

C.P. v. New Jersey Department of Education

Civil Action No. 19-cv-12807-NLH-MJS

Final

COMPLIANCE REPORT #3

July 1, 2025

Submitted by

Lenore Knudtson
Compliance Monitor

I. Overview

Now over a year into compliance reporting on the Consent Decree, both NJDOE and OAL report an improved working relationship with one another. NJDOE staff described it as a true, collaborative relationship for the first time. Working together, rather than separately, is a first step in long term change on behalf of the students with disabilities and their parents in New Jersey.

NJDOE and OAL continue to meet regularly with the Compliance Monitor and with each other. The due process hearing system has changed as a result. The data contained in this report demonstrates positive growth as documented and described herein.

It is important to note that this report covers five months of data collection, rather than the typical four month reporting cycle. The additional month was included because of the initial month long delay in reporting data from OAL. Now that its data collection system is producing comprehensive, albeit manually compiled data, it was possible to offer a more comprehensive report.

II. Summary of Initiatives, Interventions, and Corrective Actions

To date, the parties have implemented the following recommendations:

- Contemporaneous notice from NJDOE to OAL when a due process hearing request is filed at NJDOE. Improving communication was a first step in the journey to rebuilding a compliant due process hearing system. Likewise, inclusion of NJDOE on the distribution list for copies of all adjournments, orders, and decisions provides valuable information for NJDOE to track the status of cases within its due process hearing system.
- Immediate transmittal upon a public agency filing of a due process hearing request. Considerable progress had been made on this action, which directly impacts on-time performance of OAL. In the past, a delayed transmittal on a district filed due process hearing request resulted in OAL often receiving the case after the decision deadline had already passed. The data will demonstrate that this rarely occurs during the current reporting period.

- Improved tracking of resolution timelines to ensure transmittal consistent with N.J.A.C. 6A:14-2.7(h). Delayed case transmittal rarely occurs in this reporting period, permitting OAL to begin working on a matter in a much more timely manner.
- Use of the Adjournment Form to meet all minimum requirements of the Settlement Agreement. Use of the Adjournment Form has improved. It is anticipated that the Adjournment Form will continue to be used to document the life cycle of every due process matter.
- Utilizing ALJs to conduct due process related mediation was a significant change to the process. Mediations are being scheduled in a timely manner. During the most recent meeting with NJDOE, no concerns were noted. Scheduling was prompt, and no concerns had been raised with NJDOE.

**III. Data Collected During the Reporting Period from
December 2024 through April 2025**

The Compliance Monitor received the following due process data from NJDOE:

- Filing dates,
- Case numbers and names,
- Resolution period and extensions,
- Mediation dates,
- OSE disposition, and
- Transmittal dates.

The Compliance Monitor received the following due process data from OAL:

- Copies of all Adjournment Forms,
- Copies of all decisions issued in due process matters,
- Copies of all transmittal forms received from NJDOE,
- Reset case status and pending events,
- Pending cases,
- Newly opened cases, and
- Closed cases.

The data is provided in spreadsheet format. To date, there is no searchable database with real time data collection. Although the spreadsheets are helpful, all data verification and cross referencing is completed manually. NJDOE and OAL have been available to answer the Compliance Monitor's questions, provide clarification as needed, and provide additional documentation as needed.

A. NJDOE Monthly Data

Each month from December 2024 to April 2025 is compiled and summarized below, including the number of new cases for the month, cases withdrawn or resolved prior to transmittal, the number of transmittals for new cases as well as all prior month's cases transmitted in that month, analyzed for timeliness. The purpose of closely analyzing transmittal data is to understand the root causes of late due process decisions issued beyond the 45 day timeline, or properly extended timeline. Delayed transmittals have previously contributed to the potential for late due process decisions. Considerable growth was made, with the vast majority of cases transmitted from NJDOE to OAL in a timely manner.

