to girls and women. See e.g., <i>Biediger v. Quinnipiac Univ.</i>, 728 F. Supp. 2d 62, 92 (D. Conn. 2010), <i>aff'd</i>, 691 F.3d 85 (2d Cir. 2012).</p> <p>Thank you for taking into consideration our comments regarding the critical regulations and related materials promulgated by the Department of Education which serve as a lynchpin for ensuring schools, colleges, and universities adhere to Title IX's requirements. While unfortunately not all institutions are yet in compliance, the regulations and guidance are crucial to ongoing efforts to bring such institutions into the compliance fold to ensure girls and young women nationwide can learn and participate in educational-athletic activities critical to their lifelong wellbeing. We would be more than happy to discuss our comments further and/or answer any questions you may have. For additional information, please contact me at 415-864-8848.</p> <p>Sincerely,</p> <p>Kim Turner Senior Staff Attorney Fair Play for Girls in Sports Project / Gender & LGBT Rights Program Legal Aid at Work</p>	
https://www.regulations.gov/contentStreamer?documentId=ED-2017-OS-0074-14845&attachmentNumber=1&contentType=pdf	See attached file(s)	201
https://www.regulations.gov/contentStreamer?documentId=ED-2017-OS-0074-13109&attachmentNumber=1&contentType=pdf	See attached file(s)	357
https://www.regulations.gov/contentStreamer?documentId=ED-2017-OS-0074-13400&attachmentNumber=1&contentType=pdf	See attached file(s)	336
https://www.regulations.gov/contentStreamer?documentId=ED-2017-OS-0074-13843&attachmentNumber=1&contentType=msw12	See attached file(s)	299
https://www.regulations.gov/content	Please see the attached comment letter.	327

entStreamer?documentId=ED-2017-OS-0074-13443&attachmentNumber=1&contentType=pdf		
https://www.regulations.gov/contentStreamer?documentId=ED-2017-OS-0074-9306&attachmentNumber=1&contentType=pdf	CFR Title 34, Subtitle III, Chapter III, Part 300, Subpart A, 300.34 Related Services "I request a modification of the regulations to include Intervener Services on the list of Related Services". We have a son with a rare syndrome called Pallister Killian Syndrome. He is 1 of 2 in the state of MN to have this. Our son has severe medical issues along with deaf/blindness. We live in the greater Minnesota region, so we do not have access to some of the schools where they have supports for this type of student. We have spent the last 9 years trying to educate our schools on how they can help our son. We knew early on about Interveners and had them in our home setting where we witnessed their profound impact on communication and connecting with our son. They have helped us gain tools to connect with our son when we didn't think it was possible. This has been transformational in a very unique situation that empowered us as a family to do all we could to help him understand his world around him. It wasn't until we had gone to mediation with the school due to differences in what they thought our son needed in the education system, where they finally brought in some Deaf/Blind Professionals who helped point out where his education was lacking. Mostly it was communication. Our son was 11 years old at this point and still didn't have a formal communication plan in school. If you can only imagine not hearing, not seeing and not connecting with your world for 7 hours a day, 5 days a week with people who did not understand you. I beg of you to push for this wording. We are a very small group but our kids CAN learn. They deserve a voice and to be heard. They just need a different way of doing so. With this regulation added to the list of related services, our children will have a chance to a meaningful education. This will save so much unnecessary grief for both the family and school system, but mostly, it will provide the student with an education that is appropriate for their disability of access. Thank you for your time.	511
https://www.regulations.gov/contentStreamer?documentId=ED-2017-OS-0074-14363&attachmentNumber=1&contentType=pdf	Opportunities for Ohioans with Disabilities Response to U.S. Department of Education's Request for Regulatory Review Comments Comments are provided in the attached Word document.	235
https://www.regulations.gov/contentStreamer?documentId=ED-2017-OS-0074-11498&attachmentNumber=1&contentType=pdf	See attached file(s)	426
https://www.regulations.gov/contentStreamer?documentId=ED-2017-OS-0074-15804&attachmentNumber=1&contentType=pdf	Thank you for this opportunity to provide comments from the National College Access Network regarding the burden produced by the FAFSA verification process. Please see attached comments for details.	77
https://www.regulations.gov/contentStreamer?documentId=ED-2017-OS-0074-	See attached file(s)	36

16055&attachmentNumber=1&contentType=pdf		
