



Reimagining Approaches to Dismantling Disproportionality in Special Education and Beyond

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Not everything that is faced can be changed, but nothing can be changed until it is faced.
(Baldwin, 1962)

Introduction

Despite long-standing efforts to address and eliminate disproportionality in special education, inequities remain and continue to negatively impact Black, Indigenous, and other students of color with Individualized Education Programs (IEPs) (Skiba et al., 2016). This brief is intended to support state education agencies, local education agencies, offices of special education, providers of technical assistance and professional development or professional learning, and other education leaders to rethink and reimagine how to address disproportionality in special education by addressing inequities in the entire system.

The Individuals with Disabilities Education Act (IDEA) can trace its roots to the victories of the Civil Rights Movement of the 1950s and 1960s, leveraging similar legal strategies and the collective mobilization against social injustice—particularly against white supremacy (Spaulding & Pratt, 2015; Voulgarides, 2018). Although IDEA's status as a civil rights law is firmly established, its social justice intent is limited when efforts to address disproportionality revolve around approaches that are intended to be race-neutral and that focus more on providing evidence of procedural compliance with IDEA than on addressing the beliefs, policies, and practices driving and sustaining disproportionality (Hernández et al., 2022; Voulgarides, 2018; Voulgarides et al., 2021).

Before delving into how to disrupt disproportionality, first consider what disproportionality is. Although IDEA does not explicitly define it (U.S. Department of Education, 2022), the term “disproportionality” refers to the overrepresentation or underrepresentation of a specific group of students in an educational context, including in terms of identification for special education services, for placement in an educational environment (i.e.,



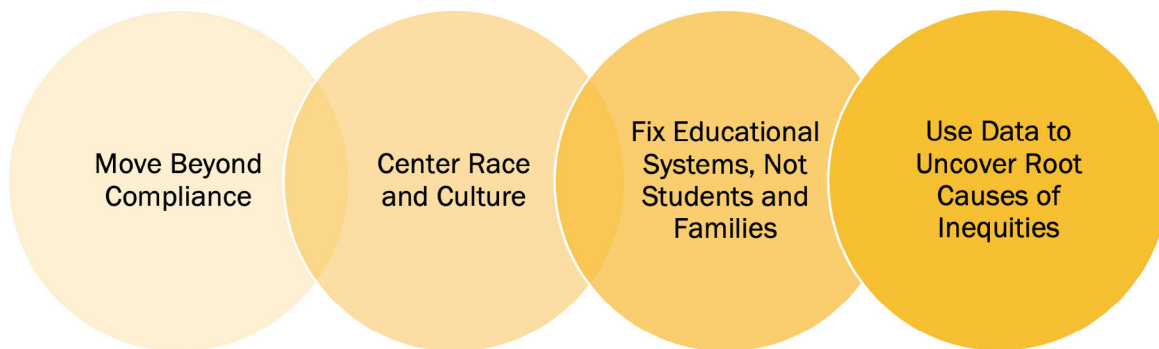
where a student receives special education services), or for disciplinary action. IDEA requires “states to use a standard methodology for analysis of disproportionality, which includes states setting a threshold above which disproportionality in the identification, placement, or discipline of children with disabilities within an LEA is significant” (U.S. Department of Education, Office of Special Education Programs, n.d.).¹ The standard methodology supports states and districts in understanding the numeric impact of disproportionality and not necessarily in understanding specific causes.

This brief aims to help state, district, and school leaders consider the following key approaches when working to address disproportionality:

- move beyond compliance
- center race and culture
- fix educational systems, not students and families
- use data to uncover root causes of inequities

These ideas are overlapping—they connect to and build upon each other (Figure 1). Taken together, they are intended to transform efforts to dismantle disproportionality by building upon the history of social movements for justice and upon the mandates set forth by IDEA.

Figure 1. Key Approaches for Addressing Disproportionality



1 For more information on state and district determination, see <https://ncsi-library.wested.org/resources/645>.



Move Beyond Compliance

Disproportionality is the outcome of institutionalized racism and bias that result in discriminatory beliefs, policies, and practices which negatively affect historically marginalized groups in contrast to privileged groups. (Hernández et al., 2022, p. 3)

The understanding of disproportionality indicated in the quote above was developed by students who participated in the Youth Technical Assistance Center for Disproportionality (YTAC-D),² a youth participatory action research project aimed at addressing disproportionality in their educational community.

