



Office *of the* Auditor General

Audit of Student Placement Policies and Procedures

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PREPARED BY:

Office of the Auditor General



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ACKNOWLEDGMENTS

The auditors extend special thanks to the departments, divisions, management and school staff for their assistance throughout the audit.



Acronyms and Definitions

CSTAG	Comprehensive School Threat Assessment Guidelines
FY	Fiscal Year
LCPS	Loudoun County Public Schools
LCSB	Loudoun County School Board
LCSO	Loudoun County Sheriff's Office
LPD	Leesburg Police Department
MOU	Memorandum of Understanding
OAG	Office of the Auditor General
OSA	Office of School Administration
PUD	Principal Update
SBAR	Student Behavior and Administrative Response
SGJ	Special Grand Jury
SOC	Security Operations Center
SRO	School Resource Officer
SSA	Student Support Advisors
SY	School Year
TAEP	The Alternative Education Program
Threat Assessment	Behavioral Threat Assessment & Management
Title IX	Title IX of the Education Amendments of 1972
VDL	Virtual Distance Learning



Executive Summary

Introduction

This report describes the findings of the Office of the Auditor General's (OAG) Audit of Student Placement Policies and Procedures at Loudoun County Public Schools (LCPS). The purpose of this audit is to follow up on the Special Grand Jury's (SGJ) report and assess the effectiveness and implementation of the LCPS student placement and transfer policy.

During the audit fieldwork, the OAG sampled eight students' cases who were reassigned by the Office of School Administration (OSA) to a different school or program during the 2023-2024 school year. The OAG also interviewed three principals from both the sending and receiving schools involved in student disciplinary transfers to understand their roles in the transfer process and the communication they had with various divisions.

Summary of Findings

Two of the eight samples involved school transfers due to disciplinary actions.

In the first instance, the OAG obtained details from the principals of both the sending and receiving schools about the transfer and confirmed that they had discussed the student. However, neither school could provide documentation to evidence that a transition meeting between the schools took place or that the necessary individuals were present. Additionally, the OSA lacked supporting evidence to confirm the occurrence of the transition meeting.

In the second instance, the OAG obtained a student transition meeting document from the principal of the receiving school, which served as evidence that the meeting took place. The document included the meeting's purpose, a list of attendees, a summary of the incident, a student support and safety action plan, an action checklist for the school-based team, and a list of applicable resources. However, the counselors from both the sending and receiving schools were absent, contrary to the requirements of Policy 8155 E.3.b.



Opinion/Conclusion

Our audit opinion that **Controls Should Be Enhanced** is based on the scope and observations contained in this report.

There is a **critical risk** finding included in this report. The audit opinion cited above applies only to the scope of this audit engagement.

Summary Recommendations

Controls over student disciplinary transfers should be enhanced through the following recommendations:

- The OSA should provide training to administrators and principals at the primary level and student support advisors at the secondary level to clarify that they are the primary points of contact for initiating, coordinating, facilitating, and documenting student transition meetings. The OSA should ensure that these staff members are familiar with all aspects of the transition process, including confirming the attendance of required staff and maintaining records related to the meetings.
- The OSA should require administrators, principals, and student support advisors to forward all transition meeting documents to OSA upon completion. These documents should be maintained by OSA as evidence of compliance with Policy 8155 E.3.b.

Background

Nine members of the Special Grand Jury of Loudoun County, operating in the Loudoun County Circuit Court, impaneled at the request of the Office of the Attorney General pursuant to VA Code § 19.2-206(A)(iii) convened to investigate and report on any condition within LCPS that involves or tends to promote criminal activity and submit a report to the public to document their findings.

On December 5, 2022, the Report of the Special Grand Jury on the Investigation of Loudoun County Public Schools CL-22-3129 was ordered to be unsealed and circulated in the public domain. The SGJ report provided eight recommendations following its investigation. Recommendation two of the SGJ report is the subject of the Audit of LCPS Student Placement Policies and Procedures.

SGJ Report Recommendation 2:

“LCPS should take steps to re-examine its transfer process. A formalized protocol needs to be established requiring more vigorous cooperation and communication between, not only the two principals involved, but also, LCPS administration, assistant principals, faculty, School Resource



Officers (SRO), and when relevant, the commonwealth’s attorney’s office, juvenile court authorities and the Loudoun County Sheriff’s Office (LCSO).”