https://www.regulations.gov/contentStreamer?documentId=ED-2017-OS-0074-10867&attachmentNumber=1&contentType=msw12	<p>Comments by Wallace State Community College (Hanceville, Oneonta, Ala.) Docket ID: ED-2017-OS-0074</p> <p>Wallace State Community College joins the American Association of Community Colleges in offering comments related to Executive Order 137777, "Enforcing the Regulatory Reform Agenda," which requests input on regulations that should be repealed, replaced or modified. We affirm the comments submitted by AACC and endorse the recommendations made in "Recalibrating Regulation of Colleges and Universities: Report of the Task Force on Federal Regulation of Higher Education," a bipartisan report by senators released in 2015. We urge the administration to use this report as its guide, and note the additional specific issues below.</p> <p>Integrated Postsecondary Education Data System (IPEDS), 34 CFR 668 The Human Resources metric has been particularly problematic as college employment numbers are requested for a time period over the course of the academic year rather than for a specific snapshot in time. This measure is next to impossible to report accurately. For instance, in a given year, a number of employees will retire, resign or be terminated. And many of these employees will be replaced through new hires. Are we to report two employees for one position because both served in the given time period -- the one who retired and the one who was hired? Or is the report really seeking to know how many unique job titles/positions were active during a given period? A better measure might be to request data for the number of employees on a given date in time, or an average number of employees over the course of the period.</p> <p>Secondly, in terms of student success, data are requested for the number of graduates or completers, and separately for the number students who have transferred. If a student has been reported in the graduate category, he or she cannot also be reported as having transferred. These categories, however, are not mutually exclusive in the reality of the student experience. Some students graduate and enter the workforce, others graduate and transfer, and still others transfer without graduating. As we have focused on completion, Wallace State's number of graduates has risen in the IPEDS cohort, to its most recent rate of 38 percent. However, while 25 percent of our students transfer, we are only able to report that 10 percent do, since 15 percent of those also graduated. This feels punitive, both to the college, which has a reputation as an outstanding place for students seeking academic-transfer opportunities, and to the students represented in these numbers, whose story is not accurately told. Many of our students graduate and transfer, and should be reported as such.</p> <p>Title IV - Student Loans, 34 CFR Parts 30, 668, 674, 682, and 685 The authorization of year-round Pell provides much-welcomed relief to community college students, especially those who are motivated to finish more quickly, and those enrolled in programs that require year-round attendance. The Pell funds awarded to students are rightly tied to the intensity of enrollment. A student enrolled part-time is awarded an amount of Pell proportional to that part-time status, so that students attending half time, are awarded half as much Pell as a student with the same level of eligibility attending full time. However, Title IV funds in the form of federal student loans have no such proportionality. We believe this puts undue risk both on the student, who will be required to repay the loan, and on the college, which is held accountable for repayment. The ability to rack up levels of debt disproportionate to the degree being pursued is not only more likely in the current scheme, but should the part-time student fail to complete, the loan repayments are also much higher than is necessary. The availability of such "easy money" teaches poor financial discipline and encourages over-borrowing for the degree.</p> <p>Gainful Employment, 34 CFR Parts 600 and 668 The intent of gainful employment data to provide a picture of the debt-to-earnings ratio for program is admirable. However, as AACC points out, no community college in the U.S. has failed the debt-to-earnings metric. Furthermore, many applied technology courses, which are hands-on in</p>	<p>435</p>

