

BEFORE THE STATE SUPERINTENDENT OF PUBLIC INSTRUCTION

In the Matter of Newberg-Dundee)	FINDINGS OF FACT,
School District 29J)	CONCLUSIONS,
)	AND FINAL ORDER
)	Case No. 24-054-075

I. BACKGROUND

On December 13, 2024, the Oregon Department of Education (Department) received a written request for a special education complaint investigation from the parent (Parent) of a student (Student) residing in the Newberg-Dundee School District 29J (District). The Parent requested that the Department conduct a special education investigation under OAR 581-015-2030. The Department confirmed receipt of this Complaint and forwarded the request to the District.

Under state and federal law, the Department must investigate written complaints that allege violations of the Individuals with Disabilities Education Act (IDEA) and issue an order within sixty days of receipt of the complaint.¹ This timeline may be extended if the Parent and the District agree to the extension in order to engage in mediation or local resolution or for exceptional circumstances related to the complaint.²

On December 17, 2024, the Department's Complaint Investigator sent a *Request for Response (RFR)* to the District identifying the specific allegations in the Complaint to be investigated and establishing a *Response* due date of January 3, 2025.

The District submitted a *Response* on January 3, 2025, denying the allegations, providing an explanation, and submitting documents supporting the District's position. The District submitted the following relevant items:

1. Request for Complaint Investigation, 12/12/24
2. Daily Attendance Profile, 09/04-12/20/24
3. Student Discipline Profile, 10/01/19-11/18/24
4. Student Behavior Log, 09/19-12/19/24
5. Individualized Education Program (IEP), 02/22/24
6. IEP Signature Pages, 02/22/24
7. Special Education Placement Determination, 02/22/24
8. Prior Written Notice (PWN), 02/22/24
9. Partial Investigation Notes, 12/06-12/10/24

¹ OAR 581-015-2030(12) and 34 CFR § 300.152(a)

² OAR 581-015-2030(12) and 34 CFR § 300.152(b)

10. Investigation Notes, 11/19-12/06/24
11. Notes from Parent, 11/18-11/20/24
12. Incident Report, 11/18/24
13. Email, re: follow up, 11/20-12/19/24

The Parent submitted a *Reply* on January 12, 2025, providing an explanation, rebuttal, and documents supporting the Parents' position.

The Complaint Investigator interviewed the Parent and the District's Special Education Director on January 15, 2025. The Complaint Investigator reviewed and considered all of these documents, interviews, and exhibits in reaching the findings of fact and conclusions of law contained in this order. This order is timely.

II. ALLEGATIONS AND CONCLUSIONS

The Department has jurisdiction to resolve this Complaint under 34 CFR §§ 300.151-153 and OAR 581-015-2030. The Parent's allegations and the Department's conclusions are set out in the chart below. The conclusions are based on the Findings of Fact in Section III and the Discussion in Section IV. This Complaint covers the one-year period from December 14, 2023, to the filing of this Complaint on December 13, 2024.

Allegations	Conclusions
<p>When IEPs Must Be In Effect</p> <p>The Complaint alleged that on November 18, 2024 the District violated the IDEA by not providing special education and related services in accordance with the Student's IEP by debriefing with the Student the day of the incident and not debriefing "the following school day after an incident, in coordination with parental communication."</p> <p>(OAR 581-015-2220; 34 CFR §300.323)</p>	<p>Not Substantiated</p> <p>Based on the available information, there was not substantial evidence to suggest that the District failed to fully adhere to the Student's IEP on November 18, 2024.</p>

REQUESTED CORRECTIVE ACTION
<p>The Complainant requested the following corrective action:</p> <ul style="list-style-type: none"> • "Proper following of [the Student's] accommodations and our agreements. These are put in place to prevent escalations such as these to occur to further prevent suspension of school to prevent a loss in learning [<i>sic</i>]."

III. FINDINGS OF FACT

IDEA regulations limit complaint investigation to alleged violations occurring no more than one year before the Department's receipt of the special education complaint. This Complaint Investigation did not consider any IDEA violations alleged to have occurred before December 14, 2023. Any facts listed below relating to circumstances or incidents earlier than that date are included solely to provide the context necessary to understand the Student's disability and special education history.