SGJ Report Rationale and Discussion:

“As our investigation revealed, the Stone Bridge High School assailant’s transfer to Broad Run High School occurred in a last minute, haphazard manner. As late as August 25, 2021, the eve of the new school year, and much to the consternation of the court services unit, LCPS administrators had not resolved the transfer issue. This led the student’s probation officer to inform the student’s mother “If we hear nothing, I am afraid [your student] has no plan for tomorrow and will need to remain home.” Once the transfer to BRHS was completed, however, critical information about the transfer student’s circumstances was withheld from the assistant principal and necessary faculty. Throughout our investigation it was evident that a misguided and way-too-expansive definition of student confidentiality hampered the communication, cooperation, and coordination necessary to provide a safe and secure environment for students, faculty, and staff.”

Memorandum of Understanding

On July 13, 2023, the LCPS Board of Education approved the Memorandum of Understanding (MOU) between the Loudoun County School Board (LCSB), the LCSO, and the Leesburg Police Department (LPD) to facilitate effective and timely communication and coordination of efforts for all parties—the School Division and LCSO/LPD. The purpose of the MOU is to establish a mutually beneficial framework within which the School Division and law enforcement agencies can work together to achieve shared goals. The MOU clarifies the role of the SRO, school administration and teachers, as well as the scope of their authority. It further defines the responsibilities of LCPS, LCSO, and LPD in this collaboration. The partnership provides LCPS with immediate and accessible contact with a specific resource officer to encourage lawful information sharing and referral between agencies. A critical goal of the partnership is to ensure a safe and positive learning environment and to promote relationships and communication between the school principal or designee and the SRO at the school(s) and in the community.

Office of School Administration

The OSA supports safe schools and positive learning environments by determining student disciplinary outcomes on behalf of the Superintendent, resolving petitions for review of short-term suspensions, and fostering the student support advisor program. The OSA actively collaborates with other LCPS offices and departments to provide resources and staff development for LCPS administrators and other stakeholders. There are instances in which the OSA utilizes documentation from other divisions, such as Title IX and the Office of Diagnostic and Prevention Services, to determine placement and make decisions regarding discipline.



In January of 2024, the OSA underwent a leadership transition with the appointment of a new Director of School Administration.

Title IX

Title IX of the Education Amendments of 1972 (Title IX) prohibits discrimination based on sex in education programs and activities that receive federal financial assistance. Title IX states “No person in the United States shall, on the basis of sex, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any education program or activity receiving Federal financial assistance.”

The Title IX Coordinator is responsible for ensuring that once any school or division employee has actual notice of sex discrimination, sexual harassment, or sexual misconduct, as defined by the Title IX Regulations, the division takes immediate and appropriate action. This includes investigating the incident, addressing and stopping the discrimination or harassment, preventing its recurrence, and remedying its effects. The Title IX Coordinator is also responsible for ensuring compliance with training requirements, establishing a prompt and equitable grievance process, developing a list of supportive measures, offering appropriate support to the complainant, and overseeing the implementation of remedies and disciplinary sanctions.

The process for reviewing and investigating a Title IX complaint is structured and involves multiple parties. Upon receiving an allegation of sexual harassment that includes claims of assault or threats of violence, the Title IX Coordinator will conduct an initial risk analysis to determine whether an individualized safety and risk assessment is necessary for emergency removal. To evaluate an individual’s potential risk for actionable violence before deciding on emergency removal, the Title IX Coordinator may refer the case to the Behavioral Threat Assessment Team, managed by the Office of Diagnostic and Prevention Services, for a violence risk assessment to gauge the potential threat the individual may pose to others.

The Office of Diagnostic and Prevention Services

The Office of Diagnostic and Prevention Services is responsible for the leadership, management and provision of services and support to schools and students in the areas of educational diagnostic services; eligibility for special education; Section 504 identification, evaluation, and placement; early childhood identification services at the Preschool Child Find Center; behavioral threat assessments; and the Multi-Tiered System of Supports, which includes Positive Behavioral Interventions and Supports, Response to Intervention, and Social-Emotional Learning. The Office of Diagnostic and Prevention Services oversees the Comprehensive School Threat Assessment Guidelines (CSTAG): Behavioral Threat Assessment training hosted by Navigate360¹. LCPS utilizes Navigate360 Behavioral Threat Assessment and Suicide Case Management System to document threat assessments.