YTAC-D's understanding allows educators to couple the numeric approach to identifying disproportionality with a focus on how and why disproportionality occurs in educational systems. The youth understanding asks education leaders to move beyond compliance and to address systems of oppression that are based on the beliefs, policies, and practices that negatively impact marginalized students.

Given the historical legacy of the exclusion of students with disabilities from appropriate education, compliance with IDEA is of utmost importance. However, research indicates that procedural compliance with IDEA's requirements following a citation for disproportionality has often been ineffective at addressing inequities (Voulgarides, 2018). Such procedural compliance includes conducting mandated reviews, implementing systemwide interventions such as a multi-tiered system of supports (MTSS), and providing technical assistance support through the state education agency. In fact, many interventions to address disproportionality through IDEA compliance fail to address the systemic, historical, and current dynamics associated with race and disability in the United States that drive disproportionality (Voulgarides, 2018; Voulgarides et al., 2017, 2021). These interventions often aim to fix the students and not the system or adult practices, as the interventions do not uncover and address the beliefs, policies, and practices that create and sustain disproportionality (Hernández et al., 2022).

For example, a Behavior Intervention Plan aims to alter a student's behaviors rather than focusing on the adult practices that may contribute to the behaviors. Additionally, behavioral interventions ignore the impacts of bias and stereotypes and of unwelcoming or hostile school environments. These school environments may include curricula and instruction that are not relevant to students' identities, cultures, or experiences, and the school may lack genuine partnerships with students and families (Calais & Green, 2022). Efforts to address disproportionality should not be limited solely to special education but should work to address district and schoolwide beliefs, policies, and practices that impact outcomes for students with disabilities (Hernández et al., 2022).

² For more information on YTAC-D, see <https://steinhardt.nyu.edu/metrocenter/iesc/interrogating-interrupting-and-eradicating-disproportionality-through-youth-voice>.



Broader efforts to address disproportionality should use schoolwide and districtwide data (including special education data) to inform interventions and should ensure that technical assistance, professional development, coaching, and other school/district improvement efforts are not focused exclusively on special education offices, personnel, and systems. For example, districts cited for the over-suspension of Indigenous students with an IEP will often see similar trends for Indigenous students without an IEP. Focusing attention only on the special education system reduces the problem to a special education concern, ignoring the schoolwide and districtwide factors that impact both students with IEPs and those without. Disproportionality in special education is often the outcome of larger systemic inequities (Hernández et al., 2022).

Steps That Systems Leaders Can Take to Move Beyond Compliance

- Form a district/school equity team that is representative of your educational community and conduct a comprehensive root cause analysis to identify beliefs, policies, and practices contributing to disproportionality in a variety of outcomes, including enrollment in advanced placement (AP) courses or in honors or gifted programs, placement in special education, rates of attendance or behavior incidents, and other outcomes (Fergus, 2017; Hernández et al., 2022).
- Implement student support systems (e.g., MTSS, social and emotional learning, restorative justice, response to intervention [RTI]) in ways that consider both the technical components of implementation and the adaptive components (history, culture, social context, and identity) (Levenson et al., 2021; Milner, 2020).
- Use data that include both students with IEPs and those without in order to consider the ways broader school practices, systems, and beliefs are impacting both students with disabilities and those without (Fergus, 2017).
- Include experiential data (e.g., from surveys, listening sessions, focus groups, empathy interviews) to help identify inequities and their root causes and to center the voices of those most impacted by systemic racism, ableism, and other sources of inequities within education (Knips et al., 2022; Safir & Dugan, 2021).

Center Race and Culture

Centering race means acknowledging and addressing systemic racism, which includes (but is not limited to) “an array of antiblack practices, the unjustly gained political-economic power of whites, the continuing economic and other resource inequalities along racial lines, and the white racist ideologies and attitudes created to maintain and rationalize white privilege and power” (Safir & Dugan, 2021, p. 13). Stark differences emerge upon examination of the educational experiences of students by race and ethnicity, which cannot be disconnected from the racist past of the United States (Carter et al., 2017). For example, discipline disparities between Black students and White students have a historic nature, as they have been evident for some time. More specifically, Black students are more likely than their White peers to receive out-of-school suspensions, even when controlling



for poverty, the seriousness of their infractions, and the frequency of being involved in disciplinary incidents (Carter et al., 2017; Skiba et al., 2016). Efforts to monitor and understand discipline practices must therefore center race and culture and address disproportionality (Hernández et al., 2022).

