

**UNITED STATES DISTRICT COURT
DISTRICT OF RHODE ISLAND**

UNITED STATES OF AMERICA,

Plaintiff,

v.

Case No. 14-175

STATE OF RHODE ISLAND,

Defendant.

**STATE OF RHODE ISLAND'S
COMPLIANCE STATUS REPORT**

I. Introduction

On March 1, 2016 the parties filed a Joint Motion with the Court requesting a hearing to review the current status of the State's compliance with the Consent Decree's requirements. The parties also agreed to specific elements of information to be shared with the Court in the form of this Status Report.

The State agencies charged with implementation of the Consent Decree; the Department of Behavioral Health, Developmental Disabilities and Hospitals (BHDDH), the Department of Human Services Office of Rehabilitation Services (ORS), and the Department of Elementary and Secondary Education (RIDE), have worked diligently to compile a comprehensive set of materials to inform each element of the required status report.

Over the past two years the State agencies have organized themselves into an Interagency Consent Decree Team (ICDT). The ICDT is comprised of representatives from each agency who are both knowledgeable about the requirements of the Consent Decree and have sufficient programmatic expertise and authority in their respective agencies to effectuate the activities and

changes required in the Consent Decree. The ICDT meets bi-weekly or more frequently as needed and is convened by the State's appointed Consent Decree Coordinator.

As is discussed below, steps have been taken since December 2015 to elevate the authorities of the Consent Decree Coordinator in order to ensure that the ICDT is fully effective in its work. The Secretary of Health and Human Services, the Deputy Secretaries and each of the Directors of the state agencies are personally involved in monitoring Consent Decree implementation and remain briefed on an ongoing basis by the Consent Decree Coordinator and their respective representatives on the ICDT. When leadership level decisions are needed to remove barriers or ensure action on Consent Decree deliverables, the Secretaries and Directors are accessible to the Consent Decree Coordinator and ICDT members for any necessary actions to be authorized and taken.

As demonstrated by this Status Report and accompanying exhibits, and as will be more fully discussed in the context of the hearing on April 8th, the State has made substantial progress in all areas of the Consent Decree's requirements. Integrated employment and day services are being made available to more Rhode Islanders than ever before. The State has actionable plans to continue to expand the numbers of Rhode Islanders with intellectual and developmental disabilities who are receiving Consent Decree compliant integrated employment and day services. The State is working systematically with the Conversion Institute organized by the Sherlock Center at Rhode Island College, as well as the agencies delivering services to Rhode Islanders living with intellectual and developmental disabilities, to entirely transform the delivery system for supported employment and integrated day services in the State of Rhode Island.

There is much work that remains to be done between today and 2023 when the transformation set forth in the Decree will be complete. However Rhode Island is on course and

the system transformation is demonstrably under way. As is set forth in greater detail below, numeric goals in the Consent Decree for 2015 and 2016 have been met and exceeded. The Consent Decree required that 75 individuals move from sheltered workshop settings and segregated day services to supported employment by the end of calendar 2015. That number has been exceeded. More than 100 individuals reported participation in supported employment by the end of calendar 2015.

The State is currently exceeding its targets for the numbers of individuals who are participating in integrated community based employment, but there is much work that remains to be done in order to not only remain on pace but to accelerate the pace of these transitions as is envisioned in the Consent Decree.

As will also be evident from the below Status Report, the implementation of new systems and infrastructure for change are difficult to effectuate. Many institutional and bureaucratic barriers are both encountered and overcome on a daily basis as part of Consent Decree implementation. However the state is in substantial compliance in building and effectuating the new approaches, structures and systems in our state agencies required by the Consent Decree. The State agencies are putting in place new data collection systems, reporting methods, funding structures, and contracting vehicles, which will lead to complete system transformation by 2023.

II. Status Report

Paragraph 4 of the Court's Order dated March 3, 2016 set forth seven specific areas of reporting for purposes of this Status Report. They are labeled (a) through (e) in Paragraph 4 of the Court's Order and those designations have been retained here. In this section, an overview

of each area of reporting is found in sections (a) through (e) below. The Court Order's requirements for each section are repeated in italics for ease of reference.

