

STATE OF NEVADA
EMPLOYMENT SECURITY DIVISION
COMMISSION ON POSTSECONDARY EDUCATION

This meeting, conducted by the Commission on Postsecondary Education Chapter 394 of Nevada Administrative Code pursuant to Nevada Revised Statute NRS 394.383.

NEVADA COMMISSION ON POSTSECONDARY EDUCATION

Tuesday, February 5, 2019; 9:03 A.M.

Place of Meeting:	<u>Live Meeting:</u>	<u>Video Conference to:</u>
	DETR – SAO Auditorium	DETR – Stan Jones Building, Conf. Rm. A-C
	500 East Third Street	2800 E. St. Louis Avenue
	Carson City, Nevada 89713	Las Vegas, Nevada 89104

Department of Employment, Training and Rehabilitation (DETR) Staff
Present in Carson City

Kelly D. Wuest, Commission on Postsecondary Education (CPE) Administrator

Department of Employment, Training and Rehabilitation (DETR) Staff
Present in Las Vegas

Maricris Wu, CPE Education Specialist
Susan Beckett, CPE Administrative Assistant III

Members of the Public, Media and Other Agencies
Present in Carson City

None

Members of the Public, Media and Other Agencies
Present in Las Vegas

Robert Whitney, Nevada Attorney General Office Deputy Attorney General
Candace Balcom Paulino, Ace Insurance School of Nevada
Wendy DiVecchio, Greater Las Vegas Association of REALTORS
Amanda Luz Maria, Member of the Public
Armida Maldonado, Greater Las Vegas Association of REALTORS
Samuel Scheller, Guardian Elite Medical Services

Members of the Commission on Postsecondary Education
Present via remote access telephone call in

Larry Nathan (Nate) Clark, Vice Chair
Grant Nielson

Member of the Commission on Postsecondary Education
Present in Las Vegas

Sharon Frederick
Jill Hersha
Jon Ponder

Member of the Commission on Postsecondary Education
Not Present

BJ North, Chairperson
Rene Cantu

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STATE OF NEVADA
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February 5, 2019 – 9:03 A.M.

Call to Order

The meeting was held at the Department of Employment Training and Rehabilitation Conference Meeting Rooms, in Las Vegas, Nevada and the SAO Auditorium, Carson City (via video conferencing). The meeting was called to order by Vice-Chair Commissioner Clark at approximately 9:03 AM.

Public Comments

Vice-Chair Commissioner Clark stated, we will now open it up to Public Comment. Do we have any public comment in the South? Commissioner Frederick stated, yes, we have one person here in the South and it is Amanda Marin. Commissioner Clark stated, if you would come forward and if you would understand we cannot take action in the public comment agenda item. Amanda Luz Marin began speaking, I have a Bachelor's Degree in Health Administration and I am also a Medical Assistant. Ms. Marin began reading from a letter she prepared, see Exhibit 1. Commissioner Clark, it is my understanding comments are complete now? Commissioner Frederick, yes and that was our only public comment.

Commissioner Clark, is there anybody else from the public that would like to make comment?
No.

Confirmation of Posting

Susan Beckett, for the record, Administrative Assistant III, Employment Security Division, Commission on Postsecondary Education. Yes, proper Notice was provided for this Meeting pursuant to Nevada's Open Meeting Law, NRS 241.020 and confirmation of posting was received.

Open Meeting Compliance

For the record, this is Susan Beckett, again, Administrative Assistant III, Employment Security Division, Commission on Postsecondary Education, we are in compliance with the open meeting law.

Written Comments

Nate Clark, Vice-Chair Commissioner asked whether written comments were received. We do not have any written comments, Maricris Wu.

Roll Call

- Rene Cantu-Excused
- Vice Chair Nathan Clark-Present via conference call
- Sharon Frederick-Present
- Jill Hersha-Present
- Grant Nielson-Present via conference call
- Chair BJ North-Excused
- Jon Ponder- Present

This is Susan Beckett, roll has been taken and quorum has been confirmed.

Adoption of Agenda:

Motion: Commissioner Frederick -Motion to adopt the agenda, for February 5, 2019.

Second: Commissioner Hersha.

Discussion: None.

Results: Unanimous, agenda is adopted as presented.

Approval of Minutes November 7, 2018

Motion: Commissioner Hersha – Motion to approve the minutes from November 7, 2018 meeting.

