



Monroe County ISD Guidance: IEP Development under the MI Safe Schools Roadmap

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MONROE COUNTY ISD | 1101 S. RAISINVILLE, MONROE, MI 48161

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Introduction

The [MI Safe Schools Roadmap](#), published on June 30, 2020, identifies 6 Phases for planning and implementation as we contemplate what returning to school will look like for the 20-21 school year. IEP development in this new reality requires that we continue to follow the mandates of IDEA and MARSE while adjusting/heightening our focus on certain aspects of the IEP process to ensure that the needs of student are properly addressed and FAPE is delivered regardless of whether schools remain open or are closed due to public health concerns. This document discusses various aspects of IEP Development in the new reality of a COVID-19 world.

DISCLAIMER: This document is not legal advice. The Individuals with Disabilities Education Act is a federal law with extensive regulations regarding the delivery of a free, appropriate, public education to students with disabilities. Each district may adopt more stringent policies/procedures which staff are expected to follow. MCISD will continue to address important distinctions between compliance and recommended practice in technical assistance and training.

Provision of a FAPE



Key Concepts that will be discussed in this section include:

- ❖ **IEP Development in 2020-21 occurs under the umbrella of the MI Safe Schools Roadmap.**
- ❖ **IEP Development in 2020-21 incorporates a Contingency Learning Plan into every IEP for smooth programming shifts necessitated by the public health situation.**

A free, appropriate, public education (FAPE) means services that are provided at no cost to the parent in conformity with a student's IEP. The emergency school closure in the spring of 2020 came as a surprise to most school districts, and both the federal Office of Special Education Programs (OSEP) and Michigan's Office of Special Education (OSE) provided some flexibility to use good faith efforts to deliver FAPE to the extent practicable in light of the circumstances. With the opening of the 2020-21 school year, those flexibilities no longer exist.

The 2020-21 school year has the potential for unpredictable changes in the instructional delivery model for all students, based on changes in the public health situation. Schools/districts must plan for service delivery in six different phases identified in the MI Safe Schools Roadmap. These phases are as follows:

Phase 6	Schools are open for in-person instruction. Minimal required safety protocols.
Phase 5	Schools are open for in-person instruction. Moderate required safety protocols.
Phase 4*	Schools are open for instruction. More stringent required safety protocols.
Phases 1-3	Schools are not open for in-person instruction. Instruction is provided remotely.

