KANSAS STATE DEPARTMENT OF EDUCATION

OFFICE OF GENERAL COUNSEL

ESI Administrative Review

Requested on May 20, 2026

Case No. 2026-ESI-01

Date of Decision: June 22, 2026

This Hearing Officer has been duly appointed by the Kansas State Board of Education to conduct an investigation, establish findings of fact, and oversee the administrative review of this matter.

On April 1, 2026, [redacted] ("Parent") filed a formal complaint regarding the use of emergency safety intervention ("event") that occurred on March 2, 2026 at [redacted] ("School') regarding [redacted] ("Student"). On April 15, 2026, Parent was informed by USD 431 ("District") Superintendent [redacted] ("Superintendent") that Parent's complaint would begin the informal complaint process. On April 24, 2026, Superintendent sent their investigation findings and informal resolution to Parent via email. On May 20, 2026, the Kansas State Department of Education ("KSDE") received Parent's request for administrative review. Upon receiving Parent's administrative review request, KSDE forwarded a copy of the request to the clerk of the local school board, as required by K.A.R. 91-42-5(c)(2), and Superintendent.

KSDE Investigation

In support of this review, the Hearing Officer conducted an investigation. The investigation included the following:

1. Review of documents provided by Parent, including the informal resolution they received from District, their timeline of the event, and their letter to the local school board requesting review.
2. Interview with Parent by telephone.
3. Interview with [redacted] ("Director"), Director of Special Education, via Teams.
4. Interview with [redacted] ("Staff Member"), Sped Behavior and Autism Coach, via phone.
5. Interview with [redacted] ("Teacher"), Special Services Teacher, via Teams.
6. Review of video footage provided by the District.

7. Review of documents provided by the District, including its response to the event, its documentation of the Student's behavior on the day of the event, its timeline of the event, its dispute resolution process and policy, and its answers to the ESI Seclusion Tool created by the Kansas State Department of Education (KSDE).
8. Review of interviewees' Mandt certification.
9. Review of Mandt training materials.
10. Discussion with staff members of the Special Education and Title Services team of KSDE.

Issues

1. Whether an emergency safety intervention (seclusion and/or restraint) was used during the event, as defined by state law.
2. Whether the side room (seclusion room) used during the event was a safe space, as required by state law.
3. Whether Parent was provided with written documentation of the use of emergency safety interventions, as required by state law.
4. Whether the District's policies and procedures regarding the use of emergency safety interventions comply with state law requirements.

Findings of Fact

1. Director completed seven (7) hours of training in the use of emergency safety interventions in August 2025. The training was provided by Mandt. Director's certification and training will expire in August 2026.
2. Staff Member completed four (4) days of training in the use of emergency safety interventions in June 2025. The training was provided by Mandt. Staff Member's certification to instruct others on the use of emergency safety interventions will expire in June 2027.
3. Teacher completed fourteen (14) hours of training in the use of emergency safety interventions in July 2025 and August 2025. The training was provided by Mandt. Teacher's certification and training will expire in July 2026.
4. Mandt is a nationally recognized provider of training and support for schools in the appropriate use of de-escalation techniques as well as seclusion and restraint.
5. Student was a third-grade student at School during the 2025-2026 school year. Student attended school for one (1) hour each day in Teacher's classroom.
6. As of March 2, 2026, Teacher's classroom consisted of a main classroom with two teacher's desks, several tables and chairs for students, cabinets, bookshelves, wall decorations appropriate for an elementary school classroom, and multiple doors. Connected to the classroom is a side room that appears to be the size of a small office.