Supporting documentation for each of the seven areas in the Status Report are referenced as exhibits and are either attached to this Status Report or filed separately with the Court in electronic form on a digital media drive. Exhibits filed via digital media drive are filed in that format in order that they can be viewed using the spreadsheet software with which they were created or, in some instances, to protect confidential information that should not be posted online with this Status Report.

a. Current Status of Funding to Effectuate Consent Decree Requirements

The current status of funding for the Consent Decree as required by Section XIV. The status report shall identify the amount of funding allocated to the State (BHDDH and ORS) during the current fiscal year (FY 2016: July 1, 2015-June 30, 2016) to provide supported employment placements and integrated day services to Consent Decree target group members as specified in sections IV(8)(a-d) and section IV(9)(a).¹

The report shall include the numbers of individuals who should have been placed in integrated employment and day services from the beginning of the Consent Decree through the end of FY2016, the total funds already allocated for that purpose, and the total funds not yet allocated but projected for that purpose in FY2016. The report shall also include the total anticipated cost of future placements of target group members required to occur in FY2017 consistent with the Consent Decree. The report shall identify the implementation of resource reallocation strategies consistent with the Consent Decree. This shall include resource reallocation to ensure that funding "follows the person" as individuals in the target populations transition from sheltered workshops to supported employment and/or integrated day only placements.

The budget resources allocated to each relevant State agency in FY15, FY16 and FY17 are attached as Exhibit 1. As these budget allocations demonstrate, the State remains fully

¹ Section IV(8):

(a) 50 individuals from youth exit population (1/1/15)

(b) All remaining youth exit population 2013-2014 and 2014-2015 (7/1/15)

(c) 50 individuals from sheltered workshop (1/1/16)

(d) All youth exit population 2015-2016 (7/1/16)

Section IV(9):

(a) 25 individuals from segregated day (1/1/16)

committed to providing sufficient funding to effectuate the goals and targets in the Consent Decree. This commitment is reflected in several specific categories of effort at BHDDH in FY17:

- An increase of \$1,870,474 to provide enhanced payments for integrated employment and day services. This was derived by identifying the goals for each adult target population: the 50 individuals moving from sheltered workshop to supported employment and the 25 individuals moving from center-based day programs to supported employment during FY17, and estimating the per person cost differential between the “old service” (sheltered workshop or center-based day program) and the “new service” (supported employment).
- An increase of \$5,000,000 under the category of “Enhanced Payments Direct Care Staff”, which will be targeted to provide financial incentives, in performance based contracts, to those providers who commit to achievement of numerical targets and implementation timelines.
- Funding in the amount of \$591,244 for four staff positions with particular focus on Consent Decree implementation: Consent Decree Coordinator, Chief Transformation Officer, Employment Specialist and Program Development Director. These positions are all additional to the existing staff who support programs and services for individuals with intellectual and developmental disabilities at BHDDH.
- Full funding of \$800,000 over two years (FY15 and FY16) for the Trust Fund called for in the Consent Decree.
- Full funding of \$675,000 over two years (FY16 and FY17) for the Conversion Institute called for in the Consent Decree.

- Funding totally \$244,260 over two years (FY16 and FY17) for participation in and expertise from NASDDS and the State Employment Leadership Network for purposes of informing and guiding the system transformation.

It is critical to note that the funding enumerated above focuses specifically on discrete Consent Decree implementation activities. This funding is additional to the ongoing budget for the provision of residential and day services to individuals with intellectual and developmental disabilities in Rhode Island. When combined with the ongoing costs of providing these “traditional” services, the overall budgetary request for FY17 is \$235,223,032 for services for individuals with intellectual and developmental disabilities within BHDDH alone, not accounting for the funding committed in ORS, RIDE and the State’s public school districts.

RIDE has made an ongoing commitment of over \$300,000 per year each year for FY15, FY16 and FY17. These funds support personnel and contracts focused on the implementation of the Consent Decree requirements. This is additional to the direct investments in employment related services to transition age students made by the school districts themselves. RIDE utilizes a portion of this funding for the maintenance of a regional network of support to school districts for technical assistance in the development of the required Career Development Plans for all transition age students in the Consent Decree target population.

The enumerated FY17 budgetary commitments to Consent Decree specific activities in the BHDDH budget are also additional to a tripling of funds in the ORS budget for employment services to Consent Decree target population members, from \$884,370 in FY15 to \$2,603,374 in FY17. ORS expanded employment services to individuals with intellectual and developmental disabilities from roughly 233 target population members in FY15 to

upwards of 560 projected target population members to be served in FY17.