Centering race and culture when implementing evidence-based practices and research-based frameworks is important when considering the outcomes for all students. Efforts to reduce disparities in behavior by implementing programs and policies such as restorative justice or Positive Behavioral Interventions and Supports (PBIS) without explicitly making considerations of race and culture central to implementation have tended not to succeed in eliminating racial disparities (Gregory & Clawson, 2016; McIntosh et al., 2021). Similarly, efforts to address disproportionate representation of students who have been minoritized in special education without attending to race and culture have led to deficit-based approaches, failing to eliminate disproportionality (Sabnis et al., 2020).

Steps That Educators Can Take to Center Race and Culture

- Implement culturally responsive and sustaining education by embedding the approaches, values, and practices throughout all educational environments, curricula, instruction, relationships, and family engagement efforts (Hernández et al., 2022; New York State Department of Education, n.d.).
- Develop explicitly race-conscious interventions and programs (Carter et al., 2017; Howard, 2010), including RTI (Klingner & Edwards, 2006), MTSS (Gregory & Clawson, 2016), and PBIS (Bal, 2018; McIntosh et al., 2021), which aim to fix systems and improve adult practices rather than remediate students.
- Acknowledge and address the historical and predominant narratives around “appropriate” behavior and cultural knowledge deemed valid and useful to educators and educational processes and consider the ways cultural conflict (Milner, 2020) and cultural erasure contribute to disproportionality (Fergus, 2017; Gregory et al., 2017; Khalifa, 2018).
- Talk openly and explicitly about race, racism, and the causes of and solutions to racial disparities at all levels that focus on changing adult practices and systems (Carter et al., 2017; Fergus, 2017; Howard, 2010; Khalifa et al., 2016; Pollock & Pollock, 2008).
- Learn about, identify, and address bias, stereotypes, and prejudice as they appear throughout curricula, instruction, interactions, and school environments (Carter et al., 2017; Gregory et al., 2017; Quereshi & Okonofua, 2017).
- Use disaggregated data to identify and monitor inequities (Carter et al., 2017; Fergus, 2017; Gregory et al., 2017; Hernández et al., 2022).
- Prioritize [Culturally Responsive Data Literacy](#), which includes using multiple forms of data (quantitative data, empathy interviews, climate data, etc.) with an asset-based lens to inform root cause analysis and implementation of changes to instruction, assessment, family and student leadership, and other environmental factors (National Center for Systemic Improvement, 2019; Safir & Dugan, 2021).



Fix Educational Systems, Not Students and Families

Trying to address disproportionality through interventions aimed at improving student behavior and/or academic skills without addressing systemic factors essentially places the blame for disproportionality on students and families and their home cultures. This type of deficit orientation views home environment, family/community language, student culture, and genetics as being deficient or pathological (Howard, 2010, p. 69). State and local educators should become adept at recognizing what is commonly referred to as “deficit thinking” and the role it plays in creating and maintaining disproportionality (Fergus, 2017; Gorski, 2019; Milner, 2020). Table 1 summarizes approaches used by “deficit theorists” for addressing educational inequalities versus those used by “difference theorists.” Deficit approaches blame students and their families for disproportionality, assuming that a student’s genetics or home/community environment means there is little a school can do to improve the student’s outcomes and experiences. By contrast, focusing on cultural differences entails addressing disproportionality by transforming schools, specifically by incorporating the cultural, linguistic, and familial assets of students into schools’ structures, policies, and practices (Howard, 2010).

Table 1. Cultural Deficit Theory Versus Cultural Difference Theory

Cultural deficit theory	Cultural difference theory
Culture is nonexistent or abnormal.	Culture is rich, unique, and complex.
Language is a deficit.	Language is an asset.
Home environment is pathological.	Home environment has capital.
Genetics matters.	Environment matters.
Solution: Transform the Child	Solution: Transform the School

Note. Howard, 2010, p. 69

Steps That Educators Can Take to Fix Educational Systems, Not Students and Families

Educators at all levels should embrace improvement efforts that view student, family, and community culture and language as assets; recognize various forms of capital that students and families bring; and understand the role that educational environments play in student outcomes (New York State Department of Education, n.d.). These approaches may include the following (Gregory et al., 2017):