	<p>nature and typically have lower enrollments as a result, do not meet the minimum cohort numbers required for some of the questions on the survey. And those that do rely on instructors to track employment in field for graduates from several years prior. What of the graduates who have moved, changed contact information, or otherwise lost touch? Should an instructor guess? Or should they not be reported? The very nature of this requirement would seem to lend itself to inaccurate results. And if inaccurate, then of what value is the metric? Until and unless the collection of earnings data can be automated and tied to tax returns, this measure will always be flawed.</p> <p>Thank you. (Please see full text of comments attached.)</p>	
https://www.regulations.gov/contentStreamer?documentId=ED-2017-OS-0074-15770&attachmentNumber=1&contentType=msw12	See attached file(s)	84
https://www.regulations.gov/contentStreamer?documentId=ED-2017-OS-0074-15877&attachmentNumber=1&contentType=pdf	<p>These 52 constituents representing Kansas join with the American Association of University Women (AAUW) in urging the U.S. Department of Education to protect Title IX, preserve all of its current regulations and guidance, and fully enforce the law.</p> <p>Title IX of the Education Amendments of 1972 is the federal law that prohibits sex discrimination in education. This vital law affects all areas of education. It requires recipients of federal education funding to evaluate their current policies and practices, adopt and publish a policy against sex discrimination, and implement grievance procedures providing for prompt and equitable resolution of student and employee discrimination complaints.</p> <p>Unfortunately, many students still do not have access to an equitable education free from sex discrimination. As Secretary of Education, you have the power to address this critical civil rights issue and help make schools safer and more equitable for all students. These 52 individuals join with AAUW in urging the U.S. Department of Education to keep in place current Title IX guidance and regulations and fully enforce the law.</p>	60
https://www.regulations.gov/contentStreamer?documentId=ED-2017-OS-0074-9617&attachmentNumber=1&contentType=pdf	Please see attached for comments regarding the state authorization regulation submitted by the Massachusetts Secretary of Education, Attorney General, Commissioner of Higher Education, and Chair of the Board of Higher Education.	482
https://www.regulations.gov/contentStreamer?documentId=ED-2017-OS-0074-9405&attachmentNumber=1&contentType=pdf	See attached file(s)	505
https://www.regulations.gov/contentStreamer?documentId=ED-2017-OS-0074-14616&attachment	See attached file(s)	216

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https://www.regulations.gov/contentStreamer?documentId=ED-2017-OS-0074-9579&attachmentNumber=1&contentType=pdf	See attached file(s)	493
https://www.regulations.gov/contentStreamer?documentId=ED-2017-OS-0074-9407&attachmentNumber=1&contentType=pdf	Thank you for the opportunity to comment. Please see attached.	504
https://www.regulations.gov/contentStreamer?documentId=ED-2017-OS-0074-16079&attachmentNumber=1&contentType=pdf	MALDEF respectfully submits the attached comments.	34
https://www.regulations.gov/contentStreamer?documentId=ED-2017-OS-0074-16295&attachmentNumber=1&contentType=msw12	See attached file(s)	17
https://www.regulations.gov/contentStreamer?documentId=ED-2017-OS-0074-14980&attachmentNumber=1&contentType=pdf	See attached file(s)	194
https://www.regulations.gov/contentStreamer?documentId=ED-2017-OS-0074-9584&attachmentNumber=1&contentType=pdf	On behalf of the Missouri School Boards' Association, thank you for the opportunity to submit comments regarding regulations and guidance by the U.S. Department of Education. MSBA has attached its comments to this message.	490
https://www.regulations.gov/contentStreamer?documentId=ED-2017-OS-0074-9584&attachmentNumber=1&contentType=pdf	Thank you for the opportunity to comment. Please see attached from the School Social Work Association of America.	496

2017-OS-0074-9557&attachmentNumber=1&contentType=pdf		
https://www.regulations.gov/document/ED-2017-OS-0074-13933&attachmentNumber=1&contentType=msw12	See attached file(s)	287
https://www.regulations.gov/document/ED-2017-OS-0074-15310&attachmentNumber=1&contentType=pdf	Please see attached comment letter from Girls Inc. Thank you.	165