Second: Commissioner Frederick.

Discussion: None.

Results: Unanimous, motion passes.

Administrator Kelly Wuest, just joined at SAO Auditorium. Commissioner Clark, just in time for Agenda item I, Administrator's Report. My apologies, I have been driving for an hour and a half in the snow. Commissioner Clark, did you drive in from Reno? Administrator Wuest, yes. Commissioner Clark, you should have just come to my office. Administrator Wuest, thank you. We have an individual coming here for a hearing today. She is attempting to arrive, but the weather is extremely volatile.

Administrators Report

Administrator Kelly Wuest gave the Administrators report:

1. Legislative Session

DETR has a unit responsible for monitoring and responding to fiscal notes and legislative requests.

CPE BDR – Related to the Commission and VA Education Benefits – Provides schools suspended from the VA Educational Benefits the ability to request a hearing concerning potential withdrawal from the program. Request would add an additional Commissioner representing veterans. Will provide bill number as available.

SB 32 – Related to Workforce Development - Expands the definition of "Employer" to include nonprofit organizations to participate in workforce programs to include recruitment, assessment and training. This expanded definition could permit nonprofit organizations to development postsecondary training programs without licensure.

2. School Updated and Closure

Art Institution of Las Vegas – On January 8, 2019, the Art Institute of Las Vegas received two campus level Show Cause Notices for placement and retention from ACICS requiring the submission of a teach out plan among other requirements. Upon hearing rumors of the local campus being closed, I visited AI finding the doors were open but Notice of Secure due to unpaid Clark County taxes. Dream Center Education Holdings, the owners of AI filed for receivership on Friday January 18, 2019 due to financial issues. CPE has participated in calls with DOE, other state regulators, and the accrediting bodies concerning the developments with the condition. Staff has requested information concerning the teach out proposal and legal filing.

Brightwood College closed the Las Vegas campus on December 7, 2018, after receiving a Withdrawal of Accreditation by Suspension notice from ACICS on December 4, 2018. Virginia College, LLC., the owners of Brightwood College had previously been granted receivership and was working on the sale of the school. The leadership of Brightwood College had been in communication with the Administrator and had devised a contingency plan in case a purchase of the school was not approved the U.S. DOE. The campus closed at the end of semester courses.

CPE has received a complete list of students attending at the time of closure, all transcripts and student ledgers. A total of 440 students were attending at closure including 41 student who complete a program of study and graduated. From the remaining 399 students, CPE has worked with several institutions to assist in providing final transcripts for transfer evaluations. There are two majors that do not have similar programs within Nevada and will if applicable participate in student indemnification: Practical Nursing and Medical Assistant with X-Ray Technician impact 119 students.

ITT Technical Institute – The bankruptcy proceeding from ITT Technical Institute is almost complete. Students who filed individual claims as part of the bankruptcy will receive settlements and the courts removed all student debt connected to loans that were connected to ITT Technical Institute. These actions will be complete within the next 60 days. I have requested information concerning students who will be impacted by both decisions as it will reduce the amount paid by the surety bond.

Other Closures

Nevada Dialysis and Technical School – granted a provisional license in August 2018 and never enrolled students. School voluntarily surrendered license.

Altierus College was purchased by the owner of National Technical Institute located in Las Vegas. The accrediting body has approved the new owners to restart the previously approved programs. The school has changed its name to Las Vegas College which was the one of the school's former names.

3. **Quarterly Report** – With 24 schools unreported, the total enrollment for the October 1, 2018 – December 31, 2018 quarter stands at 5,035 students.

Oct - Dec 2018	Oct - Dec 2017	Oct - Dec 2016	Oct - Dec 2015	Oct - Dec 2014
5,035	4,940	4,404	5,375	5,673

4. **CPE Quarterly Activities** – October 1, 2018 – December 31, 2018

CPE Activity	Number of Applications Processed	CPE Activity	Number of Applications Processed
License Renewals	18	Agent Permits	28
Experiential License	2	VA Compliance Visits/Other Visits	2
School Change of Ownerships	4	VA Program Approvals	235
Distance Education Exemptions	4	SARA Notifications	5
License Evaluations	12	School Audits	6

5. **CPE Student Complaints:** October 1, 2018 – December 31, 2018

School Name	Date Filed	Issues/Allegations	Findings	Status
Roseman University of Health Sciences	8/17/18	Quality of Education Failure to follow administrative process Inappropriate censorship		Investigation in process
Arizona College	12/8/18	Unfairly dismissed, failure to follow policies Mistreatment by faculty	School followed policies for student termination due to proof of student plagiarism	Closed

Administrator Wuest that concludes my administrators report.