- ensuring supportive relationships
- creating bias-aware and respectful school environments



- ensuring culturally responsive curricula, instructional practices, and assessments
- creating opportunities for learning socially relevant behavioral expectations (Bal et al., 2012)
- utilizing data for equity
- leveraging problem-solving approaches to discipline
- centering the goals, perspectives, and voices of students and families

Use Data to Uncover Root Causes of Inequities

You could bring in an adult to do a 2-day evaluation of a school and come up with some conclusion. But if you [consult] a student who actually attends the school, that student deals with the school every day, so he or she is an expert at knowing what their peers need.

– Dimitri, grade 12 (Mirra et al., 2016, p. 13)

It's important to do research [on your own] so it's not only other people who are telling our story. We are the ones living through this current education crisis.

– Evelyn, grade 12 (Mirra et al., 2016, p. 13)

As the above statements by high school students who took part in a youth participatory action research project suggest, those most impacted by the social problems plaguing schools must be intimately involved in the process of learning about those problems and identifying solutions to them (Mirra et al., 2016).

To identify and address the root causes of disproportionality—by moving beyond what is mandated by IDEA and by centering race and taking an asset-based approach—education leaders should intentionally utilize various forms of data. Quantitative data (e.g., attendance, graduation, behavioral referral rates, assessment data) should be disaggregated by race/ethnicity, gender, IEP status, and so on, to identify district and schoolwide equity trends (Fergus, 2017; Gregory et al., 2017). In addition, leaders should intentionally use an intersectional lens when collecting and analyzing data. Considering intersectionality involves looking at how a student's multiple identities (e.g., how their gender and race and ability) impact their experiences (Crenshaw, 1991).



For example, education leaders should consider the following types of questions when reviewing systems data:

- What do school suspension trends look like when analyzed by race/ethnicity, gender, and other groupings? Are there differences by race/ethnicity, gender, or other groupings?
- What patterns emerge about the placement of certain student groups in substantially separate educational environments?
- What differences are visible in graduation rates when analyzed by race/ethnicity, gender, and other groupings?

Although disaggregating data is important and necessary, it is not enough to ensure that educators will address the beliefs, policies, and practices driving disproportionality and other inequities. Research indicates that carelessly viewing inequities in data (e.g., disproportionality in school discipline) can reinforce racist stereotypes and other bias-based beliefs, such as deficit-thinking, and thereby leave the systems and practices driving disproportionality unchallenged (Bertrand & Marsh, 2021; Carter et al., 2017; Lasater et al., 2021).

Steps That Educators Can Take to Use Data to Uncover Root Causes of Inequities

- Center the perspectives and voices of students and family members who are most impacted by disproportionality (e.g., Black, Latine) by including them in data review processes and by utilizing any available qualitative data (e.g., surveys) alongside quantitative data (Garcia et al., 2018; National Center for Systemic Improvement, 2019).
- Intentionally create an atmosphere to begin and sustain conversations about race and racism, culture, and equity by taking time to introduce and use agreements and protocols for sustaining meaningful engagement (Carter et al., 2017; Singleton, 2015).
- Ensure that the implementation of any multitiered academic or behavioral system (e.g., RTI, PBIS, MTSS) includes professional learning and coaching focused on race, identity, culture, equity, bias, and culturally responsive and sustaining education (Leverson et al., 2021; McIntosh et al., 2021; Morales-James et al., n.d.).
- View equity trends with an understanding of the local and national history and context related to race, racism, identity, bias, stereotypes, power, and privilege (Carter et al., 2017; Khalifa, 2018; Milner, 2020).
- In addition to tracking special education data to monitor for disproportionality, collect and utilize data showing trends throughout the school and district (e.g., suspension data by race/ethnicity for students with an IEP and those without an IEP).

State education agencies, districts, schools, technical assistance providers, and other education partners can shape how disproportionality is understood, framed, discussed, and addressed within the systems they influence. The framing and strategies offered in this brief are designed to help leaders shift from a compliance orientation to one focused on disrupting the status quo and transforming systems by centering the voices, experiences, and humanity of the children and families most harmed by disproportionality.