¹ **Navigate360** combines technology, research, process improvement and predictive analytics to enable proactive, data driven conversations with students.



Behavioral Threat Assessment

Behavioral Threat Assessment and Management, sometimes shortened to just "Threat Assessment," is a behavioral approach to violence prevention that focuses on identifying targeted threats before they escalate into violent behavior. Threat assessment teams use a problem-solving approach to evaluate the risk of violence posed by individuals and to intervene and resolve the underlying issues associated with threatening behavior.

The Threat Assessment Team works to determine if the threat is easily and readily resolved, also known as a "*transient*" threat. Examples of transient threats include jokes, figures of speech, temporary feelings of anger at the time of the threat, or rhetorical remarks that do not represent genuine or continued intent to harm someone.

Any threat that cannot be clearly resolved as transient or indicates a continuing intent to harm someone beyond the immediate incident is treated as a '*substantive*' threat. Substantive threats always require protective action and intervention to prevent the threat from being carried out. When the school threat assessment team determines that a student has made a '*very serious substantive*' threat, the team must obtain a temporary detention order evaluation with Loudoun County Emergency Services, followed by a mental health evaluation. The team will consider recommendations from the mental health evaluation to reduce the risk of violence and to address the problem or conflict related to the threat.

Below are the classifications of all threat assessments completed during the 2023-2024 school year:

Threat Classification	Number of Assessments
Not A Threat	366
Transient	1,582
Substantive	170
Very Serious Substantive	38
Total for 2023-2024 School Year	2,156



The Division of Safety and Security

The Division of Safety and Security provides threat assessment support and guidance to the Office of Diagnostic Services, supports all departments within LCPS and works collaboratively with all schools to enhance security initiatives. The division utilizes a 24/7 Security Operations Center (SOC) to manage investigations and deploy security assets throughout LCPS. It coordinates all document requests, including legal subpoenas, video records requests, and the 24/7 investigative response to in-school incidents, student welfare checks, intrusion detection alarms, as well as tips and investigative leads from Safe2Talk² and Gaggle. Additionally, the Division of Safety and Security provides all emergency management and security tactics training for LCPS, ensuring best practices and state compliance with response procedures.

Objective, Scope and Methodology

The objective of this audit was to follow up on the SGJ's report and assess the effectiveness and implementation of the LCPS student placement and transfer policy. The audit covered activities from the 2023-2024 school year through April 2024.

Our procedures included, but were not limited to, the following:

- Review relevant policies, procedures, regulations and other pertinent documents,
- Interview key personnel responsible for overseeing the student disciplinary transfer process,
- Interview school-based administrators who are involved in the student disciplinary process, as well as representatives from other divisions that provide information for OSA decision-making,
- On a sample basis, review student transfer files and confirm that the disciplinary process adheres to LCPS policies and regulations and
- Confirm LCPS adherence to the MOU.

Audit Criteria

MOU between LCSB, LCSO, and LPD

Policy 8035 Title IX, Sex-Based Discrimination, Sexual Harassment

Policy 8035 Title IX, Sex-Based Discrimination, Sexual Harassment - REGULATION

Policy 8155 School Assignment

Policy 8220 Student Suspension from School

Policy 8220.1 Procedures for Short-Term and Long-Term Suspension - REGULATION

Policy 8230 Appeals & Hearings - Student Discipline

Policy 8290 Threat Assessment for the Protection of Schools

Policy 8290 Threat Assessment for the Protection of Schools – REGULATION

² Safe2Talk is a free, downloadable app that allows students, parents, teachers, and community members the ability to anonymously report safety concerns in our schools, including suspicious or threatening social media activity.



Findings and Recommendations

Each finding is classified based on organizational level risk as Critical (C), Moderate (M), or Low (L) ³.

C

1. In one instance, the school administration failed to maintain documentation of the transition meeting for a disciplinary transfer as evidence of adherence to Policy 8155 E.3.b⁴. In another case, while the transition meeting was held, not all required staff attended.

