IOWA STATE BOARD OF
PUBLIC INSTRUCTION

(Cite as 4 D.P.I. App. Dec. 220)

In re Mr. and Mrs. Jerry Menke	:	
	:	
Mr. and Mrs. Jerry Menke, Appellants	:	
		DECISION
v.	:	
Meriden-Cleghorn Community School District, Appellee	:	[Admin. Doc. 827]

The above-captioned matter was heard on September 27, 1985, before a hearing panel consisting of Dr. Robert Benton, commissioner of public instruction and presiding officer; Mr. David Bechtel, administrative assistant; and Dr. Carol Bradley, administrative consultant. A contested case evidentiary hearing was requested and held pursuant to Iowa Code chapter 17A.12-.17, Iowa Code section 280.16 (Interim Supp. 1985), Iowa Code chapter 290, and departmental rules found in chapter 670--51, Iowa Administrative Code. Appellants were present and unrepresented by counsel. Appellee appeared in the persons of Leland Anderson, district superintendent; and Robert Byers, elementary principal and counselor. Appellee was represented by Counsel Steven Avery of Cornwall, Avery, Bjornstad & Scott, Spencer, Iowa.

Appellants sought review of a decision of Appellee's board of directors (hereinafter "board") refusing to pay tuition for Appellants' children to attend school in the Cherokee Community School District. This case was heard along with four other parents' appeals, also taken from decisions of the Meriden-Cleghorn board.

I.
Procedure

Appellee moved to dismiss Mr. and Mrs. Menke's appeal on the ground that Appellants' three children, who are now under the guardianship of and living with one P. Diane Dugan in the Cherokee Community School District, are not actual residents of Appellee school district and therefore lack standing under Iowa Code section 280.16 (Interim Supp. 1985). That statute allows a student's parent or guardian to obtain review of an action or omission of the board of directors of the district of residence of the student.

Although Appellants, in their affidavit of appeal, did not specifically cite section 280.16, both parties and the hearing panel understood that this was the nature of the appeal. Oral argument by the parties was heard, and a discussion ensued among the presiding officer and the parties as to whether the children were residents of the

Meriden-Cleghorn (hereinafter M-C) district or the Cherokee district, for school purposes.

Following that discussion, a decision was made by the presiding officer to allow the hearing to go forward pending a final decision granting Appellee's Motion to Dismiss. No issues were precluded from being raised by either party.

II.
Findings of Fact

The hearing panel finds that it and the State Board of Public Instruction have jurisdiction over the parties and the subject matter of this appeal.

Mrs. Menke testified that she and her husband are the parents of three children--John Gates, tenth grade; Dan Gates, ninth grade; and Jarod Menke, seventh grade. All of the boys were students in the M-C district until the fall of 1985.

In September 1985, the Menkes allowed guardianship papers to be taken out on their children. Appellee's Exhibit 24 at p. 3. This was done solely for school purposes, in that Appellants were dissatisfied with the M-C district educational programs. The children's guardian, Patricia Diane Dugan, lives in Cherokee and is no relation to Appellants. The boys spend "a minimum of five nights per week in Cherokee, sometimes six or seven." Appellants' Exhibit D at p. 1. Appellants continue to support their children, "paying all of their bills, rent, heat, etc." id., but find that arrangement less expensive than paying nonresident tuition for all three boys. Appellants are aware that placing their children under guardianship does not guarantee that the boys will be conclusively deemed residents of the district in which their guardian resides.

Appellants made three appearances before Appellee's board of directors. In June, 1985, no action was taken on their requests. In fact, the Iowa Code section on which they were relying for relief was not to become effective until July 1, 1985. At the July board meeting, the board voted 3-2 to postpone a decision until the August meeting, despite an earlier discussion in which two or three board members indicated their willingness to deny the requests at that time. (Appellants urge us to find that the board abused its discretion by that discussion. This allegation overlooks the fact that the board did not vote to deny that evening, but voted to postpone decision-making until the August meeting.)

On July 15, Superintendent Anderson wrote to the Menkes requesting a release of their sons' student records which had been transferred to Cherokee. Appellee's Exhibit 4. Mrs. Menke signed the form, but made a notation that she would not consent to a release of Dan Gates' student records. No explanation was offered.