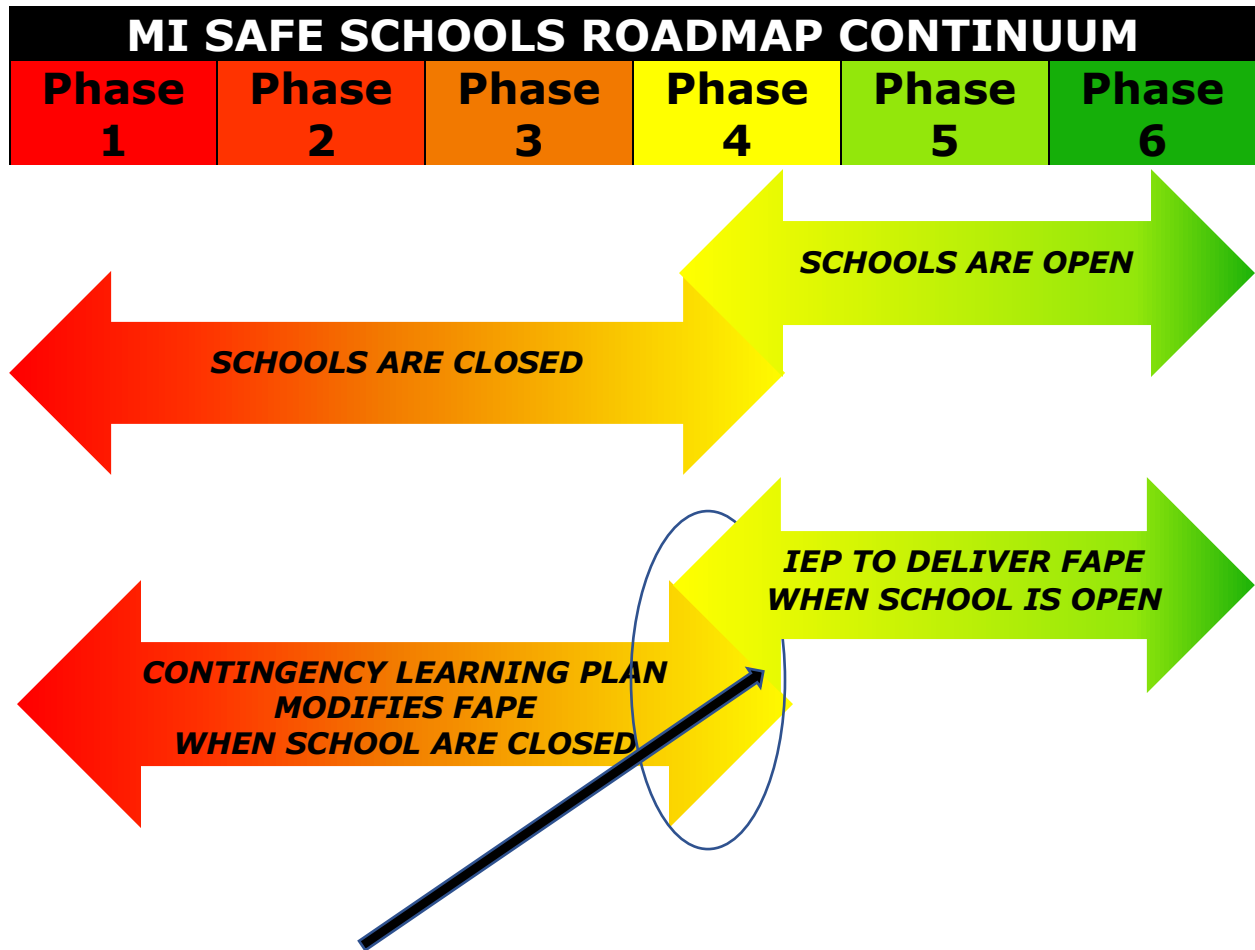
**As of the creation of this document, Phase 4 appears to be the highest phase at which southeast Michigan schools might open in the fall of 2020.*

Because FAPE is described within a document called an IEP, traditionally any change in the delivery of FAPE would require a new IEP or amendment. Each change in the overall delivery model under the MI Safe Schools Roadmap could impact the delivery of FAPE, which typically would mean a new IEP revision or amendment with each change.

Given the unpredictable nature of the pandemic and the likelihood that schools may move back and forth across phases over the course of the school year, holding IEP meetings this frequently could be burdensome for both families and school personnel, and certainly would not facilitate smooth, efficient, and timely shifts in service delivery for students.

Incorporating a Contingency Learning Plan (CLP) into the current IEP will facilitate quick shifts in the instructional delivery model due to changes in the public health situation. This is the kind of thinking that will be required as districts face the potential for shifting efficiently between phases in the MI Safe Schools Roadmap over the course of a single school year. By incorporating a Contingency Learning Plan in the IEP, an IEP revision or amendment would not necessarily be required for each shift between phases, but would be required initially, to address the CLP in the Special Factors section of the PowerSchool for Special Education (PSSE) IEP form.

The early parts of this document focus on considerations for IEP development. In addition, considering the development of a Contingency Learning Plan for each student is likely to save time in the long run when instruction needs to pivot quickly to a new phase of the MI Safe Schools Roadmap. The Contingency Learning Plan is discussed in more detail in the Special Factors section of this document.



Apply the following best practices for IEP development to help the existing IEP move seamlessly across potentially shifting phases:

- Ensure the PLAAFP identifies all current needs including data from both spring and fall 2020. Note any gap in skills and need of increased support.
- Ensure level of support is clearly articulated, specifically if you will be frontloading supports to return to baseline.
- Determine Special Factors/Supplemental Aids/Services (SAS).
- To the extent appropriate for the student, develop annual goals/short term objectives (STOs).
- Consider the need to develop a Contingency Learning Plan (CLP) to address services during a school closure or other shift in the overall delivery model for all students. Document in SAS.
- Use the SAS section to incorporate the Contingency Learning Plan into the IEP by reference and attachment.