7. Parent and School agreed to provide Student a break space that Student can use when they are overstimulated. The side room is Student's break space. The room is well lit and allows staff to view the inside of the room via a window on the door and another larger window on the side of the room. The door to the side room does not lock. The side room contains Student's tent, stuffed animals, and blankets. The room also contains several boxes, a filing cabinet, and a student desk and chair.
8. On March 2, 2026, at approximately 12:08 p.m., Student walked into the classroom. Student had not finished their lunch at home. Teacher and Student engage in a short conversation about Student's lunch.
9. At approximately 12:11 p.m., Staff Member attempts to engage Student in conversation. When Staff Member tries to engage with Student, Student flicks/tosses food at Staff Member and asks Staff Member to "go away." Staff Member did as Student asked. Once Staff Member relocates to the other side of the room, Student walks over to where Staff Member is sitting and flicks/tosses food at Staff Member again. Afterward, Student returns to their seat.
10. At approximately 12:22 p.m., Student begins to toss classroom chairs on the floor. Staff Member gives Student the choice of going to the library to check out books or going outside to play. Student tells Teacher to "shut up."
11. At approximately 12:25pm, Teacher attempts to start the day's math lesson. During the attempt, Student throws a pillow and blankets at Teacher. Student climbs on a table. Student removes themselves from the table without being prompted.
12. At approximately 12:26 p.m., Teacher attempts to start the day's math lesson with Student. Meanwhile, Student throws classroom baskets at Staff Member. Staff Member attempts to dodge the baskets that Student is throwing and moves further away from Student. Student follows Staff Member as they retreat. To ensure their safety, Staff Member enters the side room and closes the door.
13. Director attempts to engage Student to find out what was wrong and make efforts to de-escalate Student, including asking specific questions to prompt Student to try and explain how they were feeling.
14. At approximately 12:29 p.m., Staff Member exits the side room. Once Staff Member exits, Student begins to throw objects at Staff Member.
15. Director once again attempts to engage Student to find out what is wrong. Student states that the three staff members in the room are trying to fight them since it is three versus one. Director assures Student that they are not trying to fight them but ensure that both Student and staff are safe. Student asserts that they would win the fight. Student also stated that they wish Staff Member were dead.
16. At 12:33 p.m., Teacher asks whether Student needs a break. Staff Member tells Student that they can enter their break space (the side room) if the Student wants a break.
17. At 12:33 p.m., Student climbs onto a desk and begins to attempt to throw objects. Staff Member and Director grab Student by the arm and wrist to remove Student from the

desk. Once Student is removed from the desk, Student begins to throw objects at Staff Member.

18. At 12:34 p.m., Student climbs onto a kidney table and jumps off.
19. At 12:35 p.m., Director tells Student that they will escort Student to the side room if Student continues to throw objects. Student throws an object at Staff Member.
20. At 12:36 p.m., Director and Staff Member both loop one of their arms under each of Student's shoulders to escort Student into the side room. During the effort, Student jumps up and down and is still led to the side room. Student also goes limp and is still led to the side room. Accordingly, Student's feet are off the classroom floor and lightly graze the classroom floor while Student is still being led by Director and Staff Member to the side room.
21. Despite the Student's effort to get free, Director and Staff Member get Student into the side room. Once Student is in the side room, Staff Member closes the door. The door is not locked.
22. At approximately 12:36 p.m., Director tells Student, "when you are calm you can come out." Student hits the window of the side room with an object.
23. Director and Staff Member ensure that Student is safe by viewing Student from the side room's two windows.
24. At approximately 12:36 p.m., Staff Member is standing directly in front of the side room door with their hand on the door handle. Staff Member continues to stand directly in front of the side room door.
25. At approximately 12:37 p.m., Staff Member and Director remove items from the side room that could pose a danger to Student, including a desk, chair, and boxes containing items.
26. Once all items deemed unsafe were removed from the side room, Director and Staff Member sat down at a table where they could still view Student to ensure their safety. Teacher remained standing away from the side room door.
27. At approximately 12:38 p.m., Student deconstructed the tent that was in the side room. Deeming that the tent's poles were unsafe, Staff Member removed the tent and the poles from the room. Upon removal, Staff Member closed the door. Staff Member and Director sat down at the same table where they continued to view Student.
28. At approximately 12:41 p.m., Staff Member once again stands directly in front of the door to the side room.
29. At approximately 12:42 p.m., Director enters the side room to engage with Student and attempt to de-escalate Student.
30. At approximately 12:44 p.m., Staff Member once again stands directly in front of the door to the side room. Staff Member also places their hand on the door handle.
31. At approximately 12:48 p.m., Student climbs on top of a filing cabinet that is located within the side room. Director and Staff Member grab Student by the arms and remove

them from atop the filing cabinet. Director and Staff Member remove the filing cabinet from the room.

