

**BEFORE THE
OFFICE OF ADMINISTRATIVE HEARINGS
STATE OF CALIFORNIA**

In the Matter of:

CLAIMANT

v.

SAN DIEGO REGIONAL CENTER

OAH No. 2022030864

DECISION

Jami A. Teagle-Burgos, Administrative Law Judge, Office of Administrative Hearings, State of California, heard this matter by videoconference on May 17, 2022.

Bridgette Webster, Attorney at Law, represented San Diego Regional Center (SDRC).

Kasey Howell, authorized representative, represented claimant, who was present.

Oral and documentary evidence was received. The record was closed, and the matter submitted for decision on May 17, 2022.

ISSUE

Is SDRC required to continue funding claimant's RDI service provided by TAG?

SUMMARY

Claimant's IPP provides that he is entitled to receive RDI services. TAG has been the vendored provider for claimant's RDI services since 2018. TAG's RDI service was initially within its program design and approved by SDRC under Service Code 102. However, upon review in 2022, SDRC discovered that the RDI services provided by TAG no longer encompassed TAG's program design for RDI because TAG no longer included parent/caregiver training. The evidence of record, including TAG's RDI progress notes for claimant and witness testimony, demonstrates that the RDI services TAG rendered can no longer be billed under SDRC's Service Code 102 because there is no firm and clear component of parent/caregiver training. As such, claimant's appeal for SDRC to continue to fund TAG's RDI services is denied.

FACTUAL FINDINGS

Procedural History

1. Claimant qualifies for regional center services based on a diagnosis of Autism Spectrum Disorder (ASD).

2. According to claimant's Individual Program Plan (IPP), dated April 16, 2019, claimant is receiving Relationship Development Intervention¹ (RDI) "therapy and is working on furthering development as an effective communicator with his sister."

3. On March 10, 2022, SDRC sent claimant a Notice of Proposed Action (NOPA) that funding for Therapeutic Approach to Growth's (TAG) RDI program will end, effective April 30, 2022. SDRC gave this reason for the action: "The service is outside of the vendors program design. What is being provided is not RDI, and is not an evidence-based practice."

4. On March 22, 2022, claimant filed a fair hearing request. In the request, claimant stated, "I disagree with the San Diego Regional Center's (SDRC) decision to discontinue services through Therapeutic Approach to Growth's (TAG) RDI Program."

5. This hearing followed.

Claimant's April 16, 2019, IPP

6. Claimant's IPP, dated April 16, 2019, indicates that he lives with his sister, XXXXXX, and they eat breakfast together at a café, once a week, "to continue to build a meaningful interaction with one another." The IPP reported claimant is "receiving RDI therapy and is working on furthering development as an effective communicator with

¹ RDI is a therapy program designed to ameliorate the effects of ASD. In a January 11, 2010, article by Amy Leventhal, Ph.D., and Deborah Borrang, M.Ed., the purpose of RDI is described as to "develop intersubjectivity," which "encompasses joint attention, social referencing, theory of mind, social reciprocity, and communication for experience sharing purposes."

his sister." Outcome #3 in his IPP is to "increase his understanding of social interactions through January 31, 2022," whereby his sister XXXXXX "will participate with [claimant] in appropriate therapeutic services as needed"; and "service/funding" for the appropriate therapeutic services is already in place per purchase of services guidelines. Claimant's progress for Outcome #3 is as follows: "[Claimant] has made progress on understanding the importance of social interactions and continues to work on this during RDI therapy. This outcome will continue."

7. The other outcomes in claimant's IPP were competitive employment and obtaining a driver's license. For competitive employment, his SDRC social coordinator "will provide information on the Department of Rehabilitation [and] request TDSO as needed per POS guidelines." For learning to drive and obtaining his driver's license, his SDRC service coordinator "will request funding for Independent Living Services per POS guidelines."

RDI

8. In an article titled *Evaluation of the Relationship Development Intervention Program*, by Steven E. Gustein, Audrey F. Burgess, and Ken Montfort, published by SAGE Publications on behalf of The National Autistic Society, in October 2007, RDI is described as "a parent-based, cognitive-developmental approach, in which primary caregivers are trained to provide daily opportunities for successful functioning in increasingly challenging dynamic systems."