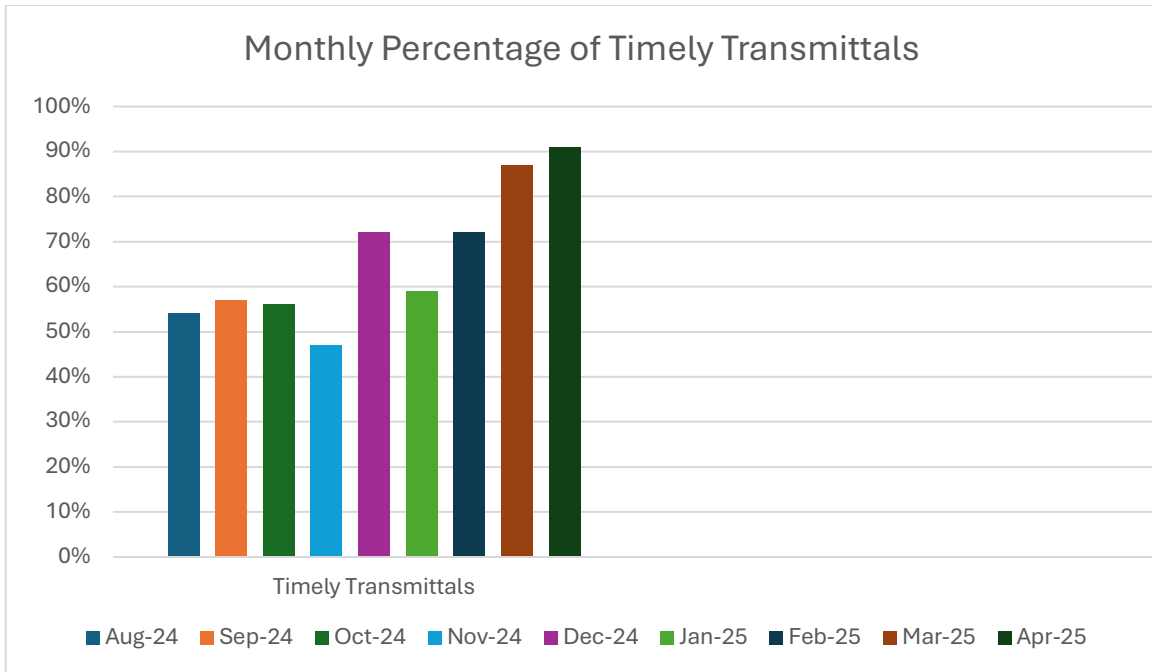
DECEMBER 2024 DATA						
Number of New Cases	Cases Resolved/Withdrawn Prior to Transmittal			Number of Transmittals for New Cases		
74	4			9		
NJDOE Transmittals						
Original Filing Month	Number of Cases Transmitted in December 2024	Transmitted Timely with NO Extension	Transmitted after Resolution Extended for Mediation	Percent Timely	Resolution Improperly Extended	Percent Late
September 2024	2	0	2	100%	0 0 – settlement conf. 0 – district filing 0 – late unknown	0%
October 2024	8	0	5	63%	3 0 – settlement conf. 0 – district filing 3 – late unknown	37%
November 2024	17	2	8	59%	7 0 – settlement conf. 0 – district filing 7 – late unknown	41%
December 2024	9	9	0	100%	0 0 – settlement conf. 0 – district filing 0 – late unknown	0%
TOTAL	36	11	15	72%	10	28%
COMPARISON	<p>OAL Receipt of Transmittals in December 2024 36 DOE transmittals vs. the 37 transmittals received by OAL. This difference could be attributed to duplication of cases at OAL due, in part, to partial transmittals for sufficiency challenges or emergent relief, expedited discipline matters, settlement conferences, or cases filed under Section 504.</p>					

JANUARY 2025 DATA						
Number of New Cases	Cases Resolved/Withdrawn Prior to Transmittal			Number of Transmittals for New Cases		
67	15			9		
NJDOE Transmittals						
Original Filing Month	Cases Transmitted January 2025	Transmitted Timely with NO Extension	Transmitted after Resolution Extended for Mediation	Percent Timely	Resolution Improperly Extended	Percent Late
September 2024	1	0	1	100%	0 0 – settlement conf. 0 – district filing 0 – late unknown	0%
October 2024	2	0	1	50%	1 0 – settlement conf. 0 – district filing 1 – late unknown	50%
November 2024	20	0	11	55%	9 6 – settlement conf. 2 – district filing 1 – late unknown	45%
December 2024	29	8	6	48%	15 1 – settlement conf. 2 – district filing 12 – late unknown	52%
January 2025	9	9	0	100%	0 0 – settlement conf. 0 – district filing 0 – late unknown	0%
TOTAL	61	17	19	59%	25	41%
COMPARISON	<p>OAL Receipt of Transmittals in January 2025 61 OSE transmittals vs. the 68 transmittals received by OAL. This difference could be attributed to duplication of cases at OAL due, in part, to partial transmittals for sufficiency challenges or emergent relief, expedited discipline matters, settlement conferences, or cases filed under Section 504.</p>					