1. The Student is twelve years old, in the seventh grade, and attends a middle school in the District.
2. The Student is eligible for special education services under the Other Health Impairment (OHI) category. The Student also has a medical diagnosis of Autism Spectrum Disorder but did not qualify educationally when evaluated.
3. The Student's strengths include self-advocacy, stating when there is a problem, and demonstrating interpersonal skills when working with peers on group projects. The Student is also described as being creative about solutions and able to think strategically. The Parent described the Student as creative, funny, animated, kind, thoughtful, and brave. They reported the Student loves to read, play the violin, play chess, and swim.
4. A 2024-25 School Student Discipline Profile report indicated five behavior incidents from December 13, 2023 through November 18, 2024. The violations and corresponding dispositions were listed:
 - a. December 13, 2024: physical aggression - conflict mediation/resolution.
 - b. April 4, 2024: theft - in-school suspension.
 - c. May 29, 2024: defiance [of] authority - loss of privileges.
 - d. October 22, 2024: disrespectful behavior - lunch detention.
 - e. November 18, 2024: disrespectful behavior and physical aggression - suspension.
5. A February 22, 2024 IEP indicated the following relevant information:
 - a. An FBA was completed on May 24, 2023 due to escalated behaviors in the classroom setting when given instruction, especially multi-step instructions, and escalated behaviors in unstructured situations such as recess. The Student reportedly responded to directions by "talking back," "cursing at the adult," or "leaving the room without permission." During unstructured activities, the Student would "engage in disruptive behaviors such as drawing inappropriate images, distracting peers, and sometimes hitting/kicking other students." It was also noted that the Student "has not demonstrated almost any of the behaviors [they] had in elementary school. [They] continue to need specially designed instruction and accommodations but not anywhere near the same degree."

- b. The Student's "anxiety and lagging self[-]regulation skills affect [their] involvement in the general education class and progress without accommodation and supports. [They] also need direct instruction on how [their] body is feeling when [they] become anxious, frustrated or unsure of what [they] should do."
- c. It was marked "yes" that the Student exhibited behavior that impeded their learning or the learning of others with the explanation, "Behavioral interventions and supports will be addressed in the accommodations/modification page of this IEP, along with the goals page. At this time, the team agrees that [the Student] no longer requires a behavior intervention plan."
- d. Behavior/Social Skills Goals:
 - i. "Given instruction, feedback and support, [the Student] will continue to identify [their] own needs and independently use the [listed] coping strategies in 7 out of 10 given opportunities as measured by teacher observation and daily tracker."
 - ii. "Given instruction, feedback and support, [the Student] will accept constructive and corrective feedback on assignments in 5 out of 10 given opportunities as measured by teacher report and daily tracker."
 - iii. "Given instruction, feedback and support, [the Student] will be able to demonstrate empathy by articulating or otherwise communicating how another person might be seeing or feeling about something in 8 out of 10 opportunities as measured by teacher observation and daily tracker."
- e. Specially Designed Instruction:
 - i. Social/Emotional, 60 minutes weekly, in the special education and regular education settings from February 23, 2024 through February 21, 2025 provided by the LEA general education and special education staff.
- f. Supplementary Aids/Services: Accommodations, from February 23, 2024 through February 21, 2025 provided by the LEA, general education, and special education staff including:
 - i. Communicate with the Student using a calm voice and acknowledging their feelings in all school settings for 5 minutes per instance.
 - ii. Utilize collaborative problem-solving methods when giving feedback in all school settings for 5 minutes per instance.
 - iii. "Processing time - allow more time to process what is being asked of [the Student] and to check for understanding. Ask a question, walk away, and give processing time" in all school settings daily.
 - iv. "Opportunity to debrief with [the Student] regarding behaviors or unmet expectations the following school day after communicating with parent so they can also communicate expectations" in all school settings for 10 minutes per instance.
 - v. Break space outside the classroom to process thoughts and help with regulation in all classes for 5 minutes per incident.
 - vi. Use positive reinforcements in all school settings for 2 minutes per instance.
- g. Supports for School Personnel: "Special Education Staff will confer regularly with General Education Teacher to exchange ideas and progress monitoring data to maximize [the Student's] learning support in the regular classroom setting. All teachers will follow the accommodations and modifications page of [the Student's] IEP for 30 minutes per month from February 23, 2024 through February 21, 2025."