IEP Development for the 2020-21 School Year: Considering the Components of FAPE



Key Concepts that will be discussed in this section include:

- ❖ **IEP Development in 2020-21 will require a clear understanding of the MI Safe Schools Roadmap, the District's approved Preparedness Plan under that Roadmap, and, as always, the needs of individual students.**
- ❖ **The District's Preparedness Plan for delivering instruction to all students also serves as the framework for IEP Development in 2020-21.**
- ❖ **IEP Development must address overarching considerations for three main components of FAPE: Equal Access, Involvement and Progress in the General Curriculum, and Specially Designed Instruction relative to IEP Annual Goals and Objectives.**

This guidance document assumes that the reader has a solid understanding of IEP Development when schools are open and operating in a traditional brick-and-mortar model. Those who lack this understanding likely will need to pay close attention to the left-hand column in the 2-column charts that follow beginning on page 11 (Requirements of IDEA/MARSE.)

IEPs that govern the 2020-21 school year should be developed with a clear understanding of:

- [The MI Safe Schools Roadmap](#)
- The District's approved Preparedness Plan under the MI Safe Schools Roadmap.
- The needs of the individual students for whom the IEPs are being developed.

The MI Safe Schools Roadmap provides a framework for delivering instruction to all students. Districts must develop a Preparedness Plan that outlines how this will be accomplished.

The District's Preparedness Plan describes how the general curriculum will be delivered to all students in 2020-21. It also serves as the framework within which IEP Teams individualize instruction for students with disabilities.

When considering the individual needs of students with IEPs and how those needs might be addressed during different phases of the Roadmap, there are three main components of FAPE that must be addressed:

- Equal Access
- Involvement and Progress in the General Curriculum
- Specially Designed Instruction relative to IEP Goals and Objectives

The charts on the next three pages discuss the overarching considerations of these three components that are critical to the provision of FAPE in a potentially shifting environment.

The remainder of this document discusses each section of the PowerSchool for Special Education (PSSE) IEP form, outlining additional considerations that will be necessary as IEP Teams develop IEPs to deliver a FAPE in response to changes in the public health situation.

Overarching Considerations for FAPE across Phases: **EQUAL ACCESS**

The most basic component of a FAPE has to do with equal access to learning opportunities for students with disabilities, including access to nonacademic and extracurricular activities. Questions to keep in mind during IEP development include:

Context Considerations:

- What learning opportunities/activities are provided to all students, both when schools are open and when schools are closed?
- How, to what extent, and with what kinds of support does this student typically (when school is open) participate in the learning opportunities provided to all students, including nonacademic/extracurricular activities?

Planning Considerations:

- Does this student require accommodations/modifications or other supplementary aids and supports to access the learning opportunities being provided to all students when schools are closed?
- Are those accommodations/modifications described in the supplementary aids section of the current IEP?
- Are there other accommodations/modifications that will become necessary if the district/school moves to a distance learning model?

Implementation Considerations:

- Does the student have meaningful access to the technology necessary to access instructional services in a distance learning model?
- How will general education teachers be informed about accommodations and modifications or supplementary aids that need to be implemented in a distance learning model?
- How will staff members document that accommodations/modifications and supplementary aids/supports are provided in a distance learning model?
- Do general education teachers or special education teachers/providers require any additional PD/support to facilitate equal access to learning opportunities in a distance learning model?
- What consultation or support might parents or caregivers need to facilitate equal access to learning opportunities and implementation of accommodations and modifications in a distance learning model?

Overarching Considerations for FAPE across Phases: INVOLVEMENT/PROGRESS IN THE GENERAL CURRICULUM

A second major component of a FAPE has to do with involvement and progress in the general curriculum. Questions to keep in mind during IEP development include:

Context Considerations:

- How and to what extent does this student typically (when school is open) interact with the general curriculum?
 - Does the student typically receive instruction in the Common Core State Standards/GLCEs for some/all subject areas?
 - Does the student typically interact with the general curriculum for ELA or Math via the Essential Elements at the high, medium, or low range of complexity?
 - Does the student typically interact with the general curriculum for Science or Social Studies via the EGLCEs at the functional, supported or participation range?
 - What supplementary aids/supports does the student require to continue to participate in the general curriculum?

Planning Considerations:

- How can we structure learning opportunities that will continue to allow the student to interact with the general curriculum in a similar manner/extent while in a distance learning model?
- What alternate materials or delivery methods are individually appropriate when school is closed under an approved MI Safe Schools Roadmap plan?
- Are there supplementary aids/supports listed in the current IEP that continue to be necessary for the student to be involved and progress in the general curriculum via a distance learning model?
- Does the distance learning model of instructional delivery suggest that new/additional supplementary aids may be necessary?