FEBRUARY 2025 DATA						
Number of New Cases	Cases Resolved/Withdrawn Prior to Transmittal			Number of Transmittals for New Cases		
91	19			22		
NJDOE Transmittals						
Original Filing Month	Cases Transmitted February 2025	Transmitted Timely with NO Extension	Transmitted after Resolution Extended for Mediation	Percent Timely	Resolution Improperly Extended	Percent Late
October 2024	1	0	1	100%	0 0 – settlement conf. 0 – district filing 0 – late unknown	0%
November 2024	3	0	2	67%	1 0 – settlement conf. 0 – district filing 1 – late unknown	33%
December 2024	10	0	6	60%	4 0 – settlement conf. 1 – district filing 3 – late unknown	40%
January 2025	25	13	6	76%	6 0 – settlement conf. 1 – district filing 5 – late unknown	24%
February 2025	22	22	0	100%	0 0 – settlement conf. 0 – district filing 0 – late unknown	0%
TOTAL	61	25	19	72%	11	18%
COMPARISON	<p>OAL Receipt of Transmittals in February 2025 61 OSE transmittals vs. the 65 transmittals received by OAL. This difference could be attributed to duplication of cases at OAL due, in part, to partial transmittals for sufficiency challenges or emergent relief, expedited discipline matters, settlement conferences, or cases filed under Section 504.</p>					

MARCH 2025 DATA						
Number of New Cases	Cases Resolved/Withdrawn Prior to Transmittal			Number of Transmittals for New Cases		
79	13			19		
DOE Transmittals						
Original Filing Month	Cases Transmitted March 2025	Transmitted Timely with NO Extension	Transmitted after Resolution Extended for Mediation	Percent Timely	Resolution Improperly Extended	Percent Late
October 2024	1	0	1	100%	0 0 – settlement conf. 0 – district filing 0 – late unknown	0%
December 2024	5	0	4	80%	1 0 – settlement conf. 0 – district filing 1 – late unknown	20%
January 2025	8	0	3	38%	5 0 – settlement conf. 0 – district filing 5 – late unknown	62%
February 2025	34	20	11	91%	3 0 – settlement conf. 0 – district filing 3 – late unknown	9%
March 2025	19	19	0	100%	0 0 – settlement conf. 0 – district filing 0 – late unknown	0%
TOTAL	67	39	19	87%	9	13%
COMPARISON	<p>OAL Receipt of Transmittals in March 2025 67 OSE transmittals vs. the 69 transmittals received by OAL. This difference could be attributed to duplication of cases at OAL due, in part, to partial transmittals for sufficiency challenges or emergent relief, expedited discipline matters, settlement conferences, or cases filed under Section 504.</p>					

APRIL 2025 DATA						
Number of New Cases	Cases Resolved/Withdrawn Prior to Transmittal			Number of Transmittals for New Cases		
95	2			25		
DOE Transmittals						
Original Filing Month	Cases Transmitted April 2025	Transmitted Timely with NO Extension	Transmitted after Resolution Extended for Mediation	Percent Timely	Resolution Improperly Extended	Percent Late
September 2024	1	0	1	100%	0 0 – settlement conf. 0 – district filing 0 – late unknown	0%
January 2025	6	0	6	100%	0 0 – settlement conf. 0 – district filing 0 – late unknown	0%
February 2025	8	1	3	50%	4 0 – settlement conf. 0 – district filing 4 – late unknown	50%
March 2025	30	27	1	100%	2 0 – settlement conf. 0 – district filing 2 – late unknown	7%
April 2025	25	25	0	100%	0 0 – settlement conf. 0 – district filing 0 – late unknown	0%
TOTAL	70	53	11	91%	6	9%
COMPARISON	<p>OAL Receipt of Transmittals in April 2025 70 OSE transmittals vs. the 75 transmittals received by OAL. This difference could be attributed to duplication of cases at OAL due, in part, to partial transmittals for sufficiency challenges or emergent relief, expedited discipline matters, settlement conferences, or cases filed under Section 504.</p>					



Late transmittals for scheduling settlement conferences are no longer a contributing factor to OAL commencing due process cases in a timeline manner. Similarly, district filed due process hearing requests are immediately transmitted, as the resolution period does not exist in these matters. The only documented delay in transmittals seemed to be random without any clear indication of a root cause. Although the NJDOE data is greatly improved and represents substantial compliance with N.J.A.C. 6A:14-2.7(h), it is recommended that the agency undertake a review of the unexplained delayed transmittals and put safeguards in place to ensure timely transmittals moving forward.