A. John Gates.

John Gates, Appellants' oldest son, is a sophomore at Washington High School in Cherokee. He is taking biology, Spanish I, American literature, geometry, human communications, vocal music, and physical education. Appellee's Exhibit 24 at p. 1. His mother characterized him as a likable

boy who has good grades and has scored well on the ITED (Iowa Tests of Educational Development) and ITBS (Iowa Test of Basic Skills). (Despite Mrs. Menke's reference to his grades and test scores that "the hearing panel members had before" them, Appellants' Exhibit C, a file folder with a number of items included, did not contain such evidence.)

John has hay fever, which is apparently controlled by medication. He and his friends share a fascination for computers and an interest in music, not uncommon in boys of that age. Because of John's involvement as discussion leader of a church group, he sought to become involved with the peer outreach and practicum program at Cherokee. The program was filled when he sought to register, but he may yet be able to enter the program if an opening occurs.

Mrs. Menke cited offerings in debate, speech, computers, and peer helpers at Cherokee as programs which were appropriate for John and not offered at M-C. He is not currently enrolled in any of those programs at Cherokee. Appellants' Exhibit C, the folder, included a computer printout of a program comparison between Cherokee and Meriden-Cleghorn. That printout, presumably prepared by Appellants, indicates that "Computer Ed." and "Adv. Computer" are courses available to only juniors and seniors at Cherokee; on the M-C side, a class called "computer" is offered for sophomores, and Computer II is available for juniors and seniors only.

The thrust of Appellants' argument for the inappropriateness of instructional programming at M-C for John was that John suffered from stress while at M-C, allegedly due to harassment by students or faculty. This stemmed from the fact, according to Mrs. Menke, that John is not an athlete and "in a school system the size of M-C, if you are not an athlete you are not part of the crowd." Appellants' Exhibit D at p. 8.

B. Dan Gates

Appellants' middle son, Dan, is a freshman at Washington High in Cherokee. Since elementary school, Dan has had some problems in school which his parents attribute to his being a very bright, even gifted, child who was not sufficiently challenged. He performed "2 1/2 to 3 years above his age" in a readiness test for kindergarten. Appellants' Exhibit D at p. 4. Dan was enrolled in regular classes through fourth grade, but in fifth grade when "S-" and "N" began replacing "S" and "S+" on his report cards, the Menkes agreed to psychological testing for Dan to determine special needs. Id. at p. 5.

In her testimony, Mrs. Menke referred to the "discussion and recommendations as described in the first psychological report" on Dan, but Exhibit C contained no such information. Her reference to a "staffing" held for Dan leads us to the conclusion that Dan was then involved in a special education program at M-C. We have no way of discerning whether he was diagnosed as having a learning, mental, or behavioral disability, however. Dan's teacher, Mrs. Thompson, was said to have privately encouraged the Menkes to consider removing Dan from M-C and enrolling him in a talented and gifted (TAG) program in another district. For a number of reasons the Menkes chose not to do so. Instead, Mrs. Menke joined Citizen's for a Better Education, the parent-teacher organization at M-C, and began her attempt to convince the district to establish a TAG program. Those efforts were unsuccessful.

After Dan's grades hit a low in eighth grade, the Menkes transferred him to Cherokee for the second semester on a tuition (nonresident) basis. His grades improved somewhat, but more importantly, Mrs. Menke noticed an attitudinal change for the better. Although he still finds himself in trouble occasionally, Mrs. Menke stated that his teachers at Cherokee bring those situations to the Menkes' immediate attention, usually by a telephone call--something she stated did not occur with Dan's teachers at M-C.

Dan is currently enrolled in Spanish I, literature, algebra, human communications, speech, science, band, and physical education at Cherokee. He is not currently involved in the TAG program there. The computer printout found in exhibit C illustrates that Spanish is not available at M-C. (Appellee offers French for students in tenth and eleventh grade). Both schools offer algebra and general science for ninth grade students; both schools have band and physical education as well. Dan's English courses (literature, speech, and human communications) are semester courses at Cherokee. A comparison to corresponding instructional programs at M-C is difficult, because M-C follows the year-long "English I, II, III, and IV" format, where course titles do not disclose specialized course content. No testimony or evidence was offered on these programs.