Implementation Considerations

- Do general education teachers or special education teachers/providers require any additional PD/support to facilitate equal access to learning opportunities in a distance learning model?
- What consultation/support might parents/caregivers need to ensure that the student is involved and progresses in the general curriculum while in a distance learning model?

Overarching Considerations for FAPE across Phases: SPECIALLY DESIGNED INSTRUCTION RELATIVE TO IEP GOALS/OBJECTIVES

A third major component of a FAPE has to do with specially designed instruction relative to individual IEP goals and objectives. Questions to keep in mind during IEP development include:

Context Considerations:

- How can we construct IEP goals/objectives that are meaningful and appropriate targets for specially designed instruction regardless of the delivery model (brick-and-mortar vs. distance learning)?
- If some goals/objectives are not appropriate for specially designed instruction in a distance learning model, how might those goals/objectives be modified so that meaningful progress can continue via distance learning?

Planning Considerations:

- What types of specially designed instruction (programs and related services) need to be provided in a distance learning model so that the student can continue to progress toward the IEP goals/objectives?
- What materials or delivery methods are individually appropriate during distance learning?
- If the student typically receives instruction on IEP goals/objectives in a small group setting, can that small group setting be replicated using technology?
- Are there supplementary aids/supports listed in the current IEP that continue to be necessary for the student to progress toward IEP goals/objectives in a distance learning model?
- Does the student's spring 2020 experience in a distance learning model suggest that different/additional supplementary aids may be necessary?

Implementation Considerations:

- How will staff members document the provision of specially designed instruction and supplementary aids/supports in a distance learning model?
- How will staff members monitor student progress toward IEP goals/objectives in a distance learning model and report that progress to parents?
- Do special education teachers/providers require any additional PD/support to implement specially designed instruction and progress monitoring in a distance learning model?
- What consultation/support might parents/caregivers need to facilitate specially designed instruction in a distance learning model?

IEP Scheduling and Participants



Key Concepts that will be discussed in this section include:

- ❖ **IEP meetings must be scheduled at a time and location that is mutually agreeable for the parent and the school district, including IEP meetings held in virtual formats.**
- ❖ **The required participants in IEP meetings remain the same during a school closure.**
- ❖ **Prior agreement must be obtained to excuse a required IEP team participant.**

§300.321 of the Individuals with Disabilities Education Act (IDEA) identifies the required members of the IEP Team. This section of IDEA also describes the procedures for excusing required members of the IEP Team from the meeting.

MARSE 340.1721e was modified in February of 2020 to require that the resident district be invited to participate in every IEP meeting for students who are placed in center programs or other placements outside the resident district.

The cover page of the IEP includes basic demographic information as well as the names of individuals who participated in the IEP meeting. The chart below discusses special considerations that may be necessary relative to IEP scheduling and participants if the district is closed to in-person instruction and meetings.

Requirements of IDEA/MARSE	Additional Considerations as a Result of COVID-19
<p>Prior to scheduling the IEP meeting or sending a written invitation, the individual who is responsible for scheduling the IEP Team meeting shall contact the parent to determine a mutually agreeable time and location for the meeting.</p> <p>All attempts to contact the parent, including the date, method, and results of the contact, shall be documented in the PowerSchool Special Education (PSSE) Contact Log.</p>	<p>This same requirement applies during a school closure/distance learning; however, the "location" may be a virtual meeting. A virtual meeting may be conducted by telephone/conference call, Facetime, Skype, Zoom, GoToMeeting, or other virtual collaboration platforms.</p> <p>If the parent and the district agree that a virtual IEP meeting is appropriate, the district must ensure that the parent has a meaningful opportunity to participate</p>