In the transition meeting, teams from both the sending and receiving schools formally review relevant student history, threat assessment findings, and other concerns to develop necessary safety and support measures for the student's transition. At elementary schools, the principal and administrators manage the transition meeting, while at middle and high schools, the student support advisor oversees the process.

Out of eight samples, two involved transfers between schools due to disciplinary actions.

In the first instance, although the sending school's principal confirmed a discussion with the receiving school's principal, the OAG could not verify it or obtain details from the receiving school. There was no documentation from either school or the OSA to confirm the transition meeting or attendance.

In the second instance, the OAG received documentation from the receiving school's principal detailing the transition meeting. However, according to Policy 8155 E.3.b, the required counselors from both schools were absent.

Recommendation 1: OSA should provide training to administrators, principals and student support advisors to coordinate, facilitate and document student transition meetings, ensuring they know how to confirm attendance and keep records.

Why It Matters: Effective training for administrators, principals and student support advisors is crucial because it ensures that student transition meetings are managed, documented, and staffed effectively. This training helps maintain consistency, ensures compliance with policies, and enhances the overall effectiveness of the transition process, ultimately supporting students' successful transitions between schools.

³ Critical – Is a high priority issue, immediate management attention is required. Moderate – Is a medium priority issue, timely management attention is warranted. Low – Is a low priority issue, routine management attention is warranted.

⁴ Since the completion of the audit, LCPS has updated Policy 8155. As of December 10, 2024, the referenced section E.3.b of Policy 8155 has been renumbered to F.3.b.



One LCPS Strategic Plan: Goal 1.3 – Care for students. *Ensure a safe and affirming learning environment for all students by implementing a system of supports to address their academic, behavioral, and social-emotional needs.*

Goal 2.1 – Ongoing Growth and Development. *Offer high-quality professional learning, coaching, mentorship, and leadership development; including emphasis on core academic excellence, special education and English language learners.*

Management Response: *Student Support Advisors (SSAs) facilitate all transition meetings for middle and high school students. High school SSAs were trained on this process on August 15, 2024, as were administrators from The Alternative Education Program (TAEP) and Virtual Distance Learning (VDL), the two alternative programs to which secondary students may be reassigned via the discipline process.*

Transition meetings for middle school students are less frequent. Middle School SSAs were trained on this process on November 19, 2024. Further, due to the infrequency of middle school transitions, when a middle school student requires such meeting, the OSA Supervisor reaches out to the SSA to provide just-in-time training on the transition process.

Transition meetings for elementary school students occur even less frequently. As such, when an elementary school student requires a transition meeting, the OSA Supervisor reaches out to the elementary school administrator to provide just-in-time training on the transition process.

The Chief of Schools and OSA recognize that Subsection E.3.b of Policy 8155 is unworkable as currently written. Firstly, the policy requires the attendance at student transition meetings of parties who cannot be invited without a release/exchange of information that has been voluntarily signed by the student’s parent; such parties include local law enforcement, court services, private providers, and the Office of the Commonwealth’s Attorney. Secondly, mandating the attendance of all required parties is impractical and would result in a significant delay in the convening of any such meeting and/or a delay in transitioning the student to the assigned setting. As such, the Chief of Schools and OSA recommend that Subsection E.3.b of Policy 8155 be reviewed to determine whether mandating the attendance of all named parties is reasonable and any revisions should be made.

Responsible Process Owner: OSA

Target Date: December 1, 2024

Assessment of the Management Response by the Office of the Auditor General: The Auditor General has reviewed the management response and determined it adequately addresses this audit recommendation.



Recommendation 2: The OSA should require administrators, principals and student support advisors to send all transition meeting documents to the OSA for records retention.

Why It Matters: The OSA has oversight responsibility for the transition meeting. Archiving and maintaining direct access to these records ensures that all transition meeting documents are consistently collected and stored in a central system, improving record-keeping, compliance, and accessibility for future reference.