32. Staff Member and Director return to the kidney table outside the side room and sit down.
33. At approximately 12:51 p.m., Director enters the side room to remove an object that would be a danger to the Student. While Director is in the side room, Student begins hitting Director with a rolled poster/paper.
34. At approximately 12:54 p.m., Student opens the door. Director and Staff Member are standing directly in front of Student. Student swats the rolled poster/paper at Direct. Director tells Student "if you are going to hit, we're going to escort you back in." Student attempts to hit Director with rolled poster/paper. Student reenters the side room. Once Student enters the side room, Staff Member shuts the door.
35. Once the door is shut, Staff Member and Director return to their seats at the kidney table closest to the side room.
36. At approximately 12:55 p.m., Student opens the door. Student returns to the side room with the door closed.
37. At approximately 12:57 p.m., Student opens the door again. Student begins to swing the door.
38. At approximately 12:58 p.m., Student hits Staff Member with the rolled poster/paper. Staff Member grabs Student's arms and wrestles the rolled poster/paper away from Student. Afterward, Student climbs onto a desk. Director and Staff Member each grab one of Student's arms and lift him down from the desk. On the way down, Student grabs Director's hair.
39. Once off the desk, Student walks to another table and climbs on top of it. Without prompting Student to get off the table, Staff Member and Director each grab one of Student's arms and pull Student from the table. With Staff Member and Director each having an arm under Student's armpit, Student is escorted to the side room.
40. At approximately 12:59 p.m., Student exits the side room on their own volition. Upon exiting, Student begins to throw objects at Staff Member and Director. After throwing several objects, Student voluntarily enters the side room at approximately 1:01 p.m. Staff Member closes the door and carries on cleaning the classroom.
41. At approximately 1:02 p.m., Parent enter the classroom. Upon seeing their parent enter, Student opens the door of the side room. Once Student exits the side room, Student begins throwing objects at Staff Member. Parent enters the side room with Student and closes the door.
42. At approximately 1:09 p.m., Parent and Student exit the side room and the classroom. Teacher gathers Student's bookbag and coat. Teacher and Director followed Parent to Parent's car. On the way to Parent's car, Director orally informed Parent of the event.
43. On April 10, 2026, the local school board received a letter from Parent requesting a private meeting with the board to address concerns regarding the event, including the lack of documentation.

44. On April 15, 2026, Superintendent responded to Parent's letter via email. Superintendent considered Parent's letter an official complaint that began the informal review process. In the same email, Superintendent attaches Board Policy GAAF – Emergency Safety Intervention. Superintendent advises Parent to review the "Local Dispute Resolution Process" section, which outlines the steps for addressing Parental concerns regarding emergency safety interventions.
45. District policy includes:
    a. A requirement that all school personnel be appropriately trained;
    b. A requirement that each school building maintain appropriate documentation;
    c. A local dispute resolution process;
    d. A procedure for parents to request an administrative review by the State Board;
    e. A system of collection and maintenance of documentation for each use of emergency safety interventions;
    f. An exemption for law enforcement officers; and
    g. A procedure for when and how parents are to be provided with notice.
46. District policy also includes references to a means to informally resolve a complaint. If an informal resolution is reached, the administrator must provide a written report of the informal resolution to the superintendent and the parents and retain a copy of the report at the school. The superintendent shares the informal resolution with the local school board and provides a copy to the state department of education. Parents are provided the option to submit a formal written complaint "if the issues are not resolved informally with the building principal and/or the superintendent."
47. On April 24, 2026, Superintendent emails Parent an "ESI Informal Resolution." Superintendent instructs Parent to read the follow up carefully and, if Parent agrees, to sign both copies and return one to Superintendent.
48. On May 20, 2026, KSDE received Parent's Emergency Safety Intervention Administrative Review Request.

Issue 1-A: Physical Restraint

Emergency safety interventions (seclusion or restraint) can only be used when a student presents a reasonable and immediate danger of physical harm to the student or others with the present ability to effect physical harm.[1] The level of physical harm or injury does not have to be substantial before school staff can act. There only needs to be a risk of physical harm or injury to the student or others. In this case, the Student was throwing classroom objects at Director and Staff Member. Staff Member must have been concerned about possible injury since they retreated to the side room. Further, Student was climbing onto classroom tables and desks. Director and Staff Member must have been concerned about possible injury to either themselves,

[1] K.A.R. 91-42-2(a).

Student or both since Director and Staff Member removed Student from the classroom into the side room, even though neither believe the use of a physical escort to remove a student from one location to the other is a form of physical restraint.