https://www.regulations.gov/document/ED-2017-OS-0074-12628&attachmentNumber=1&contentType=pdf	<p>Hello,</p> <p>I am writing to plead with you to retain language present in the current Every Student Succeeds Act (ESSA) to recognize Dyslexia as a Learning Disability require intensive, specialized instruction, intervention and accommodations both within public schools Pre-K through 12 and in institutes of Higher Education. As a 30 year veteran teacher, adult with Dyslexia, parent of 2 adult children with Dyslexia and a Dyslexia Practitioner of 17 years, I have seen the challenges that have been caused over the years with many of the misunderstandings created when schools avoided identifying, serving and providing accommodations for students with Dyslexia. The recent language in ESSA, as highlighted in the "Dear Colleague Letter: Dyslexia Guidance" document (dated Oct. 23rd, 2015), the case for screening, identifying, serving and providing accommodations is clearly stated. This letter was the result of DECADES of research, study and advocacy on behalf of educators, families and individuals of all ages on behalf of those who live with Dyslexia and the challenges (and blessings) that accompany life with Dyslexia.</p> <p>It is IMPERATIVE that language be retained in any educational legislation that REQUIRES public institutions to continue to identify and serve students with Dyslexia, Dysgraphia and Dyscalculia under the category of Learning Disabilities throughout the United States. I do not support any legislator or proposed educational legislation attempting to remove this language from current law, for any reason and strongly urge every member of the current Department of Education and Congress NOT support the removal of this language under ANY circumstances.</p> <p>Advocates, Families, Students and Individuals with Dyslexia, Dysgraphia and/or Dyscalculia has worked tirelessly for MANY years to get this language RECOGNIZED and entered into law. For any member of the Department of Education or any legislator to attempt to remove this language from current legislation is INEXCUSABLE.</p> <p>Therefore, PLEASE, under NO circumstances should you PROPOSE, SUPPORT or VOTE for ANY legislation (regardless of what other information may be contained in the proposed legislation) that involves removing the very clear language, as outlined in the "Dear Colleague" letter. For in so doing, you would be disregarding the efforts of thousands of individuals who worked over the past two decades to ensure that Dyslexia, Dysgraphia and Dyscalculia are recognized as the learning disabilities they are, so we can screen, identify and serve students earlier and provide them with supports they need to nurture their strengths as well. Any legislation that removes or changes this language should not be supported, because it will set efforts back DECADES for absolutely NO</p>	388

	<p>GOOD REASON and this is completely UNACCEPTABLE.</p> <p>Thank you for your consideration.</p> <p>Maureen A. Tarulli M.Ed Dyslexia Practitioner</p>	
https://www.regulations.gov/contentStreamer?documentId=ED-2017-OS-0074-12653&attachmentNumber=1&contentType=pdf	<p>Attached you will find the comment submission from Dr. George Pruitt, President of Thomas Edison State University.</p>	383
https://www.regulations.gov/contentStreamer?documentId=ED-2017-OS-0074-15538&attachmentNumber=2&contentType=jpeg	<p>My daughter was born with hydrocephalus via c section at 37 weeks, had brain surgery to insert a shunt at 6 days old. We began occupational therapy with Easter Seals around 2 months old when her pediatrician noticed that she still tucked her left thumb. Around 8 months, we began physical therapy when she was still having issues beginning to crawl and bear weight. At a year old, her therapist prescribed orthotics for her feet, which were pronated. She's now 19 months old, and nearly walking! She wouldn't be anywhere close without the therapy. Her occupational therapist is also beyond amazing, she's assisting my daughter overcome the nerve damage that has weakened her left hand. With Easter Seals, my daughter has the chance to overcome her disabilities.</p>	131
https://www.regulations.gov/contentStreamer?documentId=ED-2017-OS-0074-9650&attachmentNumber=2&contentType=pdf	<p>To substantially reduce the costs, to both schools and parents, and the time required for resolution of special education disputes, arbitration should be an optional procedure. Existing procedures - the due process hearing and subsequent civil litigation - divert resources (primarily attorneys) that would be better devoted to education. And the time required deprives the student of years of educational benefit. While facilitated meetings and mediation offer shorter timelines and require less resources, too often these alternatives focus on the needs of the parties, both educators and parents, rather than the needs of the student.</p> <p>Many of these concerns can be substantially reduced, if not eliminated, by offering schools and parents the option of arbitration, as outlined in the draft regulation reproduced below. The sole focus of the arbitration proceeding would be the student's educational program. Attorneys would not participate unless the parties agree, and even then the extent of their participation would be at the discretion of the arbitration panel. The arbitration decision would be required within 30 school days, absent exceptional circumstances, and would be implemented under the timeline set by the arbitration panel. Equally important, the arbitration decision would be final with no right of appeal.