B. OAL Data Summary

OAL continues to collect and report all data requested without the benefit of an automated data collection system. The last update reported that deployment concerns have been resolved, and a training schedule for in-person training is being developed. OAL anticipates a go-live date in early September. When that system is online, the Compliance Monitor will be able to readily ascertain the age of a case from filing to conclusion.

Without some type of automated system, data is manually pulled from respective case files, and compiled on a spreadsheet, making it impossible to track the “age” of a case

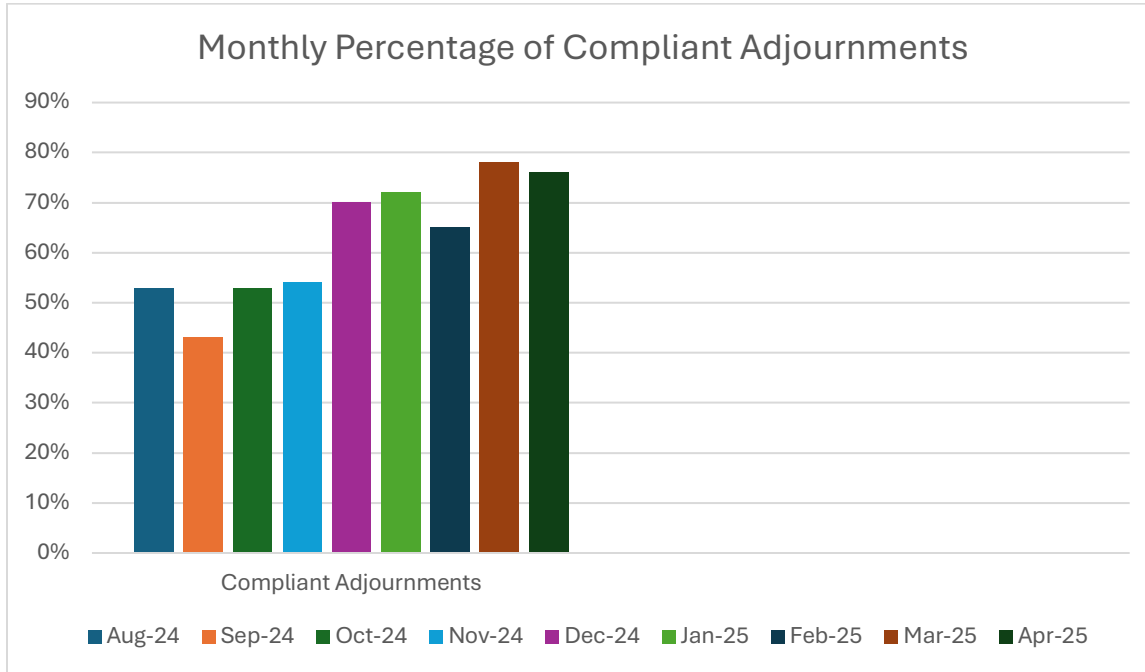
on any given date. The completed Adjournment Forms are a major source of information for determining compliance with appropriately extended due process timelines. For this report, all Adjournment Forms were reviewed to provide critical information regarding the timeliness of every due process matter. Also, the accuracy of the data contained in each Adjournment Form is dependent on accurate and thorough documentation within the form. Therefore, forms without the critical required information to determine the length of an extension and a new decision deadline were considered noncompliant. The following table represents a detailed analysis of adjournments from August to November 2024.

OAL ADJOURNMENT DATA					
Month	Number of Adjournments	Range of Days Hearing Deadline Was Extended	Number of Noncompliant Adjournments[^]	Number of Compliant Adjournments[*]	Percentage of Matters Properly Adjourned
December 2024	69	1 – 172	21 0 – ALJ initiated 13 – No ext. length 13 – No new due date 14 – Incorrect date calculation	48	70%
January 2025	54	3 – 67	15 0 – ALJ initiated 11 – No ext. length 13 – No new due date 4 – Incorrect date calculation	39	72%
February 2025	43	7 – 100	15 0 – ALJ initiated 10 – No ext. length 10 – No new due date 3 – Incorrect date calculation	28	65%
March 2025	64	2 – 99	14 1 – ALJ initiated 6 – No ext. length 6 – No new due date 6 – Incorrect date calculation	50	78%
April 2025	59	2 – 130	14 1 – ALJ initiated 5 – No ext. length 6 – No new due date 5 – Incorrect date calculation	45	76%
Total	289	N/A	79	210	73%

SUMMARY	Each adjournment form was reviewed to verify appropriate extensions to the decision deadline. Missing fields and incorrect date calculations account for most errors.
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^ Adjournment forms may be noncompliant for more than one reason.

