

**2015-16 Exceptional Student Education
Monitoring and Assistance
On-Site Visit Report**

**Putnam County School District
February 23-25, 2016**



This publication is produced through the Bureau of Exceptional Education and Student Services (BEESS), Division of K-12 Public Schools, Florida Department of Education (FDOE), and is available online at <http://www.fldoe.org/ese/pub-home.asp>. For information on available resources, contact the BEESS Resource and Information Center (BRIC).

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September 19, 2016

Ms. Phyllis Criswell, Superintendent
Putnam County School District
200 Reid Street
Palatka, Florida 32177-3736

Dear Superintendent Criswell:

The Bureau of Exceptional Education and Student Services (BEESS) is pleased to provide you with the 2015-16 Exceptional Student Education (ESE) Monitoring and Assistance On-Site Visit Report for Putnam County School District. This report was developed by integrating multiple sources of information related to an on-site monitoring visit to your school district on February 23-25, 2016. Those information sources included interviews with district and school staff, local educational agency profiles, and an action-planning and problem-solving process.

The Putnam County School District was selected for an on-site visit for the following focus areas related to students with disabilities: graduation rate, dropout rate and coordinated early intervening services for discipline. The on-site visit was conducted by a state support team (SST), which included BEESS staff and discretionary project staff.

The 2015-16 ESE Monitoring and Assistance process focuses on those State Performance Plan indicators that contributed to the targeting of school districts for coordinated early intervening services and those indicators that affect equity and access in the educational environment for students with disabilities. Additionally, the process focuses on a shift from ESE compliance to outcomes to prepare all students for college, career and life readiness, which include: increasing standard diploma graduates, decreasing the number of students dropping out of school, increasing regular class placement, decreasing the need for seclusion and restraint, and eliminating disproportionality in eligibility identification and discipline.

Ms. Libby Weaver, Director of ESE, and her staff were very helpful to the SST in preparing for and throughout the on-site visit. In addition, school-level personnel welcomed SST members and demonstrated a continued commitment to the education of students in the school district. This report will be posted on the BEESS website and may be accessed at <http://www.fldoe.org/ese/mon-home.asp>.

Monica Verra-Tirado, Ed.D., Chief
Bureau of Exceptional Education and Student Services

Superintendent Criswell
September 19, 2016
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Thank you for your commitment to improving services to exceptional education students in the Putnam County School District. If there are any questions regarding this report, please contact me at 850-245-0475 or via email at monica.verra-tirado@fldoe.org.

Sincerely,

A handwritten signature in blue ink that reads "Monica Verra-Tirado". The signature is written in a cursive style and is contained within a thin black rectangular border.

Monica Verra-Tirado, Ed.D., Chief
Bureau of Exceptional Education and Student Services

Enclosure

cc: Libby Weaver
Heidi Metcalf
April Katine

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Authority

The Florida Department of Education (FDOE), Bureau of Exceptional Education and Student Services (BEESS), in carrying out its roles of leadership, resource allocation, technical assistance, monitoring and evaluation, is required to oversee the performance of district school boards in the enforcement of all exceptional student education (ESE) laws (sections 1001.03(3), 1003.571 and 1008.32, Florida Statutes [F.S.]) and rules. One purpose of the Individuals with Disabilities Education Act (IDEA) is to assess and ensure the effectiveness of efforts to educate children with disabilities (s. 300.1(d) of Title 34, Code of Federal Regulations [CFR]). BEESS is responsible for ensuring that the requirements of IDEA and the educational requirements of the state are implemented (34 CFR §300.149(a)(1) and (2)).

In fulfilling this requirement, BEESS monitors ESE programs provided by district school boards in accordance with ss. 1001.42, 1003.57 and 1003.573, F.S. Through these monitoring activities, BEESS examines records and ESE services, evaluates procedures, provides information and assistance to school districts and otherwise assists school districts in operating effectively and efficiently. The monitoring system is designed to facilitate improved educational outcomes for students while ensuring compliance with applicable federal laws and regulations and state statutes and rules.

