



September 17, 2026

Public Consulting Group LLC
148 State Street, 10th Floor
Boston, MA 02108
Attn: Michael Howard, Regional Director

**RE: FORMAL NOTICE OF NON-CONFORMANCE - IEP ONLINE 3.0 STATEWIDE
DEPLOYMENT IN WASHINGTON**

Dear Michael,

On September 15, 2026, the Washington School Information Processing Cooperative (WSIPC) Board of Directors took unanimous formal action concerning the current deployment and operation of IEP Online 3.0 in Washington State.

As stated below, the Board directed me, as Chief Executive Officer, to provide Public Consulting Group LLC (PCG) with formal written notice of its determination:

"The Board has directed the CEO to formally notify PCG with formal written notice that the Board considers IEP Online 3.0 to be in a state of non-conformance, requiring remediation. This determination will remain in effect until the Special Education Advisory Council (SEAC) determines that the conditions of PCG have been addressed and the resulting action of PCG has resolved the non-conformance."

WSIPC provides this notice pursuant to Section 1.5, Warranty, of the Master Agreement. Section 1.5, which establishes substantial conformance as an express performance standard, and provides that PCG warrants the Software will substantially conform to the functionality described in Exhibit D through the end of the Term, and expressly recognizes written claims of non-conformance and PCG's responsibility, for a timely written claim of non-conformance, requires PCG to remedy qualifying the non-conformance by repair or replacement, or provide the applicable refund remedy described in the Agreement.

Section 7.1(c) further supports PCG's responsibility for escalated issues pertaining to the use or function of the Software, including Tier 2 and Tier 3 escalations from Participating Entities. WSIPC includes this reference as supporting context for PCG's operational and support obligations related to the unresolved conditions described below.



WSIPC understands the unresolved issues associated with IEP Online 3.0, including the failed software enhancement and resulting customer-impacting conditions, to constitute a written claim of non-conformance with that warranty requiring remediation.

Conditions Requiring Remediation

The Board's determination reflects the continuing statewide impact of unresolved conditions affecting participating school districts. WSIPC recognizes and appreciates the work PCG has undertaken to respond to district concerns; however, material issues remain that prevent the current deployment from meeting the level of functionality and reliability expected of the statewide solution.

1. District Workflow - Resolution of prioritized functionality and process issues that prevent, impair, or materially increase the burden associated with districts completing required special education processes and workflows.

2. Reporting and Compliance Data - Resolution of conditions affecting the accuracy, completeness, reliability, accessibility, and appropriate use of information necessary for district reporting and state and federal special education compliance.

3. User Permissions, Roles, and Lists - Resolution of gaps or deficiencies associated with user access, permissions, roles, administrative functionality, system lists, configuration, and related capabilities necessary for appropriate district operation of IEP Online.

These three categories establish the principal areas of remediation and do not limit the resolution of specific issues within those categories or other directly related conditions necessary to restore appropriate system functionality.

Remediation and Corrective Action

WSIPC expects PCG to continue treating remediation of these conditions as a priority and to provide a coordinated corrective action plan that clearly identifies:

- The specific issues requiring remediation;
- The corrective action planned or underway for each issue;
- Responsible PCG owners;
- Expected completion dates and significant milestones;
- Interim mitigations or workarounds where immediate resolution is not possible;
- Testing and validation processes;
- Known dependencies or risks; and
- A transparent mechanism for communicating status and progress to WSIPC, SEAC, and participating districts.

WSIPC requests that PCG provide this consolidated remediation plan by Friday, September 25, 2026, and identify the PCG executive who will have overall accountability for its execution.

Determination of Restored Conformance

Consistent with the unanimous direction of the WSIPC Board, this determination of non-conformance will remain in effect until the Special Education Advisory Council (SEAC) determines that the identified conditions have been addressed and that PCG's resulting corrective actions have resolved the non-conformance.

SEAC will provide the statewide district voice in this determination and will consider evidence from PCG, WSIPC, participating districts, and the advisory groups addressing:

- Workflow, Improvements, and Training;
- Reporting and Compliance; and
- User Permissions and Roles.

The completion or release of a software modification, by itself, will not necessarily constitute resolution of an identified condition. Resolution should be demonstrated through successful functionality and appropriate validation with the districts that depend upon the solution.

WSIPC will work with PCG to establish an efficient process for bringing completed remediation forward for validation so that resolved conditions can be recognized promptly.

Continuing Partnership and Accountability

IEP Online serves an essential role in supporting Washington school districts and the students and families they serve. WSIPC recognizes the longstanding relationship between PCG, WSIPC, and participating districts and remains committed to working constructively and urgently toward successful resolution.

At the same time, the statewide scope and significance of the current conditions require clear accountability, transparency, and measurable evidence of progress. We expect PCG to dedicate the leadership, product, technical, implementation, and support resources necessary to restore the solution to conformance as rapidly as reasonably possible.

Nothing in this notice constitutes a waiver of any right, protection, claim, or remedy available to WSIPC under the Master Agreement or applicable law. WSIPC expressly reserves all such rights. Continued operation or use of IEP Online during the remediation period should not be interpreted as WSIPC's determination that the identified conditions have been resolved.

WSIPC expects the corrective action plan to establish a clear path from the present state of non-conformance to demonstrable statewide conformance, with urgency proportionate to the impact these conditions are having on Washington school districts and the students they serve.



Please acknowledge receipt of this formal notice in writing and provide the requested corrective action plan by Friday, September 25, 2026.

We appreciate PCG's immediate attention to this matter and look forward to working together toward the resolution necessary to restore confidence in the statewide IEP Online solution.

Sincerely,

Dana Anderson

Chief Executive Officer

Washington School Information Processing Cooperative

cc: WSIPC Board of Directors
Paul Mancini, Manager
Michelle Simmons, Ph.D., Manager
David O'Leary, Associate Manager
Kris Gregoire, Consultant
Special Education Advisory Council