This Hearing Officer does not question or second guess school staff's perceptions of whether a student is at risk of causing themselves or others physical harm or injury. This Hearing Officer only asks whether staff beliefs are reasonable. Here, it was reasonable for staff to believe that Student could hurt themselves when climbing on top of classroom tables and desks. It is also reasonable for staff to believe that Student could hurt staff when Student was throwing classroom objects at staff. Furthermore, Student verbally indicated that he wished Staff Member was dead. Taking all of these into account, it was reasonable for staff to believe that Student presented a reasonable and immediate danger of physical harm to Student and others (staff).

Kansas law also requires that less restrictive alternatives be deemed inappropriate or ineffective by staff under the circumstances before a student can be subject to restraint.[2] In this instance, Staff Member gave Student the choice of going to the library to check out books or going outside to play once Student's behavior began to escalate. Director also attempts at least twice to engage Student to find out what was wrong and make efforts to de-escalate Student, including asking specific questions to prompt Student to try and explain how they were feeling. Staff efforts were ineffective. Since Student presented a reasonable and immediate danger of some physical harm or injury and less restrictive alternatives were ineffective, staff had the option to physically restrain Student.

"Physical restraint" means bodily force used to substantially limit a student's movement.[3] Consensual, solicited, or unintentional contact and contact to provide, comfort, assistance, or instruction are not physical restraint.[4] Staff involved repeatedly called their actions an escort. One way to differentiate an escort from a restraint is the ability of a student to remove, avoid, or terminate the temporary touch. If a student can step away from or easily move their own body part to terminate the guiding touch, it is not a restraint. If a student struggles to make space between themselves and the teacher's hand or arm, it is probably a restraint.

Here, Director and Staff Member repeatedly grabbed Student by both arms to remove them from classroom furniture. Director and Staff Member also each looped one of their arms under Student's arm pit while each placing their other arm/hand on Student's wrists to move Student to the side room. In this position, Student could not easily step away from or easily move their arms to terminate the guiding touch. There was no way that Student could remove, avoid, or terminate the temporary touch of Director and Staff Member. Student tried to do so by wiggling,

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[2] *Id.*
[3] K.A.R. 91-42-1(o).
[4] *Id.*

jumping up and down, and going limp but failed to remove themselves. During these attempts, Student is still moving toward the side room while Student's feet are off the classroom floor or lightly dragging on the classroom floor. This shows that bodily force was used to limit Student's movement because Student could not terminate the touch or remove themselves. Therefore, Student was subject to a physical restraint.

Issue 1-B: Seclusion

The same initial analysis applies to seclusion. Since Student presented a reasonable and immediate danger of some physical harm or injury and less restrictive alternatives were ineffective, staff had the option to seclude Student. "Seclusion" means placement of a student for any reason other than for discipline in a location.[5] In addition, there are two other requirements for an event to be considered a seclusion. First, school staff must *purposefully isolate* the student.[6] To "purposefully isolate" means that school personnel are not meaningfully engaging with the student to provide instruction and *placement of a student within an area of purposeful isolation by school personnel* [emphasis added].[7] An "area of purposeful isolation" means any separate space, *regardless of any other use of that space*, other than a hallway or similarly open environment [emphasis added].[8] Second, the student must be prevented from leaving or the student must have reason to believe that the student will be prevented from leaving the area of purposeful isolation.[9]

Here, Student was placed in a location, the side room, for a reason other than in-school suspension or detention. Although staff tried to meaningfully engage with Student when staff discussed the incident one-on-one with Student, Student was alone in the side room during the incident. Thus, there was no meaningful engagement at that point. Further, the side room is an area of purposeful isolation because it is a separate space other than the hallway or similarly open environment, such as a classroom. In fact, the side was a closed environment when staff shut the side room door. Staff note that the side was Student's "break space." The use of the side room as a "break space" holds no bearing on whether the side room was an area of purposeful isolation during the event. Other uses of a space are not to be included in an analysis of whether that space is an area of purposeful isolation. The analysis stops at whether the separate space was a hallway or similarly open environment, such as a classroom. Therefore, the first prong of seclusion (i.e., staff must purposefully isolate the student) is met.

The second prong of seclusion requires the student to be prevented from leaving or that the student has reason to believe that student will be prevented from leaving the separate space.

[5] K.A.R. 91-42-1(r).
[6] K.A.R. 91-42-1(r)(1).
[7] K.A.R. 91-42-1(p).
[8] K.A.R. 91-42-1(b).
[9] K.A.R. 91-42-1(r)(2).