- h. Educational Placement:
 - i. "Regular Education w[ith] Special Education push-in."
 - ii. "30-80% or more of day in regular classroom."
 - i. The Parent signed that they had the opportunity to participate in the development of the IEP and received a copy of the parent rights, IEP, and placement determination.
6. A PWN dated February 22, 2024, indicated an eligibility decision and noted that the Student "no longer has a Behavior Support Plan [(BSP)] in place. At this time, the team agrees that goals around lagging skills and accommodations will better support [the Student's] current needs."
 7. Behavior tracking data from September 19, 2024 through December 11, 2024 indicated 70 entries across 40 different dates. Different teachers utilized a 1-5 scale to rate the Student in expressing their needs, wants, and concerns in an appropriate manner, following school and classroom expectations, and demonstrating empathy for others. There were also columns to track if the Student took a break and for how long and to include one positive note from class for the day. The average and the mode of the data for expressing needs was five. The average and the mode of the data for following rules were four and five, respectively. The average and the mode of the data for showing empathy was five.
 8. An October 22, 2024 District Minor/Major Referral and Discipline Notice indicated the Student had demonstrated a "minor" infraction of "disrespectful behavior." The Parent was contacted on October 23, 2024, and the Student received lunch detention on October 24, 2024. In a written explanation, the Parent stated that the Student "was pulled into the office to investigate, discuss, and apply a lunch detention for the following day without prior parental contact. I was informed of the incident only at 2:55 p.m. via a phone call near the end of the school day. By this time, [the Student] had already been notified of the decision. This process excluded the opportunity for me to communicate expectations with [the Student] beforehand, as outlined in the accommodation."
 9. A November 18, 2024 District Minor/Major Referral and Discipline Notice indicated the Student committed a "major" infraction of "disrespectful behavior" and a "minor" infraction of "physical aggression/roughhousing." It stated that a debrief would occur on November 19, 2024 and a half-day suspension would occur November 18, 2024 with the Student to return to school on November 19, 2024. It noted that the Parent was contacted on November 18, 2024 at 1:30 p.m., and that the Student had orally presented their position on the incident.
 10. The Parent *Reply* described their view of the behavior incident on November 18, 2024, stating that the Student "was pulled into the office to discuss behaviors without prior parental communication. During the investigation, [the Student] shared [their] side of the story, which administrators reportedly disagreed with. [The Student] became upset and stated that [they were] repeatedly told to 'tell the truth,' escalating the situation into a verbal altercation. [The Student] received both a minor and major referral for this incident. The minor referral pertained to the initial behavior in question, while the major referral stemmed from the use of foul language directed at [the] administration during the discussion. The major referral

resulted in an out-of-school suspension and a text message requesting that I pick [them] up.” The Parent also noted that the Student was “calm” when they arrived at the School to pick up the Student. The Parent spoke with the Principal regarding the failure to follow the accommodation, “which was designed to prevent such situations” as the use of inappropriate language toward staff.”

The Parent also shared in their *Reply* that they were told the Student would participate in a “debriefing” with the administration and the other involved student the following day. However, according to the Student and their attendance data, they were not pulled into the office the next day. The Parent also stated, “Debriefing occurred the day of the incident without communicating to me first so that I was able to communicate expectations to [the Student] prior to admin/student debriefing. The accommodation is in place so that when incidents occur, communication is done with me first and then I follow up with [the Student] to prepare [them] for a conversation with [the] administration. This accommodation is in place to ensure escalations do not occur.”

11. A November 18, 2024 written account from the District regarding that day’s behavior incident indicated the following:
 - a. Incident: The Student and another student were entering the gym and “had hands on each other, arms around each other’s neck, and both physically interacting.”
 - b. The P.E. Teacher interviewed witnesses, and multiple students reported that both students “had hands on each other’s necks.”
 - c. According to video footage, the incident took place “just at/before 11:07:30.” Both students were seen walking together - “no observable altercations, students walked about halfway together before they split apart at 11:07:37 without observable incident and the Student went to lean/wait on the wall closest to the door by the commons.”
 - d. At 11:09:09, the Student reported to the P.E. Teacher.
 - e. At 12:10 p.m., the P.E. Teacher reported the incident via email to the Assistant Principal and the Parent.
 - f. At 12:34 p.m., the Assistant Principal and the P.E. Teacher interviewed the Student and the other student involved in the incident. The Student was “allowed to sit and process before being interviewed.” The Student was asked to share their perspective on what happened. When asked if they “put hands on the other student as was reported,” the Student allegedly became upset, using “disrespectful phrases,” yelling, and ripping up the referral paper. At this point, the two adults reportedly left the room to allow the Student “additional processing time (approximately 30 minutes)” while they interviewed the other student and additional student witnesses. “In those interviews, all students indicated that [the Student] and the other students [*sic*] both put hands on each other and were physically hurting each other in an unsafe manner.”
 - g. The Principal joined the room after the student interviews. As the Assistant Principal attempted to debrief the Principal, the Student interrupted to share their side of the story. The Student shared their frustration and insisted they did not “put [their] hands on the other student.” When the Assistant Principal referenced the testimonies of the P.E. Teacher and the other student, as well as the video footage, the Student disagreed and “escalated,” cursing at the Assistant Principal.