* Substantial compliance with Adjournment Form determined by confirming the extension resulted from the request of a party, was granted by the ALJ, documented the length of the extension, and provided a new decision due date.



RESET CASES

Pursuant to paragraph 11 of the Consent Decree, all pending cases that existed on the date the Decree was approved by the Court were reset and the timeline for each case began on the calendar day immediately following approval of the Decree. At the time of the April data submission by OAL, 25 Reset Cases remain active out of the 188 cases originally reset. In response to a request for updated information on the remaining 25 cases, OAL provided an update:

- 6 of the 25 cases are closed, including the oldest 2019 matter.
- 2 are on “Heard - record closed” status, awaiting issuance of final decision.
- 2 are on “Heard - record open” status, which usually means the ALJ is awaiting briefs from the parties.
- 11 cases have upcoming dates scheduled.
- 1 case had recent event activity.
- 3 cases require additional follow up to further update status.

As required by the Consent Decree, the Compliance Monitor reports on specific data points. The following table represents the mandatory compliance data as specified in the Consent Decree:

Final Decisions – Post Full Hearing (Emergent and expedited hearings excluded.)			
Month	Number of Cases	Case Summary	Compliance
December 2024	6	EDS 00607-20 (consolidated). Petition: 1/18/2021. Decision: 12/9/2024. Filing predates use of Adjournment Form. Unable to verify compliance.	Noncompliant
		EDS 00789-24. Petition: 11/21/2023. Decision: 12/1/2024. Filing predates use of Adjournment Form. Unable to verify compliance.	Noncompliant
		EDS 07015-24. Petition: unknown. Transmittal: 5/28/2024. Decision: 12/11/2024. Filing predates use of Adjournment Form. Unable to verify compliance.	Noncompliant
		EDS 13556-23. Petition: unknown. Transmittal: unknown. Decision: 12/16/2024. Filing predates use of Adjournment Form. Unable to verify compliance.	Noncompliant
		EDS 12855-24. Petition: 7/3/2024. Transmittal: 9/12/2024. Decision: 12/4/2024. Adjourned in September 2024 until the end of October 2024.	Noncompliant
		EDS 05894-24 (consolidated). Petition: unknown. Transmittal: 10/20/2022 and 5/6/2024. Decision: 12/11/2024. Filing predates use of Adjournment Form. Unable to verify compliance.	Noncompliant
January 2025	1	EDS 05885-24. Petition: 4/1/2024. Transmittal: 5/3/2024. Decision: 1/24/2025. Filing predates use of Adjournment Form. Unable to verify compliance.	Noncompliant
February 2025	1	EDS 03637-22 (consolidated). Petition: 4/15/2022. Transmittal: 5/8/2022. Decision: 2/20/2025. Filing predates use of Adjournment Form. Unable to verify compliance. "The hearing had been the subject of numerous delays caused by actions or requests of petitioner and petitioner (and then counsel [name]) had been cautioned numerous times that the scheduled date would proceed."	Noncompliant
March 2025	5	EDS 03954-24. Petition: 2/14/2024. Transmittal: 3/25/2024. Decision: 3/14/2025. Filing predates use of Adjournment Form. Unable to verify compliance.	Noncompliant
		EDS 04008-24. Petition: 1/19/2024. Transmittal: 3/3/2024. Decision: 3/12/2025. Filing predates use of Adjournment Form. Unable to verify compliance.	Noncompliant
		EDS 04674-23. Petition: 5/15/2023. Transmittal: 5/30/2023. Decision: 3/3/2025. Filing predates use of Adjournment Form. Unable to verify compliance.	Noncompliant
		EDS 12502-24. Petition: 4/22/2024. Transmittal: 9/6/2024. Decision: 3/4/2025. No adjournment forms located. Approximately 11/14/2024: "In order to provide the petitioners with sufficient time to obtain legal counsel, the hearing was adjourned until January 25, 2025."	Noncompliant
		EDS 10964-24. Petition: 2/17/2024. Transmittal: 8/8/2024. Decision: 3/28/2025. August 2024 Adjournment Form: Decision deadline extended from 9/15/2024 to 11/26/2024. No further adjournments on record. "At the parties' request, the following additional hearing dates were added: November 15, 2024, November 21, 2024, December 3, 2024, December 11, 2024, and December 13, 2024. The parties mutually requested additional	Noncompliant