C. Jarod Menke

Appellant's youngest son is in seventh grade this year at Cherokee. Mrs. Menke's testimony regarding appropriateness of instructional programs at M-C centered exclusively on Jarod's reading ability. Conflicting evidence was presented on this issue. Mrs. Menke alleged that in sixth grade, Jarod was upset because his teacher did not select him to read aloud in class, and his explanation of this fact was because he didn't read fast enough. Appellants' Exhibit D at p. 3. Apparently Jarod was enrolled at the time in a Shedd Learning Program, outside the M-C school district, for children with reading problems. When confronted with this information, Jarod's teacher at M-C stated that she did not recognize any problem with Jarod's reading ability. (His reading scores on the basic skills tests were 51% in the first grade; 90% in second grade; 66% and 67% in third and fourth grades, respectively; and 53% and 65% in fifth and sixth grades, respectively. Appellee's Exhibit 25.) Jarod's sixth grade teacher gave him "S" (Satisfactory) and "S+" marks in reading.

Jarod was tested in the fall of 1984 (sixth grade) by one Paul Thompson, a certified school psychologist who was not employed by either the district or Area Education Agency (AEA) IV. The purpose of the testing was not to diagnose a learning disability but to determine whether or not Jarod would benefit from the Shedd Program. Appellee's Exhibit 25 at p. 2. Mrs. Menke assumed that Jarod had a reading disability.

Upon enrolling at Cherokee, Jarod was given an SRA (Science Research Associates) diagnostic test for purposes of initial placement in an individualized reading laboratory in his regular class. Jarod tested at grade level 3.5, or the equivalent of third grade, fifth month. (Notorized statement of Arleen Hultman, reading instructor at Wilson Middle School in Cherokee, found in Appellants' Exhibit C). There is some dispute as to the level at which Jarod tested for the Shedd Program, but Mrs. Menke believes it was at approximately fourth grade level.

Appellants urge us to find M-C inappropriate for Jarod for failure "to diagnose a learning disability, for not being able to motivate children to their full potential and [for] grades given for undue credit." Appellants' Exhibit D at p. 3. In fact, Mrs. Menke refused to sign a consent form last year for M-C or AEA IV personnel to conduct an evaluation of Jarod's skills, but has given her permission for Cherokee officials to do so. (The testing results were not available at the time of this hearing.) No child can be placed in a public school special education (including learning disabilities) program until AEA personnel have tested him or her. Iowa Code § 281.4(1985); Iowa Administrative Code 670--12.

Appellee school district is located in Cherokee County and has at all times relevant to this appeal been an approved school district. Meriden-Cleghorn is organized into one grade school serving students in kindergarten through sixth grade, and a junior-senior high serving grades seven through twelve. The elementary classes are self-contained through grade four and departmentalized thereafter. Superintendent Anderson testified to a total enrollment figure of 253 students.

Appellee's Exhibit 8 is a copy of the most recent school visit report completed by John Hunter of the Department of Public Instruction. The site visit was made on May 9, 1984. Exhibit 8. Overall comments were good. The report indicates that at the time of the visit the district was experiencing no budget problems, and only minor repairs to the facility were recommended. Id. at p. 1. Recommendations for upgrading the system were directed primarily to computer instruction. Id. at p. 3. Mr. Hunter suggested adding one or two more computers and one printer, and additional teacher in-service in computer training and teaching. Id.

Hunter noted that the district was contemplating reorganization, but he made no recommendation other than to encourage a decision based on fact and the best interests of the students rather than emotions and personal preferences. Id. The regional consultant also applauded the district for its efforts in the area of drug and alcohol abuse instruction and community use of facilities. Id.

The 1985-86 district Handbook (Appellee's Exhibit 10) illustrates curricular requirements. Forty credits are currently required for graduation to be obtained between grades nine and twelve. Those credits and additional course offerings appear in each subject area as follows:

Category	Required Credits	Available Credits
Science*	4	8
English	7	9
Social Science	5	9
Mathematics	5	13
Computer Science grades 11 and 12 only	1	2
Foreign Language (French)	0	4
Physical Education	1 (1/8 each sem.)	1
Electives	17	37**
	40	83

Exhibit 10 at pp. 1, 17.

*Chemistry was not listed in the course offerings on p. 17, but physics was listed twice ("jr. year" and "sr. year"). We will presume this was a typographical error in that testimony on both sides indicated physics and chemistry are offered in alternating yearly sequence.

**This estimated count assumes that a student may take vocal or instrumental music every semester (1/4 credit per semester) between grades nine and twelve, but may not repeat general music nor any other courses for credit. Superintendent Anderson testified that "if needed," music credits count toward graduation.