- h. At 1:09 p.m., the Principal texted the Parent, requesting a phone call regarding the incident. The Parent responded by asking to be called directly. The Principal explained the incident to the Parent over the phone, and the Parent agreed to pick up the Student.
 - i. When the Parent arrived, the Principal told them that the Student “was going to serve an out[-]of[-]school suspension for a physical altercation and extreme disrespect toward an adult ... [The Principal] shared that they would be debriefing with [the Student] when [the Student] returned the next day and that the incident would be marked as a minor referral.”
 - j. The Parent asked to speak to the Principal privately and asked if the IEP had been followed because they were concerned the Student had not received processing time. It was explained that the Student had “processing time throughout the interview process, and the interview was not conducted until an hour after the incident occurred.”
 - k. “The IEP was followed. The process of debrief[ing] is planned with [the Student] and another student on 11/19. The parent was contacted as soon as possible - after administration focused on safety of [the Student], the other student, students, and staff.”
 - l. “Accommodations on [the Student’s] IEP were followed ... ”
 - m. “Discipline did not occur in the moment. The administrator met with [the] student to investigate, ask questions, and to determine the safety of all involved. [The Student] was not emotionally elevated and agreed that [they were] ready to talk.”
 - n. “Interview took place 1 hour after the incident. [The Student] followed [their] schedule and had lunch with [their] peers. The interview was conducted by [the] administration who were not involved in the incident.”
12. On November 18, 2024, the Parent emailed the Principal, summarizing their phone and in-person conversation and timeline of events regarding the behavior incident and disciplinary decisions of the same date. The Parent stated they did not believe the Student’s IEP had been followed because:
- a. Based on the IEP, the Student was supposed to have a debriefing opportunity the day following an incident in “coordination with parental communication” but did not receive that opportunity. The Parent stated, “This procedure was not followed, and I believe it contributed to the escalation of the situation, ultimately resulting in the inappropriate language and the subsequent suspension.”
13. An attendance detail report for November 18, 2024 showed “suspension absence” for the Student’s 4th, 5th, and 6th-period classes and a school departure time of 1:00 p.m. An attendance detail report for November 19, 2024 showed no class absences throughout the day. The Parent stated that this indicated the Student had not been pulled from class to participate in a debriefing of the previous day’s incident as agreed upon.
14. A November 20, 2024 email from the Principal to the Parent indicated details from the gym camera on the day of the incident as previously recorded in this report, with the added note, “The camera angle did not allow viewing of the actual incident that happened at the fitness door going into the gym. Teacher was at the door as students lined up and were walking out to the gym.”

15. In a December 10, 2024 and December 12, 2024 email exchange between the Parent and a District Representative, the November 18, 2024 incident and decision were discussed. The Parent stated again that they did not see how the IEP accommodation regarding debriefing behavior incidents the following day after communicating with the Parent had been met. The District Representative responded, “[The Principal] stated that you and [they] met when you came to pick up [the Student] and [the Principal] shared the incident details and expectations with you. [They] also indicated that follow[-]up took place upon [the Student’s] return the next day.”
16. On December 12, 2024, the Parent filed this Complaint.
17. During an interview with the Complaint Investigator, the Parent emphasized that they specifically requested the parental communication component be included in the Student’s IEP accommodation because “I wanted to make sure that they were adhering to that component because if situations or incidents are not discussed or brought up in a specific way with [the Student], it could lead to an escalation and I’m trying to prevent that.” They also stated, “If there’s an incident, surely you can investigate, but there’s not going to be a discussion further with [the Student] regarding whose fault, punishment, or even remedial meeting ... until I’ve been updated, and I’ve had the opportunity to talk with [the Student].” They further explained the intent was to help prepare the Student for those conversations and ensure they were calm and regulated to make the conversations more effective and to avoid escalated behavior and suspensions.