Under 34 CFR §300.646(b)(2), if a state identifies significant disproportionality based on race or ethnicity in a local educational agency (LEA) with respect to the identification of children as children with disabilities, the identification of children in specific disability categories, the placement of children with disabilities in particular educational settings or the taking of disciplinary actions, the LEA must use the maximum amount (15 percent) of funds allowable for comprehensive coordinated early intervening services (CEIS) for children in the LEA who are not currently identified as needing special education or related services, but who need additional academic or behavioral supports in order to succeed in a general education environment. These children should include particularly, but not exclusively, children in those groups that were significantly over-identified.

Section 1003.573, F.S., Use of restraint and seclusion on students with disabilities, establishes documentation, reporting and monitoring requirements for districts regarding the use of restraint and seclusion on students with disabilities. It also requires districts to have policies and procedures in place that govern parent notification, incident reporting, data collection and monitoring the use of restraint or seclusion for students with disabilities. As required, FDOE has established district- and school-based standards for documenting, reporting and monitoring the use of restraint and seclusion. These standards are included in each district's ESE Policies and Procedures document.

ESE Monitoring and Assistance Process

Background Information

The 2015-16 ESE Monitoring and Assistance process focuses on those State Performance Plan indicators that contributed to the targeting of school districts for CEIS and the following indicators that affect equity and access in the educational environment for students with disabilities:

- Indicator 1 – Graduation: Percentage of youth with individual educational plans (IEPs) graduating from high school with a regular diploma.

- Indicator 2 – Dropout: Percentage of youth with IEPs dropping out of high school.
- Indicator 4 – Rates of suspension and expulsion:
 - A. Percentage of districts that have a significant discrepancy in the rates of suspensions and expulsions of greater than 10 days in a school year for children with IEPs.
 - B. Percentage of districts that have (a) a significant discrepancy, by race or ethnicity, in the rate of suspensions and expulsions of greater than 10 days for children with IEPs; and (b) policies, procedures or practices that contribute to the significant discrepancy and do not comply with requirements relating to the development and implementation of IEPs, the use of positive behavioral interventions and support, and procedural safeguards.
- Indicator 5 – Educational environments:
Percentage of children with IEPs aged 6 through 21:
 - A. In the regular class 80 percent or more of the day
 - B. In the regular class less than 40 percent of the day and
 - C. In separate schools, residential facilities or homebound/hospital placements.
- Indicator 10 – Disproportionality, specific disability categories: Percentage of districts with disproportionate representation of racial and ethnic groups in specific disability categories that is the result of inappropriate identification.
- CEIS – Services provided to students in kindergarten through Grade 12 (with a particular emphasis on students in kindergarten through Grade 3) who are not currently identified as needing special education or related services, but who need additional academic and behavioral supports to succeed in a general education environment.
- Restraint – Rate of incidents of restraint, as reported on the FDOE website.
- Seclusion – Rate of incidents of seclusion, as reported on the FDOE website.

The ESE Monitoring and Assistance process includes four phases:

- Phase 1 is composed of planning activities that occur in advance of the first on-site visit to the school district.
- Phase 2 is the initial on-site visit to the selected school district by the state support team (SST).
- Phase 3 is follow-up and post-initial visit activities, which are conducted by a designated follow-up team, as determined by the SST, and identification of the ongoing data that will be collected.
- Phase 4 is evaluation of the effectiveness of the school district's action plan, and should include participation of the comprehensive team that was involved in Phase 1.

In a letter dated September 21, 2015, the superintendent of the Putnam County School District was informed that BEES would be conducting an on-site monitoring visit for the following focus areas: graduation rate, dropout rate and CEIS for discipline.