	<p>in the platform that is used. This includes the parent having access to and comfort with the platform, as well as a willingness to participate via this mode.</p> <p>Conversations regarding the scheduling of the meeting should be documented in the PSSE Contact Log.</p> <p>The formal, written invitation to a virtual IEP meeting should include a statement that the meeting is being held virtually and the name of the platform being used.</p>
<p>At a minimum, all the following individuals shall be invited to participate in the IEP Team meeting via a formal, written invitation/notice:</p> <ul style="list-style-type: none"> • The parents of the child; • At least one regular education teacher of the child (if the child is, or may be, participating in the regular education environment); • At least one special education teacher or service provider of the child; • A representative of the school district who meets all the following criteria: <ul style="list-style-type: none"> ○ Is qualified to provide, or supervise the provision of, specially designed instruction to meet the unique needs of children with disabilities, ○ Is knowledgeable about the general education curriculum, ○ Is knowledgeable about the availability of resources of the school district; • At the discretion of the parent or the school district, other individuals who have knowledge or special expertise regarding the 	<p>A virtual IEP meeting requires the same participants as a face-to-face IEP meeting.</p> <p>If a meeting is being held in other than a face-to-face format, it will be important to ensure, in advance of the meeting, that all participants have access to the platform being used. This could be handled on a case-by-case basis as meetings are scheduled. It also might be handled via a survey to all parents early in the school year.</p>

<p>child, including related services personnel as appropriate (NOTE: <i>knowledge/expertise is determined by the party who invites the individual</i>);</p> <ul style="list-style-type: none"> • Whenever appropriate, the child with a disability. • For a student placed by the resident district in a program outside the resident district, a representative of the resident district must participate in the IEP meeting. <p>As a member of the IEP Team, a regular education teacher of the child must, to the extent appropriate, participate in the development of the IEP, including the determination of appropriate positive behavioral interventions and supports and other strategies for the child; and supplementary aids and services, program modifications, and support for school personnel.</p> <p>The IEP Team also must include an individual who can interpret the instructional implications of evaluation results. This may be an individual who is already listed above as a required participant. The identity of this individual must be noted on the first page of the PSSE IEP form.</p> <p>If a purpose of the meeting is the consideration of postsecondary goals for the student and the transition services needed to assist the student in reaching those goals, the school district must invite the student to the IEP meeting.</p> <p>If the student does not attend the IEP Team meeting, the school district must take other steps to ensure that the</p>	
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<p>student's preferences and interests are considered.</p> <p>Additionally, the school district must invite a representative of any participating agency that is likely to be responsible for providing or paying for transition services. Parent (or student, if he/she has reached the age of majority) consent to invite the agency is required and must be in writing using the District's approved form.</p> <p>If the student is placed by the resident district in a program outside of the resident district, the resident district must be invited to participate in each IEP meeting. This includes placements such as center programs operated by the intermediate school district or another local school district; programs operated under a cooperative agreement or consortium model; private school placements arranged and funded by the resident district; and programs run by the state on behalf of constituent districts, such as the Michigan School for the Deaf.</p>	
<p>IEP Team members are expected to be present for the entire IEP meeting unless they have been excused under one of the following two provisions:</p> <ol style="list-style-type: none"> 1. A member of the IEP Team is not required to attend an IEP Team meeting, in whole or in part, if the parent of a child with a disability and the school district agree, in writing, that the attendance of the member is not necessary because the member's area of the curriculum or related services is not being modified or discussed in the meeting. 2. A member of the IEP Team may be excused from attending an IEP Team meeting, in whole or in 	<p>The procedures for IEP participation apply to both face-to-face and virtual meetings.</p> <p>IEP Team members are expected to be present (logged in and participating) in IEP meetings that are held virtually for the duration of the meeting.</p> <p>The procedures for excusing IEP Team participants apply to both face-to-face and virtual meetings.</p> <p>The requirement for written agreement to excuse a participant may pose a greater challenge when meetings are held virtually and/or when the public health situation restricts person-to-</p>