Here, Staff Member placed their hand on the side room's door handle more than once. This action prevented student from leaving the side room. Furthermore, by Staff Member standing directly in front of the side room door and placing their hand on the side room door handle, a student could believe these actions were meant to ensure that Student did not leave the side room. Regardless, when a student is placed in or otherwise directed to an area of purposeful isolation, the student shall have reason to believe that the student is prevented from leaving.[10] Here, student was directed to an area of purposeful isolation, as established by the previous paragraph. Thus, Kansas law presumes that Student had reason to believe that they were prevented from leaving the side room. Therefore, Student was subject to seclusion.

Superintendent, Staff Member, and Director all noted use of a KSDE Qualtrics seclusion guidance tool. KSDE created the tool only as means to provide districts guidance. The tool was created to allow Kansas districts to determine whether an incident resulted in seclusion. The tool is subjective. When using the tool, it is up to district staff to answer questions accurately and honestly. There is no safety net or backstop that ensures answers are correct according to each question. Thus, inaccurate and dishonest answers result in inaccurate results, and inaccurate results provide incorrect guidance. Hitherto, KSDE has received positive feedback from districts across Kansas who have used the tool. Therefore, this Hearing Officer still recommends that District utilize the tool. However, this Hearing Officer cautions the District and staff that the tool's results will only be as good as the answers it is provided. Thus, it is recommended that District and/or School staff come together to decide whether the incident meets the definition of seclusion.

Issue 2: Side Room (Seclusion Room) as a Safe Place

Each area of purposeful isolation shall be free of any condition that could be a danger to the student.[11] In this instance, the side room was not free of all conditions that could be of danger to Student, especially because the initial danger that Student posed to themselves was climbing on classroom furniture. There were furniture and a filing cabinet present in the room. This Hearing Officer notes that these items were removed from the side room once staff recognized that Student was wanting to climb on top. Going forward, this Hearing Officer recommends that the filing cabinet and other furniture be permanently removed from the side room so long as the side room is used as a seclusion space.

Issue 3: Written Notification/Documentation

When an emergency safety intervention is used, schools are required to provide notification and written documentation. The school must notify the parent the same day the

[10] K.A.R. 91-42-2(d)(3).
[11] K.A.R. 91-42-2(d)(5).

emergency safety intervention is used.[12] School may notify parent of the use of emergency safety intervention orally. Even though School may orally notify parent of the use of emergency safety interventions, School must provide written documentation of the use of an emergency safety intervention no later than the following school day.[13] Documentation shall include the date and time of the intervention, the type of intervention, the length of time the intervention was used, the school personnel who participated in or supervised the intervention, the events leading up to the intervention, the student behaviors that necessitated intervention, the steps taken to transition the student back to the educational setting, space or additional forms for parents to provide feedback or comments, a statement that invites or strongly encourages parents to schedule a meeting to discuss the incident and how to prevent future use of interventions, and email and phone information for the parent to contact the school to schedule said meeting.[14] After an incident, the school shall also provide the following printed information: a copy of the standards for when interventions can be used, a flyer of the parent's rights, information on the parent's right to file a complaint through the local dispute resolution process, and information that will assist the parent in navigating the complaint process, including contact information for the parent training and information center and protection and advocacy system (e.g., Families Together).

During the event, emergency safety interventions (i.e., seclusion and restraint) were used. Here, school staff orally notified Parent of the event. However, the school failed to provide written documentation of the event and printed information about Parent's rights and the local dispute resolution process. Kansas law requires that parents receive the information listed above so that they understand the incident, next steps, and their rights and the rights of their children. Moving forward, School must ensure that parents receive written documentation of the intervention used and printed information regarding their rights and the local dispute resolution process.

Issue 4: Dispute Resolution Process Policy

The requirements for a school district's written policies are established by K.S.A. 72-6153(g) and K.A.R. 91-42-3. District uses a model policy relied upon by many, if not most, Kansas public school districts. This model policy essentially repeats the standards and requirements from those two bodies of law. Most of District's written policy complies with state law. However, one part of the written policy is of concern and was strongly recommended for removal in a 2019 administrative review decision.[15] The second paragraph of the Local Dispute Resolution Process encourages parents to file an "informal complaint" before filing a "formal

[12] K.A.R. 91-42-4(a).
[13] K.A.R. 91-42-4(b).
[14] *Id.*
[15] *See* Administrative Review 2019-ESI-01.