TAG's RDA

9. On June 18, 2018, Amy Olts, an RDI Certified Consultant for TAG conducted a Relationship Development Assessment (RDA) for claimant when he was 20 years old. His measurable goals were:

By November 30, 2018, [claimant] will develop in his ability to effectively communicate and self-advocate during weekly meetings with his sister. He will learn how to be an active and respectful listener. Furthermore, he will gain an understanding of how to share how he is feeling, his perspective, and propose a suggestion toward a goal. . . .

10. Claimant's other measurable goals involved him identifying the main stressors in his life; developing his ability to use dynamic thinking to approach real world challenges; developing in the area of self-awareness by considering what brings him joy, etc.; and learning how to set short term goals and planning for attaining them.

TAG's RDI Progress Report

11. A TAG RDI progress report for claimant, dated April 19, 2022, was prepared by Ms. Olts. He was 24 years old. Claimant's measurable goals were: (1) claimant will develop in the areas of prioritizing and planning by submitting RDI assignments on time – he has exceeded this goal as of April 19, 2022; (2) claimant will participate in evaluating his current job and position – he is close to mastery of this goal as of April 19, 2022; (3) when claimant becomes aware of an emotion he is experiencing, he will internally identify the feeling, pause, and consider why he may be feeling that way – he has met this goal as of April 19, 2022; and (4) claimant will obtain his driver's license by May 31, 2022 – he has not met this goal as of April 19, 2022.

SDRC's Request to TAG For a Corrective Action Plan

12. In a letter to TAG on March 23, 2022, SDRC requested that TAG submit a Corrective Action Plan within 30 days because SDRC staff had met with TAG "on several occasions" regarding concerns about how TAG implemented services in its RDI

program design under Service Code 102. TAG submitted a revised program design that SDRC denied because the new design did not fall within the RDI guidelines. SDRC notified TAG that it needed to “come into compliance with” its contract with SDRC, and that TAG had “been operating outside of the scope” of the program design that SDRC had approved for RDI services. The letter outlined four examples of how TAG was operating outside the scope of its program design for RDI services: (1) irregular reporting of clients’ progress to SDRC; (2) providing services for behavioral/mental health issues that are outside of the TAG program design and are not a component of RDI which does not include a behavioral or mental health component; (3) providing services in settings in which the parents are not participating in RDI; and (4) providing services in venues for which SDRC would not pay for services such as school meetings, or residential placements.

13. SDRC’s request for TAG to submit a Corrective Action Plan also included an attachment with 22 specific incidents of how it violated its program design for RDI services. One of the examples involved claimant, and stated:

TAG provided a report for [claimant] dated 10/18/21.

According to the report, the RDI consultant is working with the individual directly with no parent involvement. During a meeting with TAG and the SDRC, your staff indicated the RDI consultant “takes the place of the parent” in his services. We believe the service is outside the scope of RDI and your program design as RDI is a parent training service. Our client is 23 years of age and has been receiving RDI services for 4 years, 6 months.

SDRC's Case Note

14. A case note by SDRC on October 28, 2021, indicates claimant was in his ninth six-month contract for RDI services with TAG as the vendor, and this was the "final contract to allow family to transition as total amount of contracts have been met, per program design for this parent training program."

Testimony of Melissa Melgar, SDRC Coordinator of Behavioral Services

15. Melissa Melgar, SDRC Service Coordinator, testified at the hearing and the following is a summary of her testimony. She has worked in the field of behavioral services for 14 years and worked at SDRC for 5 years as the coordinator of behavioral services. She has a Master's Degree in Psychology and is a board-certified behavioral analyst. She explained that a vendor must comply with the regulations and conditions of their contract with SDRC, otherwise, SDRC may terminate a vendor's payment for services. A vendor submits a program design that indicates everything they will do as part of their service, and a length of time for their program.

16. TAG's program design for RDI is to provide services to a SDRC client for four and a half years, and every six months a new contract is issued to TAG for a SDRC client. TAG is a vendor for SDRC under Service Code 102, which is for individual and family training, and such services cannot exist under a different service code. TAG has been providing RDI services to claimant for five years, as his RDI services were extended for a brief time. TAG is still providing RDI services to claimant but they are outside the scope of Service Code 102. For example, the goals Ms. Olts outlined in April 2022 include that claimant is to evaluate his job and obtain a driver's license. These goals fall under a different service code. In 2018, Ms. Olts set forth a goal for