References

- Bal, A. (2018). Culturally responsive positive behavioral interventions and supports: A process-oriented framework for systemic transformation. *Review of Education, Pedagogy, and Cultural Studies*, 40(2), 144–174. <https://doi.org/10.1080/10714413.2017.1417579>
- Bal, A., King Thorius, K., & Kozleski, E. (2012). *Culturally responsive positive behavioral support matters*. Equity Alliance. http://dm.education.wisc.edu/abal/intellcont/CRPBIS%20Brief_Bal%20et%20al_2012-1.pdf
- Baldwin, J. (1962, January 14). As much truth as one can bear. *The New York Times*.
- Bertrand, M., & Marsh, J. (2021). How data-driven reform can drive deficit thinking. *Phi Delta Kappan*, 102(8), 35–39. <https://doi.org/10.1177/003172172111013936>
- Calais, J., & Green, M. (2022). The racial pandemic: Positive Behavior Intervention and Support as an asymptomatic carrier of racism. *Perspectives on Early Childhood Psychology and Education*, 6(1), 107–129.
- Carter, P. L., Skiba, R., Arredondo, M. I., & Pollock, M. (2017). You can't fix what you don't look at: Acknowledging race in addressing racial discipline disparities. *Urban Education*, 52(2), 207–235. <https://doi.org/10.1177/0042085916660350>
- Crenshaw, K. (1991). Mapping the margins: Intersectionality, identity politics, and violence against women of color. *Stanford Law Review*, 43(6), 1241–1299. <https://doi.org/10.2307/1229039>
- Fergus, E. (2017). *Solving disproportionality and achieving equity: A leader's guide to using data to change hearts and Minds*. Corwin.
- Garcia, N. M., López, N., & Vélez, V. N. (2018). QuantCrit: Rectifying quantitative methods through critical race theory. *Race Ethnicity and Education*, 21(2), 149–157. <https://www.tandfonline.com/doi/full/10.1080/13613324.2017.1377675>
- Gorski, P. (2019). *Avoiding racial equity detours*. ASCD. <https://www.ascd.org/el/articles/avoiding-racial-equity-detours>
- Gregory, A., & Clawson, K. (2016). The potential of restorative approaches to discipline for narrowing racial and gender disparities. In R. J. Skiba, K. Mediratta, & M. K. Rausch (Eds.), *Inequality in school discipline: Research and practice to reduce disparities* (pp. 153–170). Palgrave Macmillan. https://doi.org/10.1057/978-1-137-51257-4_9



- Gregory, A., Skiba, R. J., & Mediratta, K. (2017). Eliminating disparities in school discipline: A framework for intervention. *Review of Research in Education*, 41(1), 253–278. <https://doi.org/10.3102/0091732x17690499>
- Hernández, M., Lopez, D., & Swier, R. (2022). *Dismantling disproportionality: A culturally responsive and sustaining approach*. Teachers College Press.
- Howard, T. C. (2010). *Why race and culture matter in schools: Closing the achievement gap in America's classrooms* (Multicultural Education Series). Teachers College Press.
- Khalifa, M. A. (2018). *Culturally responsive school leadership*. Harvard Education Press.
- Khalifa, M. A., Gooden, M. A., & Davis, J. E. (2016). Culturally responsive school leadership: A synthesis of the literature. *Review of Educational Research*, 86(4), 1272–1311. <https://doi.org/10.3102/0034654316630383>
- Klingner, J. K., & Edwards, P. A. (2006). Cultural considerations with response to intervention models. *Reading Research Quarterly*, 41(1), 108–117. <https://doi.org/10.1598/rrq.41.1.6>
- Knips, A., Savoy, M., Lopez, S., & LaParo, K. (2022). *Equity in data: A framework for what counts in schools*. ASCD.
- Lasater, K., Bengtson, E., & Albiladi, W. S. (2021). Data use for equity?: How data practices incite deficit thinking in schools. *Studies in Educational Evaluation*, 69, 100845. <https://doi.org/10.1016/j.stueduc.2020.100845>
- Levenson, M., Smith, K., McIntosh, K., Rose, J., & Pinkelman, S. (2021). *PBIS cultural responsiveness field guide: Resources for trainers and coaches*. Center on PBIS, University of Oregon. <https://www.pbis.org/resource/pbis-cultural-responsiveness-field-guide-resources-for-trainers-and-coaches>
- McIntosh, K., Girvan, E. J., McDaniel, S. C., Santiago-Rosario, M. R., St. Joseph, S., Fairbanks Falcon, S., Izzard, S., & Bastable, E. (2021). Effects of an equity-focused PBIS approach to school improvement on exclusionary discipline and school climate. *Preventing School Failure: Alternative Education for Children and Youth*, 65(4), 354–361. <https://doi.org/10.1080/1045988x.2021.1937027>
- Milner, R. H. (2020). *Start where you are, but don't stay there: Understanding diversity, opportunity gaps, and teaching in today's classrooms* (2nd ed.). Harvard Education Press.
- Mirra, N., Garcia, A., & Morrell, E. (2016). *Doing youth participatory action research: A methodological handbook for researchers, educators, and youth*. Routledge.
- Morales-James, C., Lopez, L., Wilkins, R., & Fergus, E. (n.d.). *Cultural adaptations when implementing RTI in urban settings*. RTI Action Network. <http://www.rtinetwork.org/learn/diversity/cultural-adaptations-when-implementing-rti-in-urban-settings>