</p> <p>The three-member arbitration panel would include the primary sources of expertise required to determine an appropriate education for the student: an expert in the child's primary disability, an educator with special education experience, and an attorney familiar with special education law. All would have training in the practice and ethics of arbitration, and each would be chosen randomly.</p> <p>Last, but arguable most important, parents would be provided expert and independent counseling on the strengths and weaknesses of participating in an arbitration proceeding prior to consenting to arbitration</p> <p>Attached are:</p> <p>(1) the text of a proposed regulation 34 CFR 300.521, and (2) the text of a law review article, Rosenfeld, S.James, It's Time for an Alternative Dispute Resolution Procedure, 32-2 NAALJ 361 (Fall 2012), discussing the benefits of arbitration in more detail.</p>	480
https://www.regulations.gov/content	<p>See attached file(s)</p>	470

entStreamer?documentId=ED-2017-OS-0074-10334&attachmentNumber=2&contentType=pdf		
https://www.regulations.gov/contentStreamer?documentId=ED-2017-OS-0074-10377&attachmentNumber=1&contentType=msw12	<p>Please withdraw the DCL of April 4, 2011 and any related documents issued after that date. It is unacceptable that a process of adjudication has been designed, institutionalized, and enforced in a manner that legitimizes the presumption that the accused is guilty, that deprives them of their constitutional right to due process, that has the lowest burden of proof in determining responsibility, and has the authority to impose life-altering sanctions - all occurring in an environment that lacks transparency and accountability.</p> <p>Going forward, all TIX sexual-assault cases should be taken out of the hands of college-administrators. But regardless of where the process resides, the due process rights of accused students should be upheld at all costs, and not denied in order to "protect" accuser. This is NOT EQUITABLE. You cannot deny due process, AND use the lowest burden of proof, AND allow the accuser to appeal the outcome, AND impose life-altering consequences - UNDER THE PRETENSE THAT THIS IS ALL JUST AN EDUCATIONAL EXPERIENCE.</p> <p>The attached document recommends changes to the DCL to include protections for all accused students. This is by no means meant to be an exhaustive list, but as the parent of an accused student, I have tried to demonstrate - by what was NOT AVAILABLE TO MY SON - that accused students are not asking to have misdeeds "swept under the rug." They are simply asking for the basic rights available to anyone accused of a crime - fairness and transparency and the ability to defend themselves.</p> <p>Because the underlying basis for the DCL - to protect students from sexual assault - is undeniably appropriate, the unintended consequence is that it permits, and, in fact, encourages, the very broadest interpretation with the least amount of accountability - on the part of the accuser, and on the administration that acts as the agent for the accuser. The result is that the DCL - despite the lofty intent - is a weapon that can, and is, being used to destroy lives. We can do better, and it is a moral imperative that we do so.</p> <p>Thank you for giving me the opportunity to comment.</p>	460
https://www.regulations.gov/contentStreamer?documentId=ED-2017-OS-0074-15717&attachmentNumber=1&contentType=pdf	<p>As the national trade associations representing the majority of student loan providers in the higher education finance industry, including those loan holders, servicers, and guaranty agencies in the Federal Family Education Loan (FFEL) program, we thank you for the opportunity to provide public comment and participate in accordance with Executive Order 13777, Enforcing the Regulatory Reform Agenda, in identifying regulations that may be appropriate for repeal, replacement, or modification. We look forward to discussing the attached recommendations in greater detail with the relevant staff.</p> <p>Sincerely,</p> <p>Consumer Bankers Association (CBA) Education Finance Council (EFC) National Council of Higher Education Resources (NCHER) Student Loan Servicing Alliance (SLSA)</p>	93
https://www.regulations.gov/contentStreamer?documentId=ED-2017-OS-0074-13415&attachmentNumber=1&contentType=pdf	<p>To: Hilary Malawer, Assistant General Counsel, Office of the General Counsel U.S. Department of Education 400 Maryland Avenue SW., Room 6E231 Washington, DC 20202</p> <p>RE: Docket ID: ED2017OS0074: Evaluation of Existing Regulations</p>	334