School Selection

Upon review of the district's data, it was determined that the monitoring and assistance process would involve the following schools for school-level administrator, teacher and student focus groups, and school walk-through debriefings:

- Interlachen High School
- Palatka High School
- Crescent City Junior/Senior High School

On-Site Activities

On-Site Visit Team

The following SST members planned or conducted the monitoring and assistance for the on-site visit:

FDOE, BEESS

- April Katine, Educational Program Director, Bureau Resource and Information Center
- Beth Moore, Senior Educational Program Director, Instructional Support Services
- Renee Jenkins, Senior Educational Program Director, Dispute Resolution and Monitoring

FDOE, BEESS Discretionary Projects

- Ann Selland, Problem-Solving Facilitator, Problem Solving: Response to Intervention (PS:RtI)
- Carly Detlefsen, Region 2 Northeast Coordinator, Project 10: Transition Education Network
- Carl Coalson, Project Manager, Multiagency for Students with Emotional and Behavioral Disabilities (SEDNET)
- Amy Lane, Program Administrator, Florida Diagnostic and Learning Resources System Associate Centers (FDLRS)
- Paula DaSilva, Facilitator, Positive Behavior Interventions and Supports (PBIS)

Data Collection

On-site monitoring and assistance activities included the following:

- Review of recent data
- Welcome session with district and school-level staff – 20 participants
- School-level administrator focus groups – 20 participants
- Teacher focus groups – nine participants
- Multi-tiered System of Support (MTSS) focus group – three participants
- Student focus groups – 19 participants
- School walk-through debriefings – 22 classrooms
- Action-planning and problem-solving process – 17 participants

The district completed the Best Practices for Inclusive Education assessment with Florida Inclusion Network (FIN) facilitators on September 29, 2014. Data were collected regarding leadership and decision making, instruction and student achievement, and communication and collaboration indicators. An initial FIN Services Plan was developed on October 24, 2014, and included the following goals relevant to the 2015-16 on-site monitoring visit:

- The district will provide job-embedded, collaborative professional development and technical assistance to district and school staff to implement best practices for inclusive education.
- All applicants will respond to interview questions that appraise the applicant's knowledge and beliefs pertaining to diversity and inclusion.

2015-16 ESE Monitoring and Assistance On-Site Visit Results

The following data are related to the focus areas and activities for the 2015-16 ESE Monitoring and Assistance On-Site Visit for Putnam County School District.

Graduation Rate

The federal uniform high school graduation rate for students with disabilities is calculated by taking the number of first-time ninth graders from four years ago, plus incoming transfer students on the same schedule to graduate, minus students from this population who transferred out or left to enroll in a private school or home education, divided by the number of standard diplomas from the same group. The district's 2014-15 federal graduation rate for students with disabilities is **29.1** percent, which is **below** the state rate.

	2011-12	2012-13	2013-14	2014-15
Putnam	31.7%	28.9%	33.1%	29.1%
State	47.7%	52.3%	55.1%	56.8%

Dropout Rate

The federal dropout rate for students with disabilities is calculated by taking the number of students who exited special education as a result of dropping out, divided by the number of students who graduated with a regular high school diploma, special diploma, certificate of completion, special certificate of completion, dropped out or died. The district's 2014-15 federal dropout rate for students with disabilities is **28.8** percent, which is **above** the state rate.

	2011-12	2012-13	2013-14	2014-15
Putnam	18.2%	24.2%	20.6%	28.8%
State	21.1%	20.3%	19.2%	18.7%

Coordinated Early Intervening Services – Discipline

Districts are required to set aside 15 percent of IDEA funds for CEIS if incidents of removal of students with disabilities through in-school suspension (ISS), out-of-school suspension (OSS) or expulsion for students with disabilities of any given race are at least 3.5 times more likely to occur when compared to all other races combined. Data show that during the 2013-14 school year, the district's incidents of removal of black students with disabilities through ISS, OSS or expulsion, were **3.70** times more likely to occur when compared to all other races combined.