claimant to communicate and self-advocate at meetings with his sister, which is considered to be an appropriate RDI service. However, this goal is no longer a part of the 2022 goals as outlined by Ms. Olts. SDRC's last case note for claimant indicated the total amount of contracts with TAG had been met in accordance with its program design for RDI. Ms. Melgar explained the goal of RDI is to train parents and/or caregivers who eventually "take over the goals." She noted that aside from the two goals not being appropriate (evaluation of job and obtain a driver's license), claimant had met or exceeded his two other goals. In November 2021, Ms. Melgar became aware of the problems with TAG's RDI services for claimant and she informed TAG at that time. While claimant has "made progress and benefited greatly" from TAG's RDI services, some of his goals have been met and other goals simply do not fall under the service code for RDI services. She also remarked that all of SDRC's consumers are "empowered to make choices, but SDRC has to follow all the rules and regulations and not cherry pick certain statutes."

Testimony of Mark Gates, SDRC Program Manager

17. Mark Gates, SDRC Program Manager, testified at the hearing and the following is a summary of his testimony. He obtained a master's degree in social work in 1986, and he has worked as a Program Manager at SDRC for 22 years. He typically supervises 12 service coordinators. He supervises the service coordinator assigned to claimant, and he is aware of the issues with TAG's RDI program. Claimant's goal of obtaining a driver's license is covered under SDRC Service Code 520 - independent living skills/training – and SDRC has vendored providers for this service code who will assist claimant in obtaining and reviewing a driver's license study guide. Claimant's employment goal is covered under SDRC Service Code 510 – tailored day service option (TDSO) through an adult development center – where a vendor would provide

“one-to-one service,” and it is also covered under SDRC Service Code 952 – supported employment-individual – which is also a “one-to-one service” and can assist with employment. Mr. Gates indicated that SDRC has vendors who provide services for consumers under these service codes, and that SDRC can provide these services to claimant through vendorized providers under these appropriate service codes.

18. Mr. Gates explained that regional centers exist through a contract with Department of Developmental Services (DDS) who ensures that regional centers are in compliance with the pertinent laws and regulations, and can require that regional centers come into compliance. DDS conducts audits of regional centers’ payment to vendors, and ensures that appropriate Service Codes are billed for vendors’ services. Regional centers and/or DDS may recover funds paid to vendors when it is determined that services were not provided in accordance with regional center’s contract or services were not provided within the applicable laws and/or regulations. If DDS were to review the billing of TAG’s RDI services for claimant, DDS would find a violation of the law because the services are not being properly billed under Service Code 102.

Claimant’s SDUSD Triennial Assessment Report

19. When claimant was 18 years old and in his senior year of high school, San Diego Unified School District issued a Mental Health Related Service Triennial Assessment Report, dated April 26, 2016. The report noted that claimant was initially qualified for special education in ninth grade due to emotional disturbance related to “low mood, verbal aggressions and poor social skills.” He was being treated weekly by a psychiatrist at UCSD who managed his medications. The report identified a single social-emotional goal as being “identifying emotions.”

Claimant's Psychological Evaluation

20. Uri Kugel, Ph.D., conducted a psychological evaluation on March 10, 2017, when claimant was 19 years old. The evaluation reported that claimant's early life was "chaotic" as his parents were recovering alcoholics, his parents separated when he was three years old, and his father passed away when he was nine years old. Due to his mother's problems with alcohol, he moved in with his sister, XXXXXX, when he was 15 years old, and she became his guardian. His individualized education program (IEP) in tenth grade found he had a primary designation of ASD and a secondary designation of emotional disturbance. He graduated from high school in 2016 with a 3.5 GPA. Dr. Kugel determined claimant's full-scale IQ was 121, which ranked in the 92nd percentile and was considered to be "very high." On the Gilliam Autism Rating Scale – Second Edition, claimant had a score of 95, which indicated a "very likely" probability of ASD. Dr. Kugel's diagnostic impression of claimant was: "Autism Spectrum Disorder, Level 2 Social Communication, Level 1 Restricted, repetitive behaviors, without Intellectual Impairment, without Language Impairment."

TAG's Employee Roster and Staff Education

21. Claimant submitted a roster of RDI consultants for TAG, as of May 2022, which includes Ms. Olts and several other RDI consultants who combined hold various bachelor's and master's degrees.