The Parent also described the District’s response to other behavior incidents this school year. They said the Student had demonstrated minimal behavior incidents since entering middle school, so there were few situations where the accommodation was not followed. However, there was an incident in October 2024 where the Student said they were pulled into the office to discuss throwing a milk carton in the cafeteria. The Student claimed they were shown video footage of the incident and then, when they got upset, were warned to calm down or they would be sent home. The Student was assigned lunch detention for the following day, and then the Parent was notified of the incident via email. The Parent did not believe the District followed the IEP accommodation around debriefing for this incident but chose not to pursue it at the time.

The Parent stated their understanding of a debrief was “discussing a situation in detail with the Student and asking questions for clarification.” They said, “The District is stating that they followed the accommodation by talking to [the Student], but not talking to [them] about what was going to happen, which is going against [the Student’s] statement.” The Parent further stated that the District claimed they would debrief with the Student the following day, so the Parent prepped the Student about what to expect. However, according to the Student, no one pulled them from class to discuss the incident the next day, and the Parent believed their attendance record from that day verified this. Therefore, the Parent believed there were discrepancies between what the District was saying and what the Student reported to the Parent.

18. During an interview with the Complaint Investigator, a District Representative recounted the November 18, 2024 incident and said that after hearing about the alleged altercation between the students, the Assistant Principal approached the Student and notified them they wanted to “have a conversation and follow[-]up with [them] regarding what happened in P.E. class - that [the Assistant Principal] didn’t want to pull [the Student] in right away.” The District Representative said the Student was given time to process and think before being interviewed. Then, when the Student escalated during the interview, they were allowed to “de-escalate and sit per [their] accommodations in the IEP.” The District Representative said the Parent was contacted after the Student became escalated twice and used “extreme profanity directed toward” the Assistant Principal. They explained that the purpose of the Principal asking the Parent to come in was to communicate “what had occurred and what the expected behaviors and outcomes were,” as the IEP accommodation states.

The District Representative also stated that following the half-day suspension on November 18, 2024, the Student was expected to return the next day so that an administrator could debrief the incident with them and the other student involved. However, they said the Student did not come to school the next day. The District Representative stated that when the Student did return to school, the Assistant Principal told them they would be debriefing later that day and the Student allegedly responded, “I’m not talking to you. My mom’s going to file a complaint.” Therefore, the District Representative said there was no further conversation with the Student about the incident after that.

The District Representative concluded, “The Parent is contesting ... that the administrators did not debrief with [the Parent] and the Student prior to interviewing [the Student]. ... Administrators reserve the right, school educators reserve the right, to have a conversation and interview students without parents being present or parent notification. I think [the Parent] might be looking at that incident as a debrief and not an interview, which is what took place.”

19. A Daily Attendance Profile report printed on January 2, 2025 indicated three absences for the 2024-25 school year:
- November 5, 2024 (late arrival to school),
 - November 18, 2024 (suspension after 1:00 p.m.), and
 - December 20, 2024 (excused absence).

IV. DISCUSSION

When IEPs Must Be In Effect

The Complaint alleged that on November 18, 2024, the District violated the IDEA by not providing special education and related services in accordance with the Student’s IEP by

debriefing with the Student the day of the incident and not debriefing “the following school day after an incident, in coordination with parental communication.”

At the beginning of each school year, a school district must have in effect an IEP for each child with a disability within the district’s jurisdiction. School districts must provide special education and related services to a child with a disability in accordance with an IEP.³ Each school district must ensure that the IEP is accessible to each regular education teacher, special education teacher, related service provider, and other service provider who is responsible for its implementation, and inform each teacher and provider of their specific responsibilities for implementing the child’s IEP and the specific accommodations, modifications, and supports that must be provided for or on behalf of the child in accordance with the IEP.⁴

District School Board Policy regarding student conduct states, “Careful attention shall be given to procedures and methods whereby fairness and consistency in discipline shall be assured [to] each student. The objectives of disciplining any student must be to help the student develop a positive attitude toward self-discipline, realize the responsibility of one’s actions and maintain a productive learning climate. All staff members have responsibility for consistency in establishing and maintaining an appropriate behavioral atmosphere.”⁵