National Center for Systemic Improvement. (2019). *Culturally responsive data literacy*. <https://ncsi.wested.org/wp-content/uploads/2021/03/NCSI-Culturally-Responsive-Data-Literacy.pdf>

New York State Department of Education. (n.d.). *Culturally responsive-sustaining education framework*. <http://www.nysed.gov/common/nysed/files/programs/crs/culturally-responsive-sustaining-education-framework.pdf>

Pollock, M., & Pollock, M. (2008). Talking precisely about equal opportunity. In M. Pollock (Ed.), *Everyday antiracism: Getting real about race in school* (pp. 24–27). New Press.

Quereshi, A., & Okonofua, J. (2017). *Locked out of the classroom: How implicit bias contributes to disparities in school discipline*. The NAACP Legal Defense and Educational Fund; Thurgood Marshall Institute. <https://www.naacpldf.org/our-thinking/issue-report/education/locked-classroom-implicit-bias-contributes-disparities-school-discipline/>

Sabnis, S., Castillo, J. M., & Wolgemuth, J. R. (2020). RTI, equity, and the return to the status quo: Implications for consultants. *Journal of Educational and Psychological Consultation*, 30(3), 285–313. <https://doi.org/10.1080/10474412.2019.1674152>

Safir, S., & Dugan, J. (2021). *Street data: A next-generation model for equity, pedagogy, and school transformation*. Corwin and Learning Forward.

Singleton, G. E. (2015). *Courageous conversations about race: A field guide for achieving equity in schools*. Corwin.

Skiba, R. J., Arredondo, M. I., Gray, C., & Rausch, M. K. (2016). What do we know about discipline disparities? New and emerging research. In R. J. Skiba, K. Mediratta, & M. K. Rausch (Eds.), *Inequality in school discipline: Research and practice to reduce disparities* (pp. 21–38). Palgrave Macmillan.

Spaulding, L. S., & Pratt, S. M. (2015). A review and analysis of the history of special education and disability advocacy in the United States. *American Educational History Journal*, 42(1), 91–109.

U.S. Department of Education. (2022). *Significant disproportionality reporting under IDEA part B*. <https://www2.ed.gov/policy/speced/guid/idea/monitor/sig-dispro-reports-part-b.html>

U.S. Department of Education. (2023). *A history of the Individuals with Disabilities Education Act*. <https://sites.ed.gov/idea/IDEA-History#1980s-90s>

U.S. Department of Education, Office of Special Education Programs. (n.d.). *Topic areas: Significant disproportionality (equity in IDEA)*. <https://sites.ed.gov/idea/topic-areas/#Significant-Disproportionality>



Voulgarides, C. K. (2018). *Does compliance matter in special education? IDEA and the hidden inequities of practice*. Teachers College Press.

Voulgarides, C. K., Aylward, A., Tefera, A., Artiles, A. J., Alvarado, S. L., & Noguera, P. (2021). Unpacking the logic of compliance in special education: Contextual influences on discipline racial disparities in suburban schools. *Sociology of Education*, 94(3), 208–226. <https://doi.org/10.1177/003804072111013322>

Voulgarides, C. K., Fergus, E., & King Thorius, K. A. (2017). Pursuing equity: Disproportionality in special education and the reframing of technical solutions to address systemic inequities. *Review of Research in Education*, 41(1), 61–87. <https://doi.org/10.3102/0091732x16686947>

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