TAG's RDI Rates

22. Claimant submitted a document purporting to show the rate TAG charged for RDI services (\$125 each hour, 5 hours each month, total of \$625 each month) versus the rates charged by Applied Behavioral Analysis (ABA) providers (\$50 per hour, 8 hours each week, total of \$400 each week; and \$150 each hour, 1 hour

each week for supervision and 1 hour each week for parent training, total of \$2800 each month).

Claimant's Challenges and Core Differences

23. In an email on May 11, 2022, Ms. Olts, RDI consultant, identified claimant's "challenges and core difference" as follows: dynamic analysis, experience sharing, episodic memory, creative and flexible problem solving, and self-awareness.

Testimony of Amy Olts, RDI Consultant

24. Amy Olts testified at the hearing and the following is a summary of her testimony. She holds a bachelor's degree in psychology from Cornell University and a master's degree in counseling. She has been a certified RDI consultant with TAG since 2008. She is not licensed by the State of California as a clinical psychologist. She began working with claimant in June 2018. RDI targets core challenges specifically related to autism – self-awareness, communication, and dynamic analysis - and supports individuals to be able to have a quality of life. RDI sets goals such as meaningful employment, friendships, contribution to society, and ability to speak for one's self. These goals relate back to the core challenges related to autism.

25. Ms. Olts explained claimant recognizes when he is "dysregulated," and his "environmental cues and past experiences." He is moving towards challenges in a "way that he has not in the past." He is doing "new opportunities" such as being an onsite property manager at his apartment complex, house sitting, and dog sitting. He has also participated in volunteer opportunities. When a "goal" has been met this is very different from the "concept" being met. RDI services is "creating little bite size chunks that [claimant] can work toward to make progress in that conceptual area."

TAG is targeting the core challenges related to autism by working on the “root cause for the stress and anxiety . . . and the natural response is for the anxiety to decrease.”

26. Ms. Olts indicated she meets directly with claimant; and she used to occasionally meet with claimant’s sister but no longer meets with her on a regular basis. It was claimant’s goal to “effectively communicate and self-advocate during weekly meetings with his sister.” The weekly meetings between claimant and his sister were in their home to discuss issues and connect together on those issues. Claimant’s goal to obtain a driver’s license “has to do with more steps that have to do with getting the driver’s license.” Claimant did reach out to SDRC for support on this goal, and SDRC provided him with website links for non-vendors that he would have to pay out of pocket. Claimant’s goal concerning his employment was not about “getting the job,” it was about the pros and cons about the company where he works now. Ms. Olts would be willing to reduce or modify a goal for claimant, but she was never asked by SDRC to “adjust the goals.” If there was a concern about “who was meeting,” she would have clarified there were “weekly meetings between [claimant] and his sister.” TAG is doing its best to “abide by the law” and do what is “best for its client.”

27. On cross-examination Ms. Olts was asked if she has ever been a licensed clinical psychologist in the State of California, and she replied “no.” TAG works on the “core challenges of autism.” She does not write goals indicating she is “working on a mental health issue.” The goals for clients relate to “anxiety reduction” but do “not treat anxiety directly.” In response to SDRC’s counsel indicating SDRC has a concern that TAG is providing “mental health services by unlicensed providers,” she responded that she is “not providing mental health services but . . . addressing the underlined issues related to autism for which anxiety-reduction is a byproduct.”

TESTIMONY OF XXXXXX XXXXXXXX, SISTER OF CLAIMANT

28. XXXXXX XXXXXXXX, claimant's sister, testified at the hearing and the following is a summary of her testimony. She was 29 years old when claimant came to live with her in 2015. He was 15 years old at the time. She had no prior experience in looking for services for him. When he moved in with her, claimant "did not have any hope for himself, did not want to live anymore, and could not handle stress and disagreement." She had always suspected that "something was going on" after many years of trying different things. He became eligible for SDRC services in 2017 due to his new autism diagnosis. She was relieved for the diagnosis because there was "finally an explanation and name to what was going on." Claimant had tried several therapists and a psychologist who were not able to connect with him. Claimant's SDRC service coordinator recommended that TAG provide with RDI services. Claimant's SDRC service coordinator came to his house and together they called his health insurance company – they got a denial over the phone from the insurance company. Thereafter, SDRC approved TAG to provide claimant with RDI services. She is not aware if ABA services were recommended for claimant.