Funding authorization for employment and day services is attached to the person, not to a program or an agency. Funding is based on the Individual Service Plan (ISP) and is transferable to other services or other providers. The individual can use his or her authorization for whatever services s/he prefers consistent with his or her needs and interests. For example, an individual may utilize the service allocation for segregated services or community-based services. In this sense the money follows the person based upon the ISP. The challenge in ensuring that all services migrate away from segregated services and to integrated services, as envisioned in the Consent Decree, lies in ensuring that there is a sufficient array of integrated services available to Rhode Islanders. Utilizing budgeted funds to provide incentives for integrated services, and ceasing to pay for segregated services will be the strategies employed to ensure wholesale system transformation between 2015 and 2023.

b. Implementation of Performance–Based Contracting Linking Funding to Outcomes and Utilizing Incentives

Evidence that the State has developed and is implementing performance-based contracts for supported employment services that links funding to the provider’s achievement of numerical targets and implementation timelines. The State shall also produce evidence that it is utilizing a flexible reimbursement model that incentivizes integrated employment placements and comports with Section XIV(5) of the Consent Decree. The State shall further produce evidence of an ongoing allocation for transportation services as required by Section XIV(6) of the Consent Decree.

The transition to performance-based contracting is under way in all Rhode Island EOHHS agencies, including those charged with implementing the Consent Decree. The Government Performance Lab of the Harvard Kennedy School has a team of five Fellows on the ground in Rhode Island working with R.I. state agencies to identify contracts that can make the change to being performance based. Within the EOHHS agencies, Performance Lab performance-based contracting planning sessions have already been held with DHS and DCYF.

The Performance Lab will also work with BHDDH to assist the agency to procure integrated employment and day services in a manner that incentivizes integrated employment services, including numeric goals and timelines for the shift to “new” services. ORS’s current fee-for-service structure will also be reviewed for realignment to be more performance-based.

During FY17 the State, through BHDDH, will provide agencies actively engaged with the Conversion Institute enhanced funding opportunities for 75 members of the adult target population to convert from Sheltered Work and Segregated Day Services to Supported Employment and Integrated Day Supports. Among the 9 organizations engaged with the Conversion Institute, 75 individuals will be identified for more intensive supports leading to employment and community integration. Additional funding (provided for in the enhanced BHDDH budget lines for services and staff increases discussed above) will be tied to these outcomes.

Other non Conversion Institute provider organizations will also have the opportunity to apply for enhanced funding to move individuals into supported employment. Included in these opportunities for higher funding will be young adults transitioning to BHDDH, who are also members of a target population for whom supported employment and community day are the intended service outcomes.

These activities are already under way in other agencies. For example, RIDE is currently using a performance-based contract with the Regional Transition Centers referenced above. (The Regional Transitions Centers contract is provided as an example of this kind of procurement methodology under way as Exhibit 2.)

The Consent Decree in Section XIV (6) requires the funding of an ongoing allocation of transportation services for individuals in the Target Populations to obtain and maintain

Supported Employment and Integrated Day Services. BHDDH Authorizations/Expenditures report for FY15 Transportation (T2003) shows authorizations of \$14,565,832.10 and expenditures of \$9,932,048.43. The Projected transportation allocation for FY17 is \$9,730,243. (The transportation report is attached as Exhibit 3.)

c. Unduplicated Members of the Target Populations Identified in the Consent Decree for Tracking Purposes Going Forward

An unduplicated list, to date, of all members of the target populations identified in the Consent Decree, with personally identifiable information, such as names, replaced with letters (e.g., a-z, aa-zz). These identifiers shall be used consistently in future hearings so the parties and the court may identify progress of specific individuals. The list should indicate whether, if applicable, each individual has received a career development plan and annual review and benefits planning information and counseling services as required by Sections V(A)(1)-(2), VIII(4)-(10), IV(3), and IV(S)-(6) of the Consent Decree. The list should also indicate which individuals have received supported employment placements and who is participating in integrated day services as required by Sections IV(8)-(9) of the Consent Decree. If any individual in any of the target populations has not received the required placements or services, the State shall present evidence, including individual level data regarding barriers, to assist the court in determining what resources are needed in order to achieve the required employment placements for consideration in future court orders.