		time to request transcripts of the hearing dates and to provide written summation briefs. By agreement of the parties the summation briefs were due on February 28, 2024.” Compliance cannot be confirmed.	
April 2025	2	EDS 00782-24. Petition: 12/29/2023. Transmittal: 1/19/2024. Decision: 4/4/2025. Filing predates use of Adjourment Form. Unable to verify early compliance. November 2024 Adjourment Form: Decision deadline extended from 12/26/2024 to 3/11/2025. January 2025 Adjourment Form: Decision deadline extended from 3/11/2025 to 4/4/2025. April 2025 Adjourment Form: Decision deadline extended from 4/4/2025 to 4/7/2025.	Compliant
		EDS 13169-24. Petition: 7/16/2024. Transmittal: 9/20/2024. Decision: 4/15/2025. October 2024 Adjourment Form: Decision deadline extended from 10/20/2024 to 12/4/2024. November 2024 Adjourment Form: Decision deadline extended from 12/4/2024 to 2/12/2025. Continuance on record 1/21/2025.	Compliant

* Use of Adjourment Forms commenced in July, with sporadic use noted until August 2024. It is impossible to calculate timeliness prior to the use of Adjourment Forms. Compliance determinations based on data after use of the Adjourment Form commenced.

Final Decisions – No Full Hearing (Emergent and expedited hearings excluded.)				
Month	Number of Compliant Cases	Number of Noncompliant Cases	Summary	Compliance Percentage
December 2024	7	31	Little case data is available for Final Decisions with no full hearing. Many cases commenced prior to the regular use of the Adjourment Form.	18%
January 2025	9	22		29%
February 2025	21	10	Many of the newer cases have Adjourment Forms documenting deadline extensions as opposed to earlier cases with little documentation. The Adjourment Forms are used by the Compliance Monitor to confirm properly extended due process timelines.	68%
March 2025	28	20		58%
April 2025	14	9		61%

* Use of Adjourment Forms commenced in July, with sporadic use noted until August 2024. It is impossible to calculate timeliness prior to the use of Adjourment Forms. Compliance determinations based on data after use of the Adjourment Form commenced.

The above data demonstrates that use of the Adjournment Form has had a positive impact on compliance with mandatory timelines for due process hearings. From December 2024 to April 2025, an upward trend in compliance is confirmed.

SPECIFIC COMPLIANCE DATA		
Month	Number	Pending Cases (Aggregate) % Compliant Within 45 day Timeline*
December 2024	214	At the current time, there is no practical way for the Compliance Monitor to track the timeliness of all pending cases. The Adjournment Form was not regularly used until August 2024, and although improved, compliance with the use of the form was initially weak. Until the database becomes available, much of this data does not exist in a mineable, extractable form.
January 2025	213	
February 2025	240	
March 2025	266	
April 2025	210	

IV. Hypothesis of Causes and Barriers

Several different hypotheses and barriers are offered by the Compliance Monitor when examining the due process hearing data in New Jersey for timeliness with the 45-Day Rule.

1. No uniform data collection or record keeping system exists to track due process hearing requests from filing through to conclusion. This continues to be a barrier today. Collecting data manually on spreadsheets is an important component in the current system, but it falls far short of the power within a data-based system to provide timeline alerts, verify data entries, elevate cases to an administrator

when noncompliant events occur, and most importantly, extract real-time data from within the system.

2. Continued use of the Adjournment Form, or a streamlined version of the Adjournment Form to further increase use and accuracy. Non-uniform use and incomplete documentation have diminished its potential value, resulting in lower compliance rates. Within the five months of data analyzed for the report, considerable variability exists in how ALJs complete the form, representing a knowledge gap among the various ALJs. Continued training on the mandatory use of the form is critical to improving thoroughness and accuracy.
3. Expedite, to the extent feasible, the go-live date for the automated due process data collection system.