The 15 percent of the IDEA Part B funds were to be used for students who are not currently identified as needing special education or related services, but who are receiving additional behavioral supports in order to succeed in the general education curriculum. The 2015-16 school year was the first school year the district was required to set aside 15 percent of their IDEA funds for CEIS related to discipline.

Prior to the on-site visit, the district provided BEESS with data and upon review of the data with district staff, it became evident that the district had data reporting errors at the elementary-school level. The district indicated after analyzing data that the elementary schools were reporting students as being assigned to ISS when, in fact, they were being offered a timeout to calm down. The following interventions are being implemented districtwide in order to provide assistance to the CEIS target students:

- Improved progress monitoring

- Focus on preventative measures to improve behavioral outcomes, which will include:
 - An increase in mental health counselors by providing two additional counselors
 - An increase in classroom management support by providing three behavior management assistants
 - Closely monitoring students in Tiers 2 and 3 for issues related to attendance, referrals, clinic visits and behavior changes
- Principals were provided training on data-entry elements that may have been leading to the over-identification of students being reported in ISS, as opposed to a timeout. Principals were also advised to check whether:
 - Multiple referrals were being entered for the same incident
 - Multiple referrals were being written for the same action
 - ISS coding was being used when teachers send the student to another teacher for a “cool down” period

Interviews Conducted

Administrator Focus Groups

Members of the SST conducted focus groups with administrator staff members from Interlachen High School, Palatka High School and Crescent City Junior/Senior High School regarding graduation rate, dropout rate and CEIS for discipline.

Themes that emerged from the administrator focus groups included the following:

- The following initiatives are working well:
 - Panthers Academic Social Career Amazing Race (school's mentoring rewards program for all students)
 - Workshops on career readiness provided by the Rotary Club
 - Chrome books for all students
 - Kahn Academy (online science and math tutoring program) for all students
 - American College Testing preparatory classes
 - Eighteen-credit option for graduation
 - Volcano Pass (cool-down program with designated person in place for students who become upset)
 - Boot Camp for algebra and English language arts for all students
 - Credit recovery lab for all students
 - The MTSS process, which alerts school staff when students are in need of support
- The following items are contributing to the high dropout rate and low graduation rate:
 - Lack of parental support
 - Students leaving school to attend First Coast Technical School
 - Students leaving school to earn a GED® and earn a career and technical education (CTE) certification in a paid work experience
 - Students leaving school to earn a paycheck
 - Student apathy and lack of attendance
 - Ninth graders unprepared for high school rigor
- More training and support are needed as follows:
 - Training in early warning systems (EWS)
 - Additional professional personnel to support the individual academic needs and wraparound services
 - Training in scaffolding, differentiated instruction, accommodations, inclusion and project-based lessons
 - Professional development in graduation options and how to use CTE course

- substitutions within the diploma options and more access to CTE courses
- Professional development on diploma options, accommodations and more professional development days
- Training on trauma-informed care
- Partnerships with local businesses

Teacher Focus Groups

Members of the SST conducted focus groups with teachers from Palatka High School and Crescent City Junior/Senior High School regarding graduation rate and dropout rate.

Themes that emerged from the teacher focus groups included the following:

- The MTSS process includes a districtwide EWS that identifies students who are off track and need supports to stay in school and successfully graduate.
- Schools offer credit recovery and tutoring before and after school, and during lunch.
- A student's lack of consistent attendance affects academic success and the ability to graduate.
- There are language barriers with the migrant students and parents.
- A parent's lack of motivation and negative influence could affect a student's behavior.
- More support from community partners would be appreciated.
- There is a need for more training on accommodations and modifications, differentiated instruction and universal design for learning, and behavior intervention and EWSs related to student risk factors.

Multi-tiered System of Support Focus Group

Members of the SST conducted a focus group with MTSS team members from Interlachen High School regarding CEIS discipline.