Unduplicated Target Population - Transition Age Students = 622

As evidenced by Exhibit 4 (submitted via digital media drive due to spreadsheet configuration), RIDE identifies 512 students ages 14-21 with Intellectual Disabilities who comprise the target population of “Transition Age Students”. ORS serves an additional 110 students ages 18-21 with other Developmental Disabilities. Thus the total number of Transition Age Students receiving services defined in the Consent Decree is 622 at the time of filing of this Status Report.

RIDE now requires that all students in the target population have a Career Development Plan. All Career Development Plans must be completed and placed in the student’s educational record by June 30, 2016. Based on the interactions that RIDE staff have on a routine basis with all of Rhode Island public school districts, this requirement is being fulfilled by the school

districts. Although RIDE does not serve as a central collection point for student records, these Career Development Plans are maintained in the student records by the local school districts and RIDE is verifying that districts are complying with this requirement.

Unduplicated Target Population – Facility Based Program Participants = 2,454:

At the time of the filing of this Status Report BHDDH identifies 1,661 adults in facility-based, non-work programs. BHDDH identifies another 690 adults enrolled in a combination of facility-based work and facility-based non-work programs and 103 adults enrolled in facility-based work only. Thus the total number of BHDDH adults in the target population is 2,454.

A copy of the employment and day services component of the Individualized Service Plan for each member of the adult target population (2,385 Individualized Service Plan summaries) has been included as Exhibit 5. Because some individually identifiable information may be found in these Individualized Service Plan summaries this Exhibit is filed on a digital media drive to protect the confidentiality of members of the target population for example regarding the nature and location of their services. Each Individualized Service Plan describes the individual's goals including career and employment targets.

d. Unduplicated Total Counts That Reflect the Percentages of Individuals in Each Target Population in Employer Paid Jobs (Attainment of Consent Decree Annual Goals for Individuals in Consent Decree Compliant Services)

Unduplicated totals that reflect the total numbers and percentages of individuals in each target population who have been placed in employer-paid jobs and integrated day services.

RIDE has identified 156 individuals who are members of the Youth Exit Population (54 individuals in 2013-2014; 45 individuals in 2014-2015; and a projected 57 individuals in 2015-2016). In its 2015-2016 IDD Report ORS identifies 37 successful closures (employment achieved) representing 23.7% of the total Youth Exit Population. The specific services being delivered to members of these target populations are not available in a format that can be tracked

at the individual level. However the 2016 Employment and Day Activities Report survey being conducted by the Sherlock Center will provide complete information on both the employment and integrated day activities of this population, trackable at the individual level and collected on a quarterly basis.

The Adult Sheltered Work/ Segregated Day Target Population total is 2454.

A comparison between the 2013 and 2015 Employment and Day Activities reports provided by the Sherlock Center shows that between the beginning of the Consent Decree and May 31, 2015 sixty individuals were placed in employment. The ORS Successful Closures report shows that forty-one additional individuals became employed between June 1 and December 31, 2015 for a total of 101 target population individuals in employment as of December 31, 2015.

e. Detailed Information for Each Individual Placed in Supported Employment

For individuals in the target populations who have been placed in supported employment, the following information for each placement:

- (a) a copy of the individual's person- centered benefits planning information as well as a career development plan;*
- (b) the wage earned by each individual and the name of the employer payor;*
- (c) the number of hours worked by each individual and, if the number of hours worked is less than 40 hours per week, a description of the integrated day activity opportunities afforded to fill the remaining time; and*
- (d) the physical location of each job.*

At the time of filing of this Status Report the most complete information regarding the required details of each individual's person-centered plan is the ORS Successful Closure Report for 2015/2016 (attached as Exhibit 6). This report provides the required information in aggregated form. Included in this report is each individual's job title, hours per week, wages and physical job location. This information is available for 99 people and includes members of the Youth Exit population (ages 21-25) as well as adults over 25 served by BHDDH. Exhibit 6 also contains the Sherlock Center comparisons of services provided to the target populations,

comparing services provided in the beginning of 2013 with services provided in 2015. This Sherlock Center material provides additional information to supplement the ORS Successful Closure Report demonstrating what employment services are actually being provided. For purposes of completeness, ORS has also provided a comprehensive list of all services currently being provided by ORS to the I/DD population served by ORS (Transition Age Youth with I/DD under age 25). This details services provided to a total of 361 people and this Service List is attached as Exhibit 7.