V. Summary of NJDOE Actions to Address Noncompliance to Date

NJDOE and OAL have fully implemented all Compliance Monitor recommendations to date to increase the veracity and reliability of data collection to give a true picture of timeliness of due process hearings. The following additional actions have been undertaken to improve the New Jersey due process hearing system:

1. **NJDOE and OAL weekly collaboration meetings.** Both agencies regularly participate in weekly meetings to increase communication and problem solve potential issues. The meetings have been described as “true collaboration” by NJDOE participants. The meetings are ongoing, productive, and are emblematic of true change within New Jersey’s due process hearing system.
2. **Inclusion of ALJs on the NJDOE mediation roster.** In order to facilitate the use of ALJs as IDEA mediators, NJDOE has included the selected and trained ALJs on its IDEA mediation roster. NJDOE reported timeliness of scheduling, with no negative feedback from participants.
3. **NJDOE tracks and monitors the resolution period with increased accuracy.** NJDOE added data fields to its regular data collection to provide insight on transmittals at the conclusion of the resolution period.

4. **Modification of forms.** NJDOE refined its forms used to provide notice to OAL of all cases at the time of filing and distinguish that process from actual transmittal.
5. **Dedication of staff and resources.** NJDOE dedicates staff and resources within its own office and within OAL to address the necessary improvements.

VI. Summary of NJDOE Future Actions to Rectify Noncompliance

NJDOE continues to take the initiative to improve its due process hearing system. NJDOE has committed to dedicating time, collaborative efforts, resources, and staff to making the necessary changes to bring the due process hearing system into compliance with the 45-Day Rule.

VII. Recommendations for Compliance

The Compliance Monitor recommends the following actions for NJDOE and OAL:

- Reinforce the necessity of ALJs consistently and thoroughly completing an Adjournment Form with each extension of the 45 day timeline.
- Drill down to discover any barriers to on time transmittals in the few remaining matters where transmittals were late, delaying OAL's active involvement in the matter.
- Dedicate staff and resources to eliminate delays, where feasible, in implementing the data-based record system for due process hearing.

VIII. Response to Comments

On June 11, 2025, class counsel submitted a letter of concern to the court monitor. Barriers to compliance were outlined in the letter. The court monitor sought information from NJDOE and OAL on the barriers identified by class counsel prior to completing the report. They are addressed below.

- **Failure to comply with electronic survey requirement.** The court monitor does not believe that NJDOE has failed to comply with the electronic survey requirement. NJDOE provides the survey link on each adjournment form but requiring the ALJs to complete the survey adds another step to the adjournment process that is disconnected from actual timeline compliance. To date, the court

monitor received confirmation that 122 surveys have been completed. Because the court monitor reviews each and every adjournment form, the data gleaned from those actual forms is much more comprehensive and accurate than information compiled from the surveys. Data from the actual adjournment forms is included with each compliance report.

- **Unwarranted delay in the development of a computerized system and failure to use funds allocated for that purpose effectively and efficiently.** The court monitor limits this response to the concerns regarding unwarranted delay. The court monitor concurs that the delays in implementation of an electronic database to track filings and timelines are deleterious to accurate record keeping. The court monitor receives regular updates from OAL on the status of the electronic database being developed to track NJDOE due process hearings. OAL reports that weekly meetings occur with the vendor to bring this critical project to fruition. A go-live date is anticipated in September 2025. OAL staff will receive training on use of the system prior to that date.
- **Unwarranted delay in implementation of state law requiring establishment of a special education unit and related funding concerns.** This concern is beyond the scope of the court monitor's responsibilities as set forth in the consent decree.

Although other concerns are noted in the report, those concerns are not identified as barriers to compliance and will be generally addressed.

Reset cases: Regarding the reset cases, class counsel correctly points out that reset occurred in April, and sporadic use of the adjournment form commenced in July. Since none of those cases were properly extended after reset, all are considered to be out of compliance.

Adjournment form: OAL reports that ALJs have received extensive training on use of the adjournment form. Compliant use of the form has increased but remains problematic. Minimizing the amount of information required on the form while still maintaining compliance with 34 C.F.R. § 300.515(c) may be helpful. More dialogue is needed in this area.

Request for random audit: The compliance monitor takes this request under advisement to review and consider a process for soliciting potential interviewees and conducting the interviews.

The Compliance Monitor commends both NJDOE and OAL on the growth demonstrated during this reporting period to improve timeliness with the 45-day requirement.

Respectfully submitted this 2nd day of July 2025.



Lenore Knudtson
Compliance Monitor