The district employs Leland Anderson as superintendent and athletic director. The elementary principal and K-12 guidance counselor is Robert Byers, who also teaches elementary physical education. Paul Pederson serves as junior-senior high school principal in addition to teaching physical education and coaching. There are twenty-two full-time certified staff and three part-time staff members. A nurse is on duty one day per week. Learning disabled students are taught on site, but Appellee's other special education students are served in nearby districts. The district is not party to any academic sharing agreements with other school districts under Iowa Code sections 257.26, 282.7, or 280.15.

In terms of total experience, teachers and administrators in the M-C system have an average of thirteen years. The balance is healthy: six teachers have between zero and five years experience, four have taught from six to ten years, fifteen staff members have eleven to twenty years of experience, and four have put in more than twenty years in the classroom. Appellee's Exhibit 13.

The secondary staff does appear to be very fully utilized. Of fifteen staff members teaching in an eight-period day, one has seven preparations (different courses to teach in a day), five have six, two have five, and six have fewer than five preparations. Appellee's Exhibit 14. No evidence was submitted regarding the number of graduate hours or advanced degrees obtained by certified staff at M-C.

Exhibit 12 illustrates music program events in the M-C district. In the 1984-85 school year, a musical was held, five vocal music events took place, and the band entered five contests and performed in a college homecoming parade. A variety of bands are available to the instrumental music student including marching band, jazz combo, and festival band along with an opportunity for solo performances. Appellee's Exhibit 12.

From 1980 to 1986, teacher turnover at Meriden-Cleghorn averaged approximately four per year or slightly over fourteen per cent of staff yearly. Appellee's Exhibit 21. No figures regarding the state or national averages of teacher turnover were submitted.

Meriden-Cleghorn does not offer a formal talented and gifted program. Instead, the district offers enrichment activities designed to challenge all interested elementary students. One program, dubbed the "Individual Achievement Program" (I.A.P.), was in place from 1974 to 1985 and was designed to serve <u>all</u> elementary students on a voluntary basis, not just talented and gifted students. To become involved, students needed to give up their recess time and any free periods. A recent addition to the

curriculum, replacing I.A.P., is called "Creative Initiating Abilities," or C.I.A., which was adopted by the board in September, 1985. Appellee's Exhibit 27.

The guideline for entry into this program is scoring at a minimum of the 80th percentile on ITBS [Iowa Tests of Basic Skills], provided those students demonstrate initiative and interest in participation. Presumably teachers must vouch for a student's creativity (or potential), and a student's grades and standardized test scores would be used in determining "above average ability or achievement." As the program was yet to be implemented at the time of this hearing, we can only speculate on its ability to challenge its target students. There is no corresponding program available at M-C's junior-senior high school.

III.
Conclusions of Law

The first issue before this panel is whether or not the Menkes have standing to appeal under Iowa Code section 280.16. That statute reads as follows:

> 280.16 APPROPRIATE INSTRUCTIONAL PROGRAM REVIEW.
> Pursuant to the procedures established in chapter 290, a student's parent or guardian may obtain a review of an action or omission of the board of directors of the district of residence of the student on either of the following grounds:
> 1. That the student has been or is about to be denied entry or continuance in an instructional program appropriate for that student.
> 2. That the student has been or is about to be required to enter or continue in an instructional program that is inappropriate for that student.
> If the state board of public instruction finds that a student has been denied an appropriate instructional program, or required to enter an inappropriate instructional program, the state board shall order the resident district to provide or make provision for an appropriate instructional program for that student.

Iowa Code § 280.16 (Interim Supp. 1985). Clearly, standing will be found if the district of residence of the Appellants' children is Meriden-Cleghorn.

The leading case discussing student residency for school purposes in Iowa is Mt. Hope School District v. Hendrickson, 197 Iowa 191, 197 N.W. 47 (1924). That case involved two teenage boys whose father sent them to Iowa from Canada to live with their uncle as guardian after the boys' mother died. Mt. Hope, 197 Iowa at 193, 197 N.W. at ___. The school district in which the uncle lived refused to recognize the boys as actual residents. Id. at 192, 197 N.W. at ___.