Proposed changes to NAC 394.685 Termination or Continued Employment

This is Administrator Wuest, we are looking for possible action. There was a question regarding what was the appropriate number of years that are in this process? Right now, it is ten years, if you have committed a felony within the last ten years you must sit in front of the commission to determine if you will continue employment. We looked at everything we have done in the past, some of the data from 2015, we started collecting additional data as we went on so we have somethings that aren't specified as far as what the charges are and what occurred. The first page is what was presented last time. If you look at the second page there is a table tracking the backgrounds. What was proposed by the Director of DETR was three years and that was from the time of conviction. That is not from sentencing of a person. It is time of conviction, three years. This is what our data looks like.

Detailed Background Information	Number of Staff
Background Initiated	5,212
Backgrounds Completed	4,730
Background never completed/left employment prior to fingerprinting	482
Felony Convictions	180
Individuals terminated (for all reasons) prior to hearing	36
Approved by Administrator (with school support)	141
Hearing Conducted	3
Commission Approvals	2

	Not date specified	10 years +	8-10 years	5-7 years	3-4 years	Less than 3 years
Not Felony	16	14	11	16	9	3
No Longer employed	17	11	3	4	6	8
Approved By Commission			1			1
Denial by commission				1		
In process				1		4
School Closed	2					
Approved School/Admin (10+)		58				
	35	83	15	22	15	16

Administrator Wuest furthered, why this is important is some of the schools rely on this for their background process. Depending on what policies are in place, it may not suffice for the background process of the company and what the school is looking for. What we are looking for is a discussion for the small business impact.

Commissioner Clark asked, I was looking at this table and was not able to draw any conclusion and was hoping you would be able to give me some insight to help me out with that. It looks like you and I agree on that. What is the intent of this change, why was it proposed and what are we trying to achieve? Administrator Wuest responded, where the change came from, it came from Governor Sandoval's trying to provide opportunities to people who had convictions and to provide them a friendlier workforce, to these individuals. The problem is when you work in a school it is a position of trust as faculty member or administrator so there is an inherent risk that comes with it. One thing that is very interesting is there is two parts of the change. The first part of the change would make it where if a person is ever convicted of a felony they must notify the employer. The proposed change would eliminate that if it is beyond the number of years. If we just change half of it and change that part it would provide a (inaudible). It was then further requested by Director Soderberg that we reduce it in number of years. It was a double impact. Part of it was someone convicted of a DUI 35 years ago, how relevant is that to their employment and could that fact cause someone to leave employment or not be approved by their employer.

Commissioner Clark asked, would that regulation allow us to provide an explanation, their conviction and their situation since then and either the Administrator or CPE depending on the severity makes a judgement call on that correct? Administrator Wuest responded, yes, if it has been beyond ten years it first goes to the Administrator and if they don't agree with that decision then they can request a hearing. I have not had anyone request a hearing. I will tell you that most of the people who have had felonies with ten plus years it's been unrelated to their job. It's been drugs and DUI that is the majority of what I see. Many times, it is something that happened in youth and had nothing else on their record. There is nothing that indicates that

person has not changed their life. If you look at ten plus years approved by the schools and the administrator there was 58 individuals that never went to hearing.

There was also a big group of people who left employment and we do not know why they left employment. There was 482 people who left employment prior to finishing the background process. Commissioner Clark asked, we don't know why they left employment? Administrator Wuest replied, we don't know the reason why they left employment. Schools don't have to tell us. Commissioner Clark asked, so we have no real information that the reason for them leaving is the impact of the law as it stands on the books today. It almost feels like we are making an arbitrary change, it is really going to give people a better opportunity by moving to this three years?