One LCPS Strategic Plan: Goal 2.2 – Professional Collaboration. *Develop dedicated resources to connect and align staff across the division to ensure schools offer equitable opportunities for all students.*

Goal 3.2 – Straightforward Communication. *Standardize and coordinate division-wide communication practices, to improve data sharing and decision-making to strengthen relationships and trust at all levels of division leadership.*

Management Response: *Beginning with the 2024-25 school year, the expectation that transition meeting documentation be submitted to OSA is clearly marked on the transition meeting form. All transition meeting documents are uploaded to OSA and placed in student files by the OSA Supervisor. The OSA Supervisor monitors each case that requires a transition meeting to ensure documentation is submitted.*

Responsible Process Owner: OSA

Target Date: School Year 24-25

Assessment of the Management Response by the Office of the Auditor General: The Auditor General has reviewed the management response and determined it adequately addresses this audit recommendation.

Recommendation 3: The Office of Diagnostic and Prevention Services should provide the OSA with access to the Navigate360 System to review all LCPS threat assessments conducted. Additionally, each threat assessment should be included in the student’s OSA file.

Why It Matters: The OSA must have access to all relevant student documentation, particularly regarding safety, to ensure a holistic and comprehensive view of the student.

One LCPS Strategic Plan: Goal 3.2 – Straightforward Communication. *Standardize and coordinate division-wide communication practices, to improve data sharing and decision-making to strengthen relationships and trust at all levels of division leadership.*



Management Response:

The Office of Diagnostic and Prevention Services:

The Office of School Administration administrative staff have been provided access to LCPS' behavioral threat assessment case management system. The Director of School Administration is a member of LCPS' Level 2 division threat assessment team whose collective role is to provide oversight, support, and guidance to school threat assessment teams as needed and when required. The purpose of the division team is to ensure that procedures are maintained for effective information sharing between the school division and community mental health and law enforcement agencies; assess the effectiveness of the threat assessment process throughout the school division; and recommend changes to policies and procedures, as needed, to ensure an effective threat assessment process that reflects known best practices.

OSA:

Beginning with SY24-25, threat assessment documentation, if applicable, must be submitted by school administrators with all referrals to OSA, as noted on the checklist of required components.

Responsible Process Owners: The Office of Diagnostic and Prevention Services, OSA

Target Date: School Year 24-25

Assessment of the Management Response by the Office of the Auditor General: The Auditor General has reviewed the management response and has determined it adequately addresses this audit recommendation.

Recommendation 4: The Title IX office should include details about the emergency removal process on its webpage.

Why It Matters: LCPS values transparency and communication from the Division to all relevant stakeholders.

One LCPS Strategic Plan: Goal 4.3 – Trust-building Dialogue and Data. *Expand opportunities to involve community stakeholders in making key decisions for LCPS; improve access to information via enhanced transparency in budget and policy as well as increased investment in language services.*

Management Response: *The Title IX Office will develop Title IX Emergency Removal Guidance and post it to its website.*



Responsible Process Owner: Title IX Office

Target Date: *The Title IX Office will update its website with the emergency removal process by January 2025.*

Assessment of the Management Response by the Office of the Auditor General: The Auditor General has reviewed the management response and has determined it adequately addresses this audit recommendation.

M

2. The OAG noted three instances where not all behaviors and violations were reported in the student discipline profile in Phoenix⁵. Additionally, OAG found one instance in which the student's threat assessment was not included in the OSA file.

In one instance, a threat assessment was conducted for an incident that resulted in a long-term suspension; however, a copy of the threat assessment was not included in the student's OSA disciplinary file.

The OSA requires principals to submit the referral packet to the OSA, which contains documents detailing the student's educational history and supporting the decision to administer discipline. This packet, along with formal OSA correspondence and other relevant documents, creates the student file. The threat assessment performed will help the OSA and others understand the risk of violence posed by the student.

The Student Discipline Profile within the Phoenix Student Information System is used to enter incident information, including incident date, location, specific Student Behavior and Administrative Response (SBAR) violations, disposition date and description.

During our review of student disciplinary files, the OAG found behaviors and incidents detailed in OSA formal communication and parent/student meeting notes that school-based staff did not record in the Student Discipline Profile. Incomplete student data impacts management decision-making.

Recommendation 5: Principals and school administrators should ensure consistency in reporting student behaviors and violations through the student discipline profile in Phoenix and provide training to relevant staff as needed.

⁵ **Phoenix** is an all-in-one school solution for K-12 schools that includes School Management System, Learning Management System, health and safety, academics, administration, and operations. It also provides quick reporting of school incidents and actionable data.