The District Staff/Student Handbook outlines the student discipline process, including that upon violations, a staff member will describe the inappropriate behavior, and provide an opportunity for the student to be heard. The handbook also outlines variations regarding parent notification at different levels of violation. Also noted is, “Each student who is being provided educational services through an [IEP] is subject to district discipline regulations unless, as provided by law, specific behavioral concerns are addressed as part of the student’s IEP.”⁶

The Student’s records indicated a previously completed FBA regarding escalated behaviors, particularly in unstructured activities or areas. However, the current IEP and behavior tracking data noted that since transitioning to middle school, the Student had not demonstrated behaviors to the same degree as before. Therefore, there was no longer a behavior intervention plan required, but there were goals and accommodations to address behavior support needs.

The Student’s behavior/social skills goals addressed the Student identifying their own needs and independently using given coping strategies, accepting constructive or corrective feedback on assignments, and demonstrating empathy for others. The specifically related accommodation brought forth in this complaint was an “Opportunity to debrief with [the Student] regarding behaviors or unmet expectations the following school day after communicating with parent so they can also communicate expectations.”

There was an alleged physical altercation between the Student and another student on November 18, 2024. Following this incident, the School’s administrative staff interviewed the

³ OAR 581-015-2220; 34 CFR §300.323

⁴ OAR 581-015-2220; 34 CFR §300.323

⁵ District School Board Policy JFC - Student Conduct, 10/10/17

⁶ District Staff/Student Handbook, [20]23-24, P86

Student and the other student on the same day as the alleged altercation. They contacted the Student's Parent after the Student's behavior escalated during the interview. The Student was suspended for the remainder of the day. The District then claimed to have attempted a debriefing the following day, but the Student reportedly refused.

The Parent's position was that the District did not follow the IEP accommodation by conducting the interview on the same day as the incident without prior parental contact. The Parent believed this alleged lack of adherence to the IEP contributed to the Student's escalation and subsequent suspension. The Parent agreed that the District could investigate an incident that occurred, but any further discussion regarding fault, consequences, or remediation was supposed to occur the next day after the Parent had an opportunity to talk with and prepare the Student, per the IEP accommodation. The Parent also claimed the District did not conduct a debriefing the following day as promised.

The District's position was that they believed they followed the IEP while also exercising their right as school administrators to investigate incidents that pertain to the safety of students or staff. The District claimed the conversation with the Student about the incident was an "interview" to investigate the incident. They reported that the interview did not occur right away, and the Student was given an hour's notice that it would occur. Also, at the time of the interview, the Student reportedly did not appear emotionally escalated and indicated they were ready to talk.

While the Student had behavior/social skills goals and accommodations to address lagging skills, there was no behavior intervention plan or other IEP documentation outlining different or specific disciplinary actions or processes to be followed for the Student. Therefore, processes and procedures outlined in District discipline policies were implemented accordingly. The District claimed they attempted to debrief the Student the next day, but the Student was absent, and then on the following day, upon returning, the Student refused to engage in a debriefing session. The Parent and the Student deny this happened. The attendance records provided show the Student was present at school all day on November 19, 2024 with no absences. Whether an attempt was made to debrief the following day was unclear, with conflicting accounts and evidence.

Based on the available information, there was not substantial evidence to suggest that the District failed to fully adhere to the Student's IEP on November 18, 2024. However, it is clear that the District and the Parent have differing interpretations of the wording of the IEP accommodation regarding "debriefing." It is recommended that further communication occur between the District and the Parent to establish clarity regarding disciplinary action and debriefing related to behavior incidents and clearer protocols for contacting the Parent.

The Department does not substantiate this allegation.

VII. CORRECTIVE ACTION
In the Newberg School District
Case No. 24-054-075

The Department does not order corrective action in this matter.

Dated: this 10th Day of February 2025

A handwritten signature in cursive script that reads "Ramonda Olaloye".

Ramonda Olaloye
Assistant Superintendent
Office of Enhancing Student Opportunities

E-mailing Date: February 10th, 2025

Appeal Rights: Parties may seek judicial review of this Order. Judicial review may be obtained by filing a petition for review within sixty days from the service of this Order with the Marion County

Circuit Court or with the Circuit Court for the County in which the party seeking judicial review resides. Judicial review is pursuant to the provisions of ORS § 183.484. (OAR 581-015-2030 (14).)