This is Commissioner Hersha, when I look at the table I see that from five to seven years there was somebody who was denied by the commission and there is still one that is in process to me it would at least make more since to notify the seven years because the commission denied somebody during that time. If we stick with the three to four that would have never happened. Commissioner Clark, again that one is arbitrary because it happened to fall in the seven years old. What if it happened at eight years? Are we doing a service or dis-service by changing it to three years. Or five to seven years. Why would we want to change this? This is Commissioner Ponder, I wish there was a way that we would be able to see the folks who were going through the background process and left. I would be to see if there was an actual problem with the background or if it was another reason that made that decision. I think we should also take into consideration things that happened the last legislative session with regards to records seal. I think there is a lot of headway about what could be sealed and when those things could be sealed for those folks that had background challenges could be considered for opportunities. Commissioner Clark stated, I can give my own personal experience with this while running a school. I have had instances where I found out that an employee had a conviction through the Administrator and like she says for some reason that person is no longer there I can tell you that I'm not very surprised when I found out they had a background it almost makes sense they just left I'd wondered if the call or the letter from the Commission Administrator was the impetus to that person saying I'm not going to go through the hassle of fighting this thing, but I have no information to verify that it is just a gut feeling. Been doing this for 30 years and I can probably come up with a list of ten people which that situation has happened. This is Commissioner Hersha, I would agree with that. I think that those people who have backgrounds do job hop, they fight this all the time. When that background check comes through they probably aren't going to get that job offer. I do know that.

Commissioner Clark stated, I can also say that I have had a handful of employees that I have gone to bat for and attended a few hearings over the years to make an argument to allow them to remain employed and I have been successful every time I have gone and I don't waste my time with ones I don't feel comfortable with supporting them. I feel like the system is working. Administrator Wuest, can I add something? The first line where it states not a felony, those are

individuals where in their background, when their background came back it appeared they had been convicted of a felony. The time I had been dealing with individuals we have been able to determine either the charge had been dropped or it was not actually a conviction; in those cases, we were able to clean up their record. Some of the individuals had no knowledge of the information sitting out there and could clean up their backgrounds. That is one of the positive attributes to the background process is it gives individuals an opportunity to clean up their records. They don't make it to the commission until they have gone through that whole process and we give them ample time to gain all their records and clear up their records. This is Commissioner Frederick, thank you for that information, to me that is on the pro side for leaving it at ten years. Just because these errors that you have uncovered. Commissioner Clark stated, I wonder how much of our CPE resources is being devoted to that. It is not the job of the CPE to help people expunge their record. It's nice that it happened, a side benefit, but it is not really the job of the Administrator to help people with their backgrounds. Administrator Wuest replied, how we help is informing them. If I am sending out a letter I am having to do it anyway. They call in and most of them don't understand they ask, what are you talking about? I take them back to the charge and they must provide information. It is no more work than not. Most of the time it is a conversation that is had. Ultimately, it is easier, you are not having them come to the commission meeting. Commissioner Clark furthered, if resources are not being tied up. I am in total favor of that as a side benefit.

Commissioner Clark asked Mr. Whitney, do we need to make a motion if we don't want this to proceed. Mr. Whitney replied, if the Commission does not want a change with NAC 394.685 no action would be taken, it dies. Commissioner Clark, if we want to go status quo we don't make a motion. If we want to make a change we can make a motion. We can make a motion for any number of years that we want, is that correct Ms. Wuest? Administrator Wuest replied, yes, it is. Commissioner Clark stated those are the options on the table. Based on that I would like to ask for a motion.

Motion: No motion.

Commissioner Clark, stated being no motion agenda item J would then be tabled? Is that correct? Mr. Whitney responded, I don't know if tabling is the correct word. I believe tabling will bring it up again later. It would die. Commissioner Clark, then alright the motion dies.

Gold Star Gaming Student Refunds

Administrator Wuest updated the commission. At the November 2018 Commission Meeting, a past Gold Star Gaming School student made a public comment concerning student indemnification and the Commission requested an update at the next meeting.

A second request for surety was made in January 2019 to Hudson Insurance Company in the amount of \$6,742 for 17 students. While many of the student's enrollment contract had expired

prior to the close of the school, the management of Gold Star Gaming failed to enforce attendance and student progress. The claims submitted were for only those students who according to the school attended the time of closure. Commissioner Clark stated, that is an interesting twist. Administrator Wuest responded, I know there was only three students who had valid claims and attending at closure. All the students who had filed claims, all had the exact same story. We were able to confirm the story with her. It is one of the reasons why you should stick to your enrollment agreement. Commissioner Clark stated, yes, it is also a legal document. Administrator Wuest, most of her students were international students, who I don't think really did understand the whole process. Probably 95% were limited English.