29. Ms. XXXXXXXX reported that when she and claimant became connected with Ms. Olts, she saw Ms. Olts as "someone else who valued [her] brother and someone he felt safe with." She stated, "You have no idea when there is someone else who sees his potential . . . now he can manage our apartment complex . . . RDI has given my brother a chance to really experience joy and fulfillment in this life." She is "grateful" to Ms. Olts who has a "always been there for [her] and always helps . . . to best guide [her] brother." Ms. XXXXXXXX's testimony was credible and sincere.

TESTIMONY OF CLAIMANT

30. Claimant testified at the hearing and the following is a summary of his testimony. When he moved in with his sister, he told her that he would “give life one last shot.” She found him the “best psychologist” in San Diego, Dr. Tanaka, who got him on the “right tack” with medications but unfortunately retired. His sister said they were “going to try out” TAG’s RDI services. He initially had an RDI consultant who changed jobs, so he was then assigned to Ms. Olts. It took him about one year to “connect” with her. He is 23 years old now. He would like to continue receiving RDI services. He does not really need “job support or anything like that,” and the “whole driver’s license” goal was because he had requested assistance with driver’s training, but SDRC told him they did not provide that service. He has learned strategies through TAG’s RDI services, and he gave an example of an incident when he spilled juice on his shirt and called his sister to bring him a different shirt but she could not help because she was at work. He thought of a skill Ms. Olts taught him to “calm down” and thought to himself that “it could be worse, there were other things” and he “problem solved” and turned his shirt inside out but made sure the tag was on the back. Claimant’s testimony was credible and sincere.

LEGAL CONCLUSIONS

Burden and Standard of Proof

1. In a proceeding to determine whether an individual is eligible for services, the burden of proof is on the claimant to establish by a preponderance of the evidence that IRC should fund the requested service. (Evid. Code, §§ 115, 500; *McCoy v. Bd. of Retirement* (1986) 183 Cal.App.3d 1044, 1051-1052.)

The Lanterman Act

2. The Legislature enacted a comprehensive statutory scheme known as the Lanterman Developmental Disabilities Services Act (Welf. & Inst. Code, § 4500 et seq.) to provide a pattern of facilities and services sufficiently complete to meet the needs of each person with developmental disabilities, regardless of age or degree of handicap, and at each stage of life. The purpose of the statutory scheme is twofold: to prevent or minimize the institutionalization of developmentally disabled persons and their dislocation from family and community, and to enable them to approximate the pattern of everyday living of nondisabled persons of the same age and to lead more independent and productive lives in the community. (*Assn. for Retarded Citizens v. Dept. of Developmental Services* (1985) 38 Cal.3d 384, 388.) Welfare and Institutions Code section 4501 outlines the state's responsibility for persons with developmental disabilities and the state's duty to establish services for those individuals.

3. Welfare and Institutions Code section 4512, subdivision (b) defines "services and supports" as:

[S]pecialized services and supports or special adaptations of generic services and supports directed toward the alleviation of a developmental disability or toward the social, personal, physical, or economic habilitation or rehabilitation of an individual with a developmental disability, or toward the achievement and maintenance of independent, productive, normal lives. The determination of which services and supports are necessary for each consumer shall be made through the individual program plan process. The determination shall be made on the basis

of the needs and preferences of the consumer or, when appropriate, the consumer's family, and shall include consideration of a range of service options proposed by individual program plan participants, the effectiveness of each option in meeting the goals stated in the individual program plan, and the cost-effectiveness of each option . . .

Nothing in this subdivision is intended to expand or authorize a new or different service or support for any consumer unless that service or support is contained in his or her individual program plan.

4. DDS is the public agency in California responsible for carrying out the laws related to the care, custody and treatment of individuals with developmental disabilities under the Lanterman Act. (Welf. & Inst. Code, § 4416.) In order to comply with its statutory mandate, DDS contracts with private non-profit community agencies, known as "regional centers," to provide the developmentally disabled with "access to the services and supports best suited to them throughout their lifetime." (Welf. & Inst. Code, § 4620.)

5. A regional center's responsibilities to its consumers are set forth in Welfare and Institutions Code sections 4640-4659.

6. Welfare and Institutions Code section 4646 requires that the IPP and provision of services and supports be centered on the individual and take into account the needs and preferences of the individual and family. Further, the provision of services must be effective in meeting the IPP goals, reflect the preferences and choices of the consumer, and be a cost-effective use of public resources.