The ORS Successful Closure Report provides all of the elements of information enumerated in the Court's Order. However this report is not trackable to individual target population members. To fill this gap the ICDT has worked closely with the Sherlock Center staff to re-engineer the Employment and Day Supports Survey system for the State of Rhode Island.

By June 2016 the Sherlock Center will have completed its tabulation and analysis of the redesigned 2016 Employment and Day Supports Survey. This updated and redesigned surveying system will provide all the requested data points for the adult target population on a quarterly basis, trackable to individual members of the target population. The Survey will be conducted quarterly post June 2016 and will enable ongoing measurement of targets related to the Consent Decree at the individual level.

The restructuring of the survey tool is a good example of the kind of data and reporting infrastructure that the State has needed to build in order to closely monitor progress against Consent Decree targets. It has been a laborious process to restructure the survey tool and has involved many hours of careful thought and broad consultation with experts locally and nationally. This new survey tool will provide the State, the Department of Justice and the Court

(including the Court Monitor) with real-time information on a quarterly basis, trackable at the individual level. The new survey tool collects detailed information for each member of the target populations using definitions and categories accepted nationally as valid for tracking progress against our Consent Decree goals for integrated employment and day services.

f. Addressing the Issue of Employability

The numbers and percentages of members of any target group who the State deems "unemployable" or otherwise not able to receive vocational or employment services, the reason for that determination for each individual, and a description of the evaluations that precipitated those decisions.

Consent Decree Section V.F states, *"The State, including BHDDH, ORS, and RIDE, will establish and implement a policy or policies that include the presumption that all individuals covered by this Consent Decree are capable of working in integrated employment settings."*

Consistent with this requirement in 2014 Rhode Island became an "Employment First" state. Rhode Island adopted the philosophy and policy that all people with disabilities are presumed to be candidates for employment and to be capable of working in an integrated employment setting. To date, the State has deemed no individual to be "unemployable" as an exception to this policy. BHDDH and RIDE have formally adopted Employment First policies (Agency Employment First Policies attached as Exhibit 8) and ORS has as its core mission a commitment to employment for all individuals with disabilities.

Consent Decree Section XIX.5 states, *"With the exception of conditions or practices that pose an immediate and serious threat to the life, health, or safety of individuals receiving services under this Consent Decree, if the United States believes the State has failed to fulfill any obligation under this Consent Decree, the United States shall, prior to initiating any court proceeding, notify the State in writing of any alleged non-compliance with the Consent Decree and request that the State take action to correct such alleged non-compliance."* This provision

very appropriately creates a special status for conditions or practices that pose an immediate and serious threat to the life, health, or safety of individuals receiving services under the Consent Decree. Consistent with this recognition that health and safety concerns must be paramount, the State asserts that individuals with significant medical conditions and/or illnesses can not be required to engage in inappropriate services that would pose a threat to the individual's life, health, or safety. It is foreseeable that some Rhode Islanders living with intellectual or developmental disabilities might be unable to participate in employment services due to medical constraints. However given the phased-in approach called for in the Consent Decree, the State has not yet confronted the dilemma of defining an individual or individuals as unemployable for medical reasons in the first cohorts required to be transitioned to integrated employment services during calendar 2015 and calendar 2016. This will remain an important area for discussion between the parties, with the support and involvement of the Court Monitor, during the period culminating in 2023. The State remains very open to thoughtful discussion among the parties on this topic as we proceed with implementation of new employment services.

Consent Decree Section VI.B.7 also provides meaningful options to individuals who are of retirement age. *"Retirement-age adults with I/DD who are eligible for Integrated Day Services will have access to supported retirement activities, including a mix of leisure, meaningful senior-related activities, and daily life activities that are comparable to those activities engaged in by retirement-age non-disabled peers, and will include the availability of paid and natural supports."*

It should be expected that as the term of the Consent Decree proceeds, some individuals with complex medical conditions and/or those who are elderly or experiencing dementia may be considered unemployable. However given the size and scope of the target population, the State's

focus has been on moving as many people as possible into integrated employment in these first years of Consent Decree implementation. The State finds that people with significant disabilities have found self-employment or other unique opportunities to be productive and earn incomes. As a result, the State has no intention of categorically ruling out employment for any group of individuals at this time.

g. Consent Decree Coordinator with Authority – Staffing for System Change

Whether the State hired a permanent Consent Decree Coordinator with the appropriate enforcement authority to carry out compliance.