This is Commissioner Frederick, then what would be the time frame is they refuse to pay. If Hudson Insurance Company refused to pay. Administrator Wuest replied, if they refuse to pay? If Robert Whitney could respond, I don't know if we must come back and do a new Motion of Findings of Fact Conclusions of Law. If we did it would be heard in May. I don't know if we need to do that, I haven't experienced that yet and didn't find it in past records. This is Robert Whitney, it might just be best for record purposes to come back with Findings of Fact to memorize it, for action by the Commission and Student Indemnification. Commissioner Clark asked, so it is in our best interest to provide the Findings of Fact for the May meeting. Unless, you get information before then. Mr. Whitney, yes.

Applications for Full Term License

Ace Insurance School of Nevada

Testified: Candace Balcom-Paulino, Owner gave information about her school. Twenty-seven students who graduated from my school are in full time employment, one student who is part-time employed, and nine people who are self-employed as either an Agent or a Broker. I currently have seven students are currently preparing to take their state exam and six students who are retaking their state exam and two students who withdrew from the course.

Discussion: Commissioner Clark asked, you mentioned six students are retaking their exam. Does the school offer any assistance or anything when preparing for that exam? Ms. Balcom-Paulino responded, absolutely. Some of the students who are taking this course just barely graduated high school and taking this college based course, they struggle with it. I make an extra effort to help these students on the side and out of the classroom. Wednesday is the day they can come in and obtain assistance, I offer the private one on one. Commissioner Ponder asked, retaking the exam, is there a time frame on retaking the exam? Ms. Balcom-Paulino responded, they can reschedule with Pearson Vue depending on the time of year and the other industries would depend on the time frame, scheduling can vary. Commissioner Ponder asked, general rule? Ms. Balcom-Paulino replied, the students who took my class and my final was at a 95% I tell them to schedule the test. The other students I suggest they come in on Wednesday and I will work with them because they need a little extra time.

Motion: Commissioner Frederick – A motion that Ace Insurance School of Nevada be granted full term licensure.
Second: Commissioner Hersha.
Discussion: None.
Results: Unanimous.

All About Caring

Testified: None.
Discussion: Administrator Wuest – we advised Ms. Bachman not to travel. She lives in rural Nevada and the normal time would be over an hour, so she is not attending due to weather. Commissioner Clark stated, she does not need to be here. Administrator Wuest furthered, she had her audit the day before our last meeting and her audit was clean. She has provided us with her placements and 100% of her students are placed. This is Commissioner Ponder, it looks like they had enrolled 64 students and they all have job offers? Administrator Wuest, yes.

Motion: Commissioner Hersha– A motion that All About Caring be granted full term licensure.
Second: Commissioner Ponder
Discussion: None.
Results: Unanimous.

Guardian Elite Medical Services

Testified: Samuel Scheller, CEO Guardian Elite Medical Services, gave background and information about his company and school.
Discussion: Commissioner Clark asked, so am I to understand that your school is there to train employees that are going to work for you or are you placing students with other ambulance services? Mr. Scheller replied, we are placing with other ambulance services. We are talking with American Medical Response and other job postings when other agencies are hiring. Commissioner Clark stated, I understand there were a few findings in your audit. Maybe you could give a little background on that? Mr. Scheller replied, yes sir, one of the findings was we were not tracking jobs. We now have a job placement spreadsheet that was provided by the Commission to track students. We failed to sign the enrollment agreement. We now have procedures in place to make sure that gets signed. Commissioner Ponder, how long do you track them for? Mr. Scheller we are set up with mail chimp where we blast out to all our past students a survey. Commissioner Frederick, with your other courses for the public how has your response been? Mr. Scheller, we offer refresher courses and multiple other courses and they are being filled.

Motion: Commissioner Frederick– A motion that Guardian Elite Medical Services be granted a full-term licensure.
Second: Commissioner Hersha.
Discussion: None.
Results: Unanimous.

Applications for Initial Provisional Licensure

Charter College

Testified: No representative present.

Discussion: Administrator Wuest, stated Charter College requested yesterday afternoon to be removed from the agenda. They have done some analysis of the degrees and determined this may not be the best fit for the Reno area. They asked if they could be taken off the agenda and give a different proposal for other courses. Commissioner Clark, we made a motion earlier to adopt the agenda. Do we need to make a motion to remove them from the agenda? Mr. Whitney responded, no we shouldn't. Commission Clark replied, okay thank you.