Why It Matters: It is paramount for schools to consistently track violations of the student code of conduct. A complete student discipline profile enables OSA to gain a comprehensive view of each student, which is essential for making informed disciplinary decisions.

One LCPS Strategic Plan: Goal 3.2 – Straightforward Communication. *Standardize and coordinate division-wide communication practices, to improve data sharing and decision-making to strengthen relationships and trust at all levels of division leadership.*

Management Response: *All school-based administrators attended training in August 2024, during which this expectation was reviewed. Further, the PUD (Principal Update) publishes a monthly reminder to school-based administrators to ensure discipline incidents and responses are entered into Phoenix and all identified errors are resolved. Level directors follow up with principals on a quarterly basis regarding any outstanding errors. OSA staff monitors the accurate recording in Phoenix of any incident that resulted in a referral or recommendation to OSA.*

Responsible Process Owner: Chief of Schools

Target Date: August 2024

Assessment of the Management Response by the Office of the Auditor General: The Auditor General has reviewed the management response and determined it adequately addresses this audit recommendation.

Recommendation 6: Principals should include current and all former threat assessments with the referral packet to the OSA when providing records for disciplinary action. The threat assessment team should review all former threat assessments. The OSA should also review current and former threat assessments when determining disciplinary sanctions.

Threat assessment teams are required to analyze current and former records to understand the subject's situation and determine whether there have been patterns of violence or threats in the past. Additionally, an optional form is available for documenting observations that suggest a need for intervention and for inquiring about the student's history of physical violence, criminal acts, intense anger, or resentment.

Principals should review a student's cumulative file and contact the Office of Diagnostic and Prevention Services to query archival records as needed to obtain former threat assessments.

Why It Matters: Threat assessment procedures are used to assess and intervene with individuals whose behavior poses a threat to the safety of school staff or students. These procedures are incomplete when past data is omitted. The OSA must have access to all relevant



student documentation, particularly regarding safety, to ensure a holistic and comprehensive view of the student for decision-making.

One LCPS Strategic Plan: Goal 3.2 – Straightforward Communication. *Standardize and coordinate division-wide communication practices, to improve data sharing and decision-making to strengthen relationships and trust at all levels of division leadership.*

Management Response:

The Office Diagnostic and Prevention Services:

The threat assessment team should review all former threat assessments. This is explicitly reviewed in CSTAG Level 2 training regarding gathering and assessment of "Assessment Findings" information. In addition, OSA, provides a checklist to school teams and the checklist indicates that threat assessments are to be provided within the disciplinary packet.

The optional form for documenting observations that suggest the need for intervention has been incorporated into the CSTAG Level 2 training.

We plan to post a statement in the Schoology group dedicated to Threat Assessment Teams to alert teams to contact us if they are in search of archival records.

OSA:

Beginning with SY24-25, threat assessment documentation, if applicable, must be submitted by school administrators with all referrals to OSA, as noted on the checklist of required components.

Responsible Process Owners: The Office of Diagnostic and Prevention Services, OSA

Target Date: School Year 24-25

Assessment of the Management Response by the Office of the Auditor General: The Auditor General has reviewed the management response and determined it adequately addresses this audit recommendation.

Recommendation 7: The referral packet should be revised to include a section where schools can record the date and time student discipline incidents were reported to the SRO, along with the name of the SRO notified.

Why It Matters: Adding a section to record the SRO's name, along with the date and time the incident was reported to law enforcement, creates a clear, traceable record of communication



between the school and law enforcement. This enhances transparency, provides timelines, and can be vital for future investigations or follow-up actions.

One LCPS Strategic Plan: Goal 3.2 – Straightforward Communication. *Standardize and coordinate division-wide communication practices, to improve data sharing and decision-making to strengthen relationships and trust at all levels of division leadership.*

Management Response: *The aforementioned fields must be recorded by school administrators, if applicable, at the time discipline referrals are uploaded to OSA.*

Responsible Process Owner: OSA

Target Date: January 15, 2025

Assessment of the Management Response by the Office of the Auditor General: The Auditor General has reviewed OSA's updated online referral packet process and determined that it adequately addresses this audit recommendation.