The court laid down a two-part test to determine residency. Id. at 194, 197 N.W. at ___. "If a minor leaves the home of his father, to reside in another place for the sole purpose of securing free public school education, without bringing with him an actual residence, and with

the intent to return to his former residence, he does not become an actual resident, within the purview of our school law." Id. at 194, 197 N.W. at ___. The two factors are motivating purpose and intent to remain.

In this case, Appellants were quite candid about the purpose behind the guardianship: it was to allow the boys to attend school without tuition. No other reason, such as a marital problem or a disciplinary problem, was cited. The "sole purpose" was to secure tuition-free education for the boys.

The boys' intent to return to their parents' home is also clear from the record; in fact, the parents are seeking review in this case in order to allow the boys to return home and once again live as a family.

In Lakota Consolidated Independent School v. Buffalo Center/Rake Community Schools, 334 N.W.2d 704 (Iowa 1983), the Iowa Supreme Court briefly addressed the issue of student residency:

> [W]e are convinced that residency for purposes of section 282.1 is to be determined based upon the location where the students are in fact residing and does not change merely by the appointment of a non-resident guardian.

334 N.W.2d at 709. In that case, some of the children had appointed nonresident guardians with whom they lived, and others had appointed nonresident guardians but continued to live with their parents. On remand from the Iowa Supreme Court, Judge Vipond, sitting as the district court for Kossuth County, found no distinction between those two types of guardianships. He ruled that even where the children "actually" lived with guardians in another district, the sole reason for attempting to establish residency by that method was for school purposes, and the children were thus true residents of their parents' district for school purposes. Lakota Consolidated Independent School v. Buffalo Center/Rake Community Schools, No. E-21366, Kossuth County District Court, 10/12/84. See also 1958 O.A.G. 198; 1938 O.A.G. 69; 1934 O.A.G. 355; 1926 O.A.G. 457; 1 D.P.I. Dec. Rul. 1 (1975); 1 D.P.I. Dec. Rul. 80 (1984).

We find, therefore, that our preliminary determination (that the children were not actual residents of the M-C district as contemplated by section 280.1) was in error, and John and Dan Gates' and Jarod Menke's guardianship with P. Diane Dugan is not valid to establish bona fide residency for school purposes in the Cherokee district. Their primary residence is with their parents in the M-C district. We fully recognize the fact that as a result of this conclusion Appellants would appear to be subjected to an assessment of tuition at Cherokee. However, they clearly knew that was a possibility when they appeared before this panel. See Appellant's Resistence to Appellee's Motion to Dismiss.

Having thus established Appellants' standing to obtain State Board review of Appellee's decision under 280.16, we are now obliged to resolve the issue whether Appellants have carried their burden of proving inappropriateness of instructional program with respect to their three boys. In Berg, et al. v. Lakota Consolidated Independent School District, 4 D.P.I. App. Dec. 150 (1986), we established that appropriateness would be resolved on a case by case basis, focusing on the needs and abilities

of each child, but considering all relevant evidence. Berg, 4 D.P.I. App. Dec. at 174.

A. John Gates

John Gates, Appellants' oldest son, has an interest in computers and music which Mrs. Menke alleges is not able to be fulfilled at M-C. Both his former district and his current district offer courses in computers. In fact, M-C makes its computer class available to sophomores where Cherokee limits enrollment to juniors and seniors. The unmistakable conclusion to be drawn from this is that were John enrolled at M-C, he could be taking a computer course this year. John's interest in instrumental music was an allegation we accept as fact, but since both districts offer band, we are at a loss to find what is inappropriate for John at M-C with respect to band.

Mrs. Menke also raised speech and debate courses as being appropriate for John Gates. Those curricular areas are included in the course offerings at Cherokee. Since M-C's English courses are listed as English I-IV, we cannot determine whether those classes do or do not include units in speech and debate. The Iowa Code requires a minimum of "four units of English-language arts for grades nine through twelve." Iowa Code § 257.25(6)(c) (1985). Departmental rules are silent with regard to speech and debate. See Iowa Administrative Code chapter 670. Appellants were not able to or failed to provide sufficient proof, beyond a generally stated desire, that debate and speech are appropriate for John. On that basis, we cannot find the M-C educational program inappropriate.

Similarly, Mrs. Menke's allusion that the lack of a "peer helper program" at M-C results in that district being inappropriate for John is unsubstantiated. While M-C does not have such a program and Cherokee does, we must have more basis than a mere stated desire on which to find inappropriateness of instructional program. Accord Berg, et al. v. Lakota, 4 D.P.I. App. Dec. 150, 174. Further, we are not convinced that a peer helper arrangement qualifies as an "instructional program" under section 280.16.