7. Welfare and Institutions Code section 4648 requires regional centers to ensure that services and supports assist individuals with developmental disabilities in achieving the greatest self-sufficiency possible and to secure services and supports that meet the needs of the consumer, as determined by the IPP. This section also requires regional centers to be fiscally responsible.

8. In implementing IPPs, regional centers are required to first consider services and supports in natural community, home, work, and recreational settings. (Welf. & Inst. Code, § 4648, subd. (a)(2).) Services and supports shall be flexible and individually tailored to the consumer and, where appropriate, his or her family. (*Ibid.*)

9. A regional center is authorized to purchase services and supports for a consumer pursuant to vendorization or a contract in order to best accomplish all or any part of the IPP. (Welf. & Inst. Code, § 4648, subd. (a)(3); Cal. Code Regs., tit. 17, § 50612, subd. (a).)

10. Welfare and Institutions Code section 4646.4, subdivision (a), requires regional centers to establish an internal process that ensures adherence with federal and state law and regulation, and when purchasing services and supports, ensures conformance with the regional center's purchase of service policies.

11. The regional center is required to consider all the following when selecting a provider of consumer services and supports: a provider's ability to deliver quality services or supports to accomplish all or part of the consumer's individual program plan; provider's success in achieving the objectives set forth in the individual program plan; the existence of licensing, accreditation, or professional certification; cost of providing services or supports of comparable quality by different providers;

and the consumers, or, where appropriate, the parents, legal guardian, or conservative of a consumer's choice of providers. (Welf. & Inst. Code, § 4648, subd. (a)(6).)

Evaluation

12. The evidence established that SDRC may discontinue funding TAG's RDI services for claimant under Service Code 102.

13. In this case, SDRC argues Service Code 102 is not appropriate because TAG is no longer including parent/caregiver training in its RDI services for claimant. The parent/caregiver training is the integral component of RDI and included in TAG's RDI program design with SDRC. The program design called for a four-and-a-half year contract for each client, and claimant has received five years of RDI services. TAG's RDI progress notes for claimant referenced a parent/caregiver component early in 2018. However, there appears to be a very long gap in the parent/caregiver training because it was not referenced again until Ms. Olts noted it several years later in 2022 by mentioning claimant and his sister engaged in "weekly meetings" at a café. Aside from this note, there is no indication TAG was performing any parent/caregiver training directly involving claimant's sister. In fact, Ms. Olts testified that she would meet directly with claimant, and she no longer met with claimant's sister. TAG's RDI program design, as submitted by TAG, and testified to by Ms. Melgar and Mr. Gates, calls for parent/caregiver training in order for SDRC to render payment to TAG for RDI services under Service Code 102. As such, the apparent lack of parent/caregiver training results in the determination that SDRC must terminate funding TAG's RDI services for claimant.

14. Of note, SDRC's program coordinator, Mr. Gates, offered for SDRC to provide vendorized services – under the appropriate service codes - to claimant for his

goals involving employment and obtaining a drivers license. The goal of obtaining a driver's license falls under SDRC's Service Code 520 for "independent living skills training"; and the employment goal falls under Service Code 510 for "TDSO" through an "adult development center" and Service Code 952 for "supported employment-individual." While Ms. Olts reported that claimant had called SDRC for help to obtain his driver's license and he was given website links for non-vendored providers who charged fees, and it was not until this hearing that a SDRC representative – Mr. Gates – offered to assist claimant with these goals, SDRC is stepping up to assist claimant to achieve these goals through the appropriate vendors and service codes.

15. Finally, SDRC's adherence to relevant laws and regulations is critical to ensure it is in compliance should DDS conduct an audit of its vendors. This concern alone precludes TAG from continuing to provide RDI services to claimant because Service Code 102 is not appropriate as TAG is not providing services that firmly involve parent/caregiver training. Claimant's sister clearly wants the best for her brother. Going forward, she is encouraged to work in a collaborative manner with SDRC.

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ORDER

Claimant's appeal from San Diego Regional Center's determination that it will end funding for Relationship Development Intervention (RDI) by Therapeutic Approach to Growth (TAG), effective April 30, 2022, is denied.

DATE: June 1, 2022

JAMI A. TEAGLE-BURGOS
Administrative Law Judge
Office of Administrative Hearings

NOTICE

This is the final administrative decision; both parties are bound by this decision. Either party may appeal this decision to a court of competent jurisdiction within 90 days.