complaint" with the local school board.[16] Only if parental concerns are not resolved informally may a parent submit a "formal complaint" to the local board within thirty (30) days after the parent is informed of the incident.[17]

Negotiation and resolutions are common in disputes. Thus, it is understandable why District would try to resolve parental concerns without using its formal complaint process. By using District's "informal complaint" process, the building administrator and/or Superintendent are the final decisionmaker. Kansas law makes clear that the local school board is the final decision maker in the local dispute resolution process, not the building administrator and/or the superintendent.[18] Further, by requiring an informal complaint process before a parent may submit a formal complaint to the local school board within thirty (30) days of when the parent is informed of the incident, a district may intentionally delay the "informal complaint" process. This Hearing Officer is in no way insinuating that happened in this case. However, it is a general concern. A district should not want it to appear as if there is a possibility that it would interfere with a parent's right to file a complaint with the local board.

This Hearing Officer recognizes that the purpose of this administrative review is not to change or rewrite school policy. However, this Hearing Officer strongly recommends that District and any other Kansas school district utilizing a similar dispute resolution process remove references to an "informal complaint" process. To remove even more parental uncertainty about the dispute resolution process, this Hearing Officer also recommends that District create a model form that parents can fill out and submit to the local school board that indicates the parent is in fact filing a formal complaint. Nothing in Kansas law prevents District from requiring a specific form to be filled out as a means of submitting a formal complaint. This practice ensures that parents understand when a formal complaint has been submitted to the local school board. The Hearing Officer's last recommendation regarding District's dispute resolution process is to ensure that the dispute resolution process is reader friendly for all readers. Not all parents will be able to follow the legal-like dispute resolution process. Therefore, this Hearing Officer also encourages District to have a version that is more friendly to all types of readers.

[16] "The Board of education encourages parents to attempt to resolve issues relating to the use of ESI informally with the building principal and/or the superintendent before filing a formal complaint with the board. Once an informal complaint is received, the administrator handling such complaint shall investigate such matter, as deemed appropriate by the administrator." From GAAF-8.
[17] "If the issues are not resolved informally with the building principal and/or the superintendent, the parents may submit a formal written complaint to the board of education by providing a copy of the complaint to the clerk of the board and the superintendent within thirty (30) days after the parent is informed with the incident." From GAAF-8.
[18] K.A.R. 91-42-3(a)(2)(C).

Corrective Action

Although this administrative review did not reveal any unlawful use of emergency safety interventions, there were violations of Kansas law. The following corrective actions are necessary to ensure that District's local policies and procedures meet the requirements of Kansas law:

1. Staff should be trained on emergency safety intervention definitions and procedures under Kansas law. District may receive training from KSDE or the Kansas Technical Assistance System Network (TASN).[19] In addition, Superintendent, Director, Staff Member, Teacher, and School's administrator must review the following resources:
    a. ESI At-A-Glance.[20]
    b. PowerPoint on ESI Regulations.[21]
2. Remove items (e.g., filing cabinet, desk, chairs, other classroom items/objects) that could be a danger to any student who is secluded in the side room utilized in the event.
3. District administrators should double-check the work of whomever is responsible for reporting the use of emergency safety interventions to parents. This ensures that no steps or parts of necessary documentation are missed.
4. Give parents a specific form to fill out – like the form required by KSDE when requesting an administrative review – for formal complaints. The form should state important deadlines/timelines for the local dispute resolution process (e.g., when the form must be submitted).
5. Remove references to an "informal complaint" process from the local dispute resolution process.
6. Create a parent friendly version of the dispute resolution process so that all parents understand their rights and the dispute resolution process.

The District shall submit written verification to the Hearing Officer on or before Monday, September 21, 2026, confirming that all six corrective actions have been completed.

Signed,

Hannah Miller

Hannah Miller, Designated Hearing Officer
Kansas State Department of Education

[19] *See* https://ksdetasn.org/tickets/new.
[20] *See* https://docs.google.com/document/d/1QVpJSRHGNWZLN6vH_GWSFCNEhNsPLD2X/edit?usp=sharing&ouid=105759233509112000919&rtpof=true&sd=true.
[21] *See* https://docs.google.com/presentation/d/1ZCgmJkbynfdhxHxcR1hGakA6VEn5oaFo/edit?usp=sharing&ouid=105759233509112000919&rtpof=true&sd=true.