Themes that emerged from the MTSS focus group included the following:

- Staff work with parents that are present at school by providing resources and making them feel welcome, and by using different methods of communication (e.g., email, texts).
- Use of Peace Talk (students express feelings to resolve issues with peers), contracts and conflict resolution to try to resolve issues without adding to a student's discipline record.
- Timeout in the ISS room is used as a strategy for students to calm down.

Student Focus Groups

Members of the SST conducted focus groups with students from Interlachen High School, Palatka High School and Crescent City Junior/Senior High School. The students were asked to share their perspectives on topics such as support from teacher, post-school goals, assistance received to prepare for life after high school, causes of dropout, disciplinary issues, and additional resources or services needed.

Comments from the student focus groups included the following:

- There is support for having discussions regarding students' goals for graduation with the administration, counselors and teachers.
- Discipline interventions in the last few years have assisted in reducing discipline issues.
- Parents encourage students to stay in school.
- There are no consistent academic support services in the general education classrooms.

- Grades are negatively impacted by the attendance policies.
- Block scheduling causes difficulty with catching up on work when students are absent.
- There is inconsistency in being provided work and receiving credit for work while in ISS.
- ISS is given for both minor and major infractions of the student code of conduct.
- School staff contact parents with negative feedback but not positive, even when parents contact the school.
- At one school, students expressed a lack of hope in catching up on credits. Students also indicated that administrators and teachers have given up by not providing the needed support to be successful.
- More electives, CTE courses and after-school activities, such as clubs, are desired.

School Walk-Through Debriefings

School walk-through debriefings were conducted at Interlachen High School, Palatka High School and Crescent City Junior/Senior High School.

Observations from the school walk-through debriefings included the following:

- Most classrooms had adequate materials and technology was available.
- At one school, students were actively engaged, except during ISS.
- At one school, whole-group instruction was being provided and students appeared engaged.
- At one school, bio-tech and engineering classes had technology available; however, the rest of the school appeared to be lacking in technology.
- One school had hallways that displayed beautiful paintings and encouraging quotes on the walls.
- All schools were clean, bright and conducive to learning.

Commendations

1. The district offers boot camps for math and English language arts at the high-school level for all students.
2. In collaboration with SEDNET, the district initiated an emotional behavioral disability task force to reduce student arrests. This collaboration of community partners has reduced school-based arrests.
3. The district partnered with a community substance abuse and mental health agency to secure a grant to provide mental health therapists for all middle and high schools. These staff will work in conjunction with the school-based MTSS team.
4. Due to the district’s decreased risk ratio for CEIS discipline, the district is not required to withhold funds for CEIS for the 2016-17 school year.

2015-16 Action-Planning and Problem-Solving Process and Next Steps

Next Steps	
Graduation Rate	
Summary	The districts graduation rate for the past four years has been below the state rate. In the 2013-14 school year, the district’s graduation rate was 33.1 percent, and the state rate was 55.1 percent; and in the 2014-15 school year, the district’s graduation