ntNumber=1&contentType=pdf	<p>Dear Ms. Malawer:</p> <p>I am an advocate from Bel Air, Maryland. I am writing in response to the U.S. Department of Educations (ED) request for public comment on regulations that may be appropriate for repeal, replacement, or modification as directed by Executive Order 13777 and as part of the Enforcing the Regulatory Reform Agenda led by the Administration.</p> <p>My work/role as an advocate directs me to first tell you that the test of any regulation, guidance, technical assistance and/or other administrative activity must be whether [the regulation/guidance] advances educational equity and serves the interests of all students. Therefore, COPAA believes EDs narrow slant and sole focus in this regulatory review tilts too far toward reducing burden on entities significantly affected by Federal regulations while completely disregarding the most important entity served by our nations education laws students.</p> <p>Therefore, it is on behalf of children with disabilities in Maryland Public Schools and their families that I make the following recommendations:</p> <p>PLEASE SEE ATTACHED LETTER</p> <p>Sincerely, Katy Bosserman, M.Ed. Maryland Advocate</p>	
https://www.regulations.gov/contentStreamer?documentId=ED-2017-OS-0074-13236&attachmentNumber=1&contentType=pdf	<p>Docket ID: ED-2017-OS-0074</p> <p>Name: The Dear Colleague Letter and Resource Guide on ADHD</p> <p>URL: https://www2.ed.gov/about/offices/list/ocr/letters/colleague-201607-504-adhd.pdf</p> <p>I request that the Department of Education retain the Dear Colleague Letter and Resource Guide on Students with ADHD, issued July 26, 2016, as active guidance.</p> <p>This year, my six-year-old son was diagnosed with ADHD, which my wife and I have since learned is the most common mental health disorder among children and teens in the United States today. The news was accompanied with a parallel diagnosis of Generalized Anxiety Disorder, which stems directly from the ADHD. It is of extreme importance to us that he be given every chance to thrive in the public school system.</p> <p>To date, we have benefitted greatly from the public services and resources that have accompanied his diagnosis, and we strongly believe that he and other children like him should continue to receive the same level or more of care and attention that has been offered as a result of this guidance.</p> <p>ADHD affects the academic progress, social success, self-esteem, and overall happiness of 6.4 million American children. Without support and adequate services to mitigate ADHD symptoms in academic and social settings, a child like ours may suffer poor grades, school failure, and long-term damage to self-esteem and learning.</p> <p>The Dear Colleague Letter provides clear, well-informed guidance to help teachers and administrators identify and support struggling students with ADHD. It ensures that students with ADHD have access to a free and public education (FAPE), their guaranteed right under U.S. law. In the year since its release, the Dear Colleague Letter has received no legal, political, or scholarly objections. Furthermore, complaints to the Department of Education regarding discrimination against students with ADHD will almost surely continue to decrease as the Dear Colleague letter is adapted and heeded by schools across the country.</p> <p>When ADHD symptoms are left unaddressed at school, the entire classroom can suffer devastating consequences. By retaining the provisions outlined in the Dear Colleague Letter, the DOE is empowering schools to provide more efficient academic support, save money, and bolster their students learning opportunities. This provision does not meet the criteria for elimination. It is not</p>	<p>349</p>

	<p>outdated, unnecessary, or ineffective; it does not impose costs that exceed benefits; and it does not create a serious inconsistency. Indeed, it is essential and should remain in place.</p> <p>If our sons diagnosis had not been taken seriously, we would be in dire straits right now concerning his education. Instead, he is warmly accepted by his school community and surrounded by individuals who are committed to guiding him and helping him achieve the best possible school experience. Please ensure that he and other children like him all enjoy an equal opportunity to flourish.</p> <p>Sincerely, Jeff Lewonczyk</p>	
https://www.regulations.gov/contentStreamer?documentId=ED-2017-OS-0074-15698&attachmentNumber=1&contentType=pdf	Please see our attached comments.	97
https://www.regulations.gov/contentStreamer?documentId=ED-2017-OS-0074-14486&attachmentNumber=1&contentType=pdf	See attached file(s)	227
https://www.regulations.gov/contentStreamer?documentId=ED-2017-OS-0074-15786&attachmentNumber=1&contentType=pdf	Please find attached comments from the Higher Education Loan Coalition in regards to Docket ID ED-2017-OS-0074-0001	79