We do not find any instructional programs at M-C inappropriate for John Gates.

B. Dan Gates

The record is equally lacking to support Mrs. Menke's allegation of inappropriateness of Appellee district for Dan Gates. In fact, we have no clear picture of whether Dan is special education or a talented and gifted student. If additional challenge is appropriate for Dan, one would assume he would be enrolled in Cherokee's TAG program, if he is qualified. All courses in which he is enrolled at Cherokee are available at M-C, with the exception of Spanish (not raised as an issue), and with the possible exception of speech and "human communications." The mere fact that those courses are not offered, without corresponding evidence to prove Dan's needs or abilities can only be fulfilled with those courses, is insufficient to carry the burden of proof.

We do not find any instructional programs at M-C inappropriate for Dan Gates.

C. Jarod Menke

The evidence is contradictory with respect to Jarod Menke's reading ability. Appellants truly believe their youngest son suffers from a learning disability related to his ability to read. At the time of hearing, no such finding had been formally made. Appellee's position is that Jarod's standardized test scores and in-class performance did not constitute cause to suspect a learning disability or reading dysfunction in Jarod. We are somewhat perplexed by the inconsistency in his scores, particularly with reference to his current placement at level three reading in the SRA lab series. Nevertheless, we are aware that a child's mental state, including the amount of rest he had prior to test taking and his ability to concentrate, can affect test results. While we do not dispute his reading placement at Cherokee, we recognize that a determination of a true reading disability is made on a stronger basis than one in-class diagnostic test. The evidence is insufficient for us to state conclusively that Jarod Menke has such a disability. As this issue was the only one raised with respect to M-C's inappropriateness for Jarod, we cannot uphold Appellants' position.

Following this hearing, after the evidence was closed but before the decision was rendered, Mr. Robert Byers, elementary principal and guidance counselor at Meriden-Cleghorn, wrote to Dr. Benton, commissioner of public instruction and presiding officer over this hearing. Dr. Benton did not read the letter, having recognized it as ex parte communication. The letter was placed in the custody of a non-panelist staff member.

Iowa Code chapter 17A (the Administrative Procedures Act) governs, among other procedures, contested cases heard by agencies. See Iowa Code §§ 17A.11-.17(1985). Section 17A.17 governs ex parte communications, and subsection 2 of that Code provision reads as follows:

> 2. Unless required for the disposition of ex parte matters specifically authorized by statute, parties or their representatives in a contested case shall not communicate, directly or indirectly, in connection with any issue of fact or law in that contested case, with individuals assigned to render a proposed or final decision or to make finding of fact and conclusions of law in that contested case, except upon notice and opportunity for all parties to participate as shall be provided for by agency rules. The agency's rules may require the recipient of a prohibited communication to submit the communication if written or a summary of the communication if oral for inclusion in the record of the proceeding. As sanctions for violations, the rules may provide for a decision against a party who violates the rules; for censuring, suspending or revoking a privilege to practice before the agency; and for censuring, suspending or dismissing agency personnel.

Iowa Code § 17A.17(2)(1985). Departmental rules, found in the Iowa Administrative Code at chapter 670--51.7, complement the Code provision. Rule 51.7(2) directs that any correspondence received in violation of these rules shall be included in the record of the proceeding. The communication from Mr. Byers is now a part of the record.

We must censure Mr. Byers and the Meriden-Cleghorn District for allowing this communication to be made. Appellees were sent a copy of our hearing procedures at the outset of this appeal, and thus informed, there is no excuse for such a flagrant violation. Should it recur, we would not hesitate to take stronger action against the district.

IV.
Decision

For the foregoing reasons, the decision of Appellee's board of directors made on August 12, 1985, is hereby affirmed. All other motions or objections not previously ruled upon are hereby denied and overruled. Costs of this appeal, if any, under Chapter 290 are assigned to Appellants.

February 13, 1986
DATE

LUCAS J. DEKOSTER, PRESIDENT
STATE BOARD OF PUBLIC INSTRUCTION

February 3, 1986
DATE

ROBERT D. BENTON, Ed.D.
COMMISSIONER OF PUBLIC INSTRUCTION
AND PRESIDING OFFICER