

February 04, 2021

Dr. Monica E. Goldson
Chief Executive Officer (CEO)
Prince George's County Public Schools
Office of the Chief Executive Officer
Sasscer Administration Building
14201 School Lane
Upper Marlboro, Maryland 20772

Re: Interferences at IEP Meetings

Dear Dr. Goldson:

I continue to find that the Prince George's County Public Schools (the District) is interfering with proper participation of the parents of my son Insaaf Jamarussadiq (the Student) at his Individualized Education Program (IEP) meetings in retaliation to my disability based advocacy for the Student. I find that the District has been using the following staff to implement this task:

1. Ms. Trena Bowlding, Nonpublic Specialist (the Specialist).

Legal Standards:

1. Section 504 of the Rehabilitation Act of 1973 (Section 504), 29 U.S.C. § 794, and its implementing regulation, 34 C.F.R. § 104, which prohibits discrimination on the basis of disability by recipients of Federal financial assistance. Section 504 also prohibits retaliation;
2. Title II of the Americans with Disabilities Act of 1990 (Title II), 42 U.S.C. § 12131, and its implementing regulation, 28 C.F.R. § 35. Title II prohibits discrimination on the basis of disability by public entities regardless of whether they receive Federal financial assistance. Title II also prohibits retaliation;

3. Title VI of the Civil Rights Act of 1964 (Title VI), 42 U.S.C. § 2000d, and its implementing regulation, 34 C.F.R. § 100. Title VI prohibits discrimination on the bases of race, color or national origin by recipients of Federal financial assistance. Title VI also prohibits retaliation;
4. 34 C.F.R. § 100.7 (e) Intimidatory or retaliatory acts prohibited. No recipient or other person shall intimidate, threaten, coerce, or discriminate against any individual for the purpose of interfering with any right or privilege secured by section 601 of the Act or this part, or because he has made a complaint, testified, assisted, or participated in any manner in an investigation, proceeding or hearing under this part;
5. 28 C.F.R. § 35.134 (a) No private or public entity shall discriminate against any individual because that individual has opposed any act or practice made unlawful by this part, or because that individual made a charge, testified, assisted, or participated in any manner in an investigation, proceeding, or hearing under the Act or this part;
6. 28 C.F.R. § 35.134 (b) No private or public entity shall coerce, intimidate, threaten, or interfere with any individual in the exercise or enjoyment of, or on account of his or her having exercised or enjoyed, or on account of his or her having aided or encouraged any other individual in the exercise or enjoyment of, any right granted or protected by the Act or this part;
7. 34 C.F.R. § 300.322 (a) Each public agency must take steps to ensure that one or both of the parents of a child with a disability are present at each IEP Team meeting or are afforded the opportunity to participate; and
8. 34 C.F.R. § 300.322 (e) The public agency must take whatever action is necessary to ensure that the parent understands the proceedings of the IEP Team meeting, including arranging for an interpreter for parents with deafness or whose native language is other than English.

As a recipient of Federal financial assistance from the United States Department of Education (the Department) and a public entity, the District is subject to Section 504, Title II, Title VI, and their implementing regulations.

The Student's parents attend IEP meetings as parents of the Student and also to represent the Student, but are not being provided full opportunity to participate in the IEP meetings as afforded by law. The parents take time off from their work without pay. The Specialist attends the IEP meetings as representative of the District and is paid by taxpayers. The District has been disrupting the IEP meetings and preventing proper

participation of the Student's parents by interrupting and not allowing them to talk in the past several IEP meetings using the Specialist in spite of my repeated requests to not interfere. The Specialist has been virtually trying to put a cap on my mouth by talking over, interrupting me when I was attempting to talk. This includes the IEP meetings held on October 01, 2020 and January 08, 2021. Audio recordings of the meetings are available for evidence. There were also other types of disruptions to the IEP meetings implemented by the Specialist. I have brought these issues to the District multiple times, including notifications to Ms. Trinell Bowman, Associate Superintendent (the Superintendent), Special Education at the District. However, I find that the District is continuing the interferences using the Specialist. Sometimes the Specialist suggest to move forward before the Student's parents understand the proceedings of the IEP meetings. I believe these interferences will not be possible without your support. As I had shared with you earlier, I had requested the Superintendent to assign a qualified supervisor for the District's nonpublic operations. Another nonpublic specialist informed me that nonpublic supervisor supervises children in nonpublic schools. I suggest that students at nonpublic schools be supervised by their teachers and program aides. Instead let nonpublic supervisor supervise nonpublic specialists.

I request to you to take immediate action to stop the interferences with immediate effect and to fully cooperate with the Student for his education as a child with disabilities.

I had made similar requests to Dr. Kevin Maxwell, Previous CEO of the District regarding various other interferences. But, he did not take my request seriously and left the District abruptly without fixing the problems. I am not sure if he had shared any of my concerns with you. I misunderstood that the things will improve when the next CEO takes in charge.

I like your idea of reorganizing central offices to save tax payers money, which you did when you took in charge. However, I believe that the District discriminated children with disabilities in the District based on their disabilities by excluding Special Education central offices from that reorganization. As a result tax payers money is continuing to be wasted.

I recently received your electronic mail (email) in which you expressed concerns about recent incidents at the U.S. Capitol disrupting the democratic process. Please know that what your staff doing at IEP meeting is a similar thing when they disrupt the IEP process. If your staff have disagreements with lawmakers regarding IEP process, I suggest that they be provided opportunities to express their disagreements in a peaceful

manner. Disrupting IEP meetings in the manner the Specialist does is a mockery of IEP process. By copy of this letter, I am also requesting to include provisions in applicable rules and regulations to hold CEOs accountable even after they leave office, for any violations occurred while being in the office.

If you have any concerns about the Maryland State Department of Education (MSDE) or the State of Maryland (the State), please do not hesitate to bring it to my attention. Thank you in advance for your cooperation for the education of all children with disabilities in the District. If you have any questions or need clarifications, please do not hesitate to contact me.

Sincerely,
Hameed Jamarussadiq

c: Shaheena Simons
Lawrence J. Hogan
Boyd K. Rutherford
Angela Alsobrooks
Karen B. Salmon
Carol A. Williamson
Marcella E. Franczkowski
Dori Wilson
Trinell Bowman
IEP Team
the Specialist
Anthony Wright