The State has appointed permanent Consent Decree Coordinator Mary Madden. Based on consultation with the Court Monitor and Department of Justice in December 2015 the Consent Decree Coordinator role was elevated to be a direct report to the Secretary of Health and Human Services with the full authority of the Secretary and the Governor. (Letter of Appointment attached as Exhibit 9).

Three additional positions have also been created within BHDDH to support Consent Decree implementation. Former Consent Decree Coordinator Andrew McQuaide has taken on the position of Chief Transformation Officer. The positions of Employment Specialist and Program Development Director, recommended by the Court Monitor, have been posted and are in the process of being filled. The State's ability to effectively meet the goals of the Consent Decree is further enhanced by the establishment and filling of the position of Director of Analytics at EOHHS. This Director convenes staff across all of the EOHHS agencies to coordinate data collection and analysis efforts and has played a pivotal role in assisting the state agencies to collect, organize and de-duplicate the data for this Status Report.

III. Conclusion

The State of Rhode Island is in substantial compliance with all requirements of the Consent Decree at this time. By the end of 2015 seventy-five individuals were to have been moved from sheltered workshop and segregated day programs into employment. More that 100 individuals have made that transition as of the filing of this Status Report. All transition age students were to have Career Development Plans and that goal has been met. ORS expanded employment services to individuals with intellectual and developmental disabilities from roughly 233 target population members in FY15 to upwards of 560 projected target population members to be served in FY17.

Significant investments of enhanced targeted funding, data infrastructure and staff positions to support Consent Decree implementation have all been put in place and continue to grow and develop. The state agencies have organized themselves into a functional interagency team with a fully authorized and empowered Coordinator to convene, coordinate and support their efforts. The interagency team and Coordinator have leadership support from Department Directors, HHS Secretaries and the Governor and her staff. The state agencies are in accord about what needs to be done to accomplish the goals in the Consent Decree and are working cooperatively on a daily basis.

The efforts and progress detailed in this Status Report are only the beginning of a long journey. There is much work that remains to be done. Resources, both human and fiscal, will continue to need to be carefully marshaled in order for the State to remain on its current trajectory for full compliance with all Consent Decree requirements by 2023.

Defendants,
By their attorney²,

/s/Marc DeSisto

Marc DeSisto, Esq. (#2757)

DESISTO LAW

211 Angell Street

Providence, RI 02906

Phone: (401) 272-4442

Fax: (401) 272-9937

Email: marc@desistolaw.com

CERTIFICATION

I hereby certify that a true and accurate copy of the enclosed document was electronically filed with the Court, and is available for viewing and downloading from the ECF system and, in addition, was emailed and mailed via Express Mail, including all exhibits, on this 1st day of April, 2016, to:

Peter Stephan, Esq.
Nicole Zeitler, Esq.
Victoria Thomas, Esq.
1425 New York Ave.,
NW, Room 4062
Washington, DC 20005

Charles Moseley EdD
Court Monitor US District Court
Rhode Island Consent Decree and Interim
Settlement Agreement
PO Box 544
Charlotte, VT05445

/s/Marc DeSisto

Marc DeSisto

² In accord with this Court's Order of March 3, 2016, this Compliance Status Report was prepared by members of ORS, BHDDH, RIDE and other applicable governmental entities who agree with its content and accuracy, therein.

EXHIBIT LIST

- | | |
|------------------|--|
| Exhibit 1 | FY15-FY17 Budget Resources BHDDH, ORS and RIDE |
| Exhibit 2 | RIDE Regional Transition Centers performance-based contract |
| Exhibit 3 | Transportation Report |
| Exhibit 4 | De-duplicated target population lists (submitted via digital media drive) |
| Exhibit 5 | 2454 Target Population Individual Service Plans (submitted via digital media drive to protect confidentiality) |
| Exhibit 6 | ORS Successful Closure Report 2015/2016 |
| Exhibit 7 | ORS Services List – All populations |
| Exhibit 8 | Employment First Policies |
| Exhibit 9 | Consent Decree Coordinator Letter of Appointment |