Greater Las Vegas Association of REALTORS

Testified: Wendy DiVecchio, Owner and Armida Maldonado, Education Director who will be overseeing the program. They gave a description and background of the proposed school. The Greater Las Vegas Association of REALTORS has been around since 1947.

Discussion: Commissioner Hersha asked, what kind of placement and career services will you offer to your students? Ms. DiVecchio replied, we will be offering brokers to be able to come in and do presentations to our students. We are planning this as a luncheon where we will be providing lunch and the brokerages can come in and discuss their offices. Other than offering options we cannot place them with a brokerage because that would be a conflict of interest with the association. This is Commissioner Hersha again, what is your plan for advertising and recruiting? Ms. DiVecchio responded, I am working with a web developer for the website. We will be advertising through the website, the real estate division, also with the Review Journal, and the Nifty Nickel. Commissioner Hersha, what is the eligibility for enrollment? Ms. Maldonado responded, high school diploma or a GED is required.

Motion: Commission Frederick – I'd like to make a motion that a twelve-month provisional license be granted to Greater Las Vegas Association of REALTORS, to offer pre-licensing courses in the 90-hour real estate program contingent upon facility information and curriculum approval by the Nevada Real Estate Division.

Second: Commissioner Ponder.

Discussion: None.

Results: Unanimous, motion carries.

Southeastern University

Testified: No one in attendance, no action taken.

Discussion: Commissioner Clark, do we need them to be in attendance for approval? Mr. Whitney, I believe we do have to have someone present to answer questions.

Order to Refund

Brightwood College

Discussion: Commissioner Clark, do we need to have discussion or do we just make a motion? Mr. Whitney, there is usually some background information given. Commissioner Clark, I will print this out and sign it. Do you need an original signature? Administrator Wuest, I will need the original signature, so if you could sign it and place it in the mail that would be fine. We are not in a rush because this will go in with the claims. Commissioner Clark, alright. Administrator Wuest furthered with the Findings of Fact, Conclusion of Law and Order giving additional background information.

Motion: Commissioner Frederick – The Vice-Chair of the Commission on Postsecondary Education to sign the Order to Refund in order to attach surety bond 800-03-00-57.

Second: Commissioner Hersha.

Discussion: None.

Results: Unanimous, motion carries.

Application for Continued Employment

Professional Institute of Technology (Roselle Hawegawa)

Discussion: Mr. Whitney stated, Administrator Wuest can confirm this, but I believe the person who was supposed attend has not arrived. Administrator Wuest responded, she has not arrived yet to the offices here. Commissioner Clark asked, should we table this until the May meeting? Mr. Whitney stated, Vice-Chair that is probably the best thing to do unless she has contacted staff. Commissioner Clark, has staff heard from her? Administrator Wuest responded, I had talked to her this morning and she was trying to drive over here but, the snow is coming down very hard. Commissioner Clark asked, if we table this for another quarter will that affect her employment? Administrator Wuest responded, the snow is coming down very hard here, they may have closed the road. I can conceivably see why she may not be here. There is very poor weather conditions. As far as employment goes, she is to stay employed until she is heard, that is her due process. That will also allow her school to give us feedback on how her employment is going. Commissioner Clark, I say we table until May meeting due to snow and possible road closure. Do we need a motion to table it or is that just procedural? Mr. Whitney, I believe that is something we can handle is procedurally.

Commission Comments

None.

Public Comment

Amanda Luz Maria, addressed the Commission again. I came here because I care about children. I was working for Clark County School District for 13 years. They don't care about the children. This is why I'm here. The children have to know how to read and write, school to postsecondary school or university. What is important because unemployment maybe unemployed. I am here because what I saw proposed changes to NAC 394.685 Termination or Continued Employment. Any person who was unemployed. I am one of those unemployed, the unemployment department didn't review my case, it is not justice because they didn't pay unemployment. Whatever the school district provides to them and I want your office to investigate my case. Husband and wife unemployed, is that good? How do you become with solutions? Thank you. (Parts of the above comments were inaudible due to Ms. Maria standing during the final comments and shuffling of papers she had while speaking to the Commission.)

No further comments.

Meeting Adjourned

The meeting was adjourned by Commissioner Clark. Time: 10:26 AM.

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