	rate was 29.1 percent, and the state rate was 56.8 percent.
Recommendations	<ul style="list-style-type: none"> Continue to work with PS:Rtl and Project 10 to develop an EWS to monitor the progress of students at risk of not graduating and also at risk of dropping out. Project 10 should provide each high school with training and technical assistance in EWSs, according to the action plan developed while onsite.
Required Actions	<p>The district is required to compile and monitor data quarterly for at-risk students to ensure that students are on track to graduate. In addition, the district must engage in problem-solving activities and determine what strategies to use for students who are not on track to graduate.</p> <p>The quarterly data and a summary on problem-solving activities must be provided to the district's BEESS liaison by the following dates:</p> <ul style="list-style-type: none"> October 14, 2016 February 13, 2017 April 17, 2017
Dropout Rate	
Summary	In the 2014-15 school year, the district's dropout rate was 28.8 percent, which is above the state rate of 18.7 percent.
Recommendations	Same recommendations as above.
Required Actions	Same required actions as above.
CEIS – Discipline	
Summary	For the 2013-14 school year, the district's incidents of removal of black students with disabilities through ISS, OSS or expulsion, were 3.70 times more likely to occur when compared to all other races combined. While on site, the action-planning group identified a concern related to data reporting errors. The district indicated after analyzing data that the elementary schools were reporting students as being assigned to ISS when, in fact, they were being offered a timeout to calm down.
Recommendations	The district should monitor and review its CEIS discipline data for incidents of removal of students with disabilities through ISS, OSS or expulsion for students of any given race. The district should engage in data-based problem-solving, focusing on strategies and interventions for implementation. In addition, the district should continue to monitor the discipline data to ensure that the principals are coding timeout correctly.
Required Actions	None
Phases 3 and 4 of the ESE Monitoring and Assistance Process	
Summary	By January 9, 2017 , the SST, ESE director and designated district staff will evaluate the effectiveness of the school district's action plan and determine additional next steps, as appropriate, via a

	scheduled telephone call. The district will provide documentation to be discussed to the district's BEESS liaison prior to the scheduled call.
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Technical Assistance

1. **Implementing a Multi-Tiered System of Support for Behavior: Recommended Practices for School and District Leaders** (Florida's PBIS Project) may be accessed at http://flpbs.fmhi.usf.edu/pdfs/RTIB%20Guide%20101811_final.pdf and provides an overview of the critical components of an MTSS for behavior. These critical components describe systems changes that are necessary for a results-driven ESE system.
2. The district's **ESE Policies and Procedures** document provides district- and school-based standards for documenting, reporting and monitoring the use of manual, physical or mechanical restraint and seclusion developed by the FDOE. The school district's document for the 2013-14 through 2015-16 school years may be accessed at <http://beess.fcim.org/sppDistrictDocSearch.aspx>.
3. The technical assistance paper entitled **Guidelines for the Use, Documentation, Reporting, and Monitoring of Restraint and Seclusion with Students with Disabilities**, dated October 14, 2011, may be accessed at <http://info.fldoe.org/docushare/dsweb/Get/Document-6212/dps-2011-165.pdf>. This document provides guidance regarding the use, documenting, reporting and monitoring of restraint and seclusion of students with disabilities in school districts, including (a) when restraint or seclusion might be used, (b) considerations when selecting a training program for restraint, (c) what should be documented, (d) parent notification and reporting, and (e) monitoring use. It also contains information about s. 1003.573, F.S., Use of restraint and seclusion on students with disabilities.
4. The United States Department of Education, in collaboration with the United States Department of Justice, released **School Discipline Guidance** in the January 2014, Volume 4, Issue 1 of the **Office of Special Education Programs Monthly Update**. This package will assist states, districts and schools in developing practices and strategies to enhance school climate, and ensure those policies and practices comply with federal law. The resource documents listed below are included in the package, and are available at <http://www.ed.gov/school-discipline>.
 - **Dear Colleague** guidance letter on civil rights and discipline,
 - **Guiding Principles** document that draws from emerging research and best practices,
 - **Directory of Federal School Climate and Discipline Resources** that indexes federal technical assistance and other resources and
 - **Compendium of School Discipline Laws and Regulations** that catalog state laws and regulations related to school discipline.
5. **Functional Behavioral Assessment and Positive Intervention Benchmarks of Effective Practice** (Florida's PBIS Project) may be accessed at http://flpbs.fmhi.usf.edu/pdfs/pbs_FBA_Benchmarks.pdf.
6. **PS:Rtl Technology** may be accessed at <http://www.floridarti.usf.edu/index.html>. One function of this project provides regional technology coordinators and technology specialists the support to effectively implement accessible instructional materials, assistive technologies, learning technologies, and universal design for learning principles within all tiers of instruction. This project also manages, coordinates and supports the regional assistive technology loan libraries.

State Support Team for Putnam County School District

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