<p>part, even when the meeting involves a modification to or discussion of the member's area of the curriculum or related services, as long as the parent and the school district consent to the excusal in writing and the team member submits input into the development of the IEP in writing to the parent and the IEP Team prior to the meeting.</p> <p>Prior to excusing a required participant from the IEP meeting, and prior to the meeting itself, someone from the school district must contact the parent to discuss whether the parent agrees that the team member's participation is not necessary for all or part of the meeting.</p> <p>The individual responsible for contacting the parent regarding the excusal must obtain the written permission of the parent to excuse the member and document the date and outcome of the conversation with the parent in the PSSE Contact Log.</p> <p>If either the district or parent disagrees that the team member's attendance is not necessary for all or part of the meeting, the team member must attend the meeting as scheduled and/or the meeting must be rescheduled.</p> <p>It is the responsibility of the team member who will not be attending the meeting to ensure that his/her written input regarding IEP development is submitted to the parent and to other members of the IEP Team prior to the scheduled IEP meeting, and to ensure that this written input is uploaded into PSSE.</p>	<p>person contact, making advance planning even more critical than usual.</p> <p>Similarly, the requirement that the excused individual provide written input to the IEP Team still applies to virtual meetings. The person being excused will need to consider how that input can be provided in advance of the meeting via a method that ensures the confidentiality of personally identifiable, student-level information.</p>
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<p>The cover page of the IEP form lists the individuals who participated in the IEP meeting. MCISD recommends that participants sign or initial their name on the cover page to verify their attendance. Keep accurate record of who participated and who is excused.</p> <p>Document the decision to excuse a required team member in Notice.</p>	<p>The participants must be listed on the cover page of the IEP even when the IEP meeting occurs virtually.</p> <p>There is no requirement in IDEA/MARSE that the participants sign or initial the cover page and obtaining participant signatures may not be feasible in a virtual environment.</p> <p>Document the decision to excuse a required team member and continue the IEP in Notice.</p>
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Present Level of Academic Achievement and Functional Performance: The Heart of the IEP



Key Concepts that will be discussed in this section include:

- ❖ **The PLAAFP is more than a single page/section of the IEP.**
- ❖ **Needs identified in any part of the PLAAFP must be addressed later in the IEP.**
- ❖ **When developing IEPs in 2020-21 it will be important to consider not just the student's performance in a traditional brick and mortar setting but also in a virtual/distance learning environment.**

§300.320 of the Individuals with Disabilities Education Act (IDEA) defines the content of an individualized education program. The IEP must include a statement of the child's present levels of academic achievement and functional performance, including how the child's disability affects the child's involvement and progress in the general education curriculum (i.e., the same curriculum as for nondisabled children.) For preschool children, as appropriate, the IEP must include how the disability affects the child's participation in appropriate activities.

§300.324 of IDEA indicates that in developing each child's IEP, the IEP Team must consider

- the strengths of the child;
- the concerns of the parents for enhancing the education of their child;
- the results of the initial or most recent evaluation of the child;
- the academic, developmental, and functional needs of the child;
- the communication needs of the child; and
- whether the child needs assistive technology devices and services.
- the use of positive behavioral interventions and supports, and other strategies, to address that behavior for students whose behavior impedes their learning or that of others.
- the language needs of the child as those needs relate to the child's IEP for students with limited English proficiency.
- provision of instruction in Braille and the use of Braille for students who are blind or visually impaired.
- the child's language and communication needs, opportunities for direct communications with peers and professional personnel in the child's language and communication mode, academic level, and full range of needs, including

opportunities for direct instruction in the child's language and communication mode, for students who are deaf or hard of hearing.

The principles of IDEA/MARSE continue to apply to IEP development regardless of the instructional delivery model adopted by the district in response to the public health situation. The district has an obligation to deliver FAPE as defined in an IEP in all phases of the MI Safe Schools Roadmap.

For all IEPs, the foundation for decision making begins with a well-written Present Level of Academic Achievement and Functional Performance (PLAAFP) which accurately describes the student's strengths and needs, including how the student's disability impacts involvement and progress in the general curriculum. The PLAAFP is not only the page that's labeled "PLAAFP" but also includes other sections of the IEP such as the Participants/Profile, Supplementary Aids/Services, the baseline data section of the Goal Page, and the Transition pages. Together, all these sections tell a story of the student's current functioning, and together they serve as the foundation that drives the rest of the IEP.

New information has undoubtedly come to light regarding how instruction was provided during the spring 2020 closure, how the student participated in and responded to that instruction, and how progress toward IEP goals and in the general curriculum were impacted by the school closure. Newly identified strengths may have emerged during the distance learning experience, or the experience might have revealed additional needs that should be addressed. Parents may have new insights about the student or different concerns or priorities because of the spring 2020 distance learning experience. Progress that was impacted by the school closure may suggest a need for different or additional services. It will be critical that the entire story is captured in the PLAAFP to inform decisions later in the IEP.

Needs identified in any part of the PLAAFP must be addressed in at least one of four ways:

- By a supplementary aid/support, and/or...
- By a measurable annual goal or short-term objective, and/or...
- By a special education program or related service, or...
- On the Prior Written Notice page under the "options considered and not selected."

Participants and Profile Section



Key Concepts that will be discussed in this section include:

- ❖ **Parent input is critical to IEP Development, particularly since the spring 2020 school closure when parents were able to observe students first-hand during distance learning.**
- ❖ **Progress data for annual goals should be reported and analyzed for multiple data collection periods, including before the spring 2020 closure, during the spring 2020 closure, upon return to school in the fall of 2020, after any necessary reteaching in the fall, and immediately prior to the IEP meeting.**
- ❖ **Information about progress in the general curriculum prior to, during, and after the spring 2020 closure will be critical to informing decisions at the next IEP meeting.**

§300.324 of the Individuals with Disabilities Education Act (IDEA) describes the process for developing an individualized education program for a student with a disability. In developing each child's IEP, the IEP Team must consider all the following:

- the strengths of the child.
- the concerns of the parents for enhancing the education of their child.
- the results of the initial or most recent evaluation of the child.
- the academic, developmental, and functional needs of the child.

The Participants and Profile section of the PSSE IEP form includes a description of the student's strengths, parent concerns, developmental and functional needs, progress toward current IEP goals and objectives, progress in the general curriculum and/or regular education environment, and anticipated needs or other matters. The following chart discusses additional considerations.

Requirements of IDEA/MARSE	Additional Considerations as a Result of COVID-19
The IEP must describe the student's strengths.	In addition to the general strengths that are typically described in this section, the student's strengths relative to distance learning should be documented here.

	<p>For example:</p> <ul style="list-style-type: none"> •Has the student shown strong skills in accessing and using technology for learning? •Has the student demonstrated notably effective engagement in the virtual environment (specifically in the spring of 2020)? •Does the student have personal strengths (organization, persistence, attention, etc.) which lend themselves particularly well to a virtual delivery model? <p>Conversely, does the student have strengths which <i>cannot</i> be leveraged well in a distance learning environment? For example:</p> <ul style="list-style-type: none"> •Does the student learn best by modeling peers who may not be readily available in a virtual situation? •Does the student tend to gain skills when there is a daily opportunity for practice/feedback which may not be feasible given a distance learning model? •Does the student have leadership skills that typically can be tapped as a reward for positive behavior, but are difficult to leverage in distance learning? <p>The relationship between the student's strengths and a distance learning model (for which there is serious potential in the coming school year) should be discussed and documented in this section of the IEP. Data and observations from the spring of 2020 school closure experience likely will be helpful to include here, as that</p>
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	experience informs future decision-making for distance learning.
The IEP must describe the parent's concerns for enhancing the student's education.	<p>While parents may share the same concerns that they've always had for the student's learning/progress, they may have additional concerns after their first-hand experience with distance learning and observing their student's academic, behavioral, communication, and physical skills in a virtual learning environment in the spring of 2020. Therefore, in addition to typical parent considerations, the IEP Team should consider the following:</p> <ul style="list-style-type: none"> • Can the parents/caregiver provide feedback about the student's behavioral progress such as strengths, weaknesses, and/or other observations? • Can the parents/caregiver provide feedback about the student's academic progress such as strengths, weaknesses, and/or other observations? • If any Assistive Technology was provided in the home in the spring of 2020, was it functioning properly, correctly installed, and appropriate for the student's needs? • What was the parent's experience with communication and information flow between district staff/service providers and the family during the closure? • Have any new behaviors surfaced and/or life events occurred that may impact the student's academic and/or social success upon return to school? • Was there anyone in the home who could ensure braille materials were correct and the student was able to use a braille writer correctly?

	<ul style="list-style-type: none"> • What feedback can the parent/caregiver provide about the student's status, difficulties, or successes with self-help skills? • Was there a predictable schedule followed at home during the closure? <p>This section also may address the parent's report of their ability to effectively support ongoing distance learning throughout the school year.</p> <p>If the parent reports a need for additional consultation/support in the home setting during distance learning experiences, document in SAS or Notice that the concern will be addressed in the CLP should the need arise.</p> <p>If parent concerns identified in this section are NOT addressed later in the IEP, an explanation must be included on the Notice of an Offer of FAPE page.</p>
<p>The IEP must describe the student's developmental and functional needs.</p> <p>(In our PSSE system, this happens in the PLAAFP section.)</p>	<p>In addition to any needs that typically would be documented in this section, the IEP Team should consider the following:</p> <ul style="list-style-type: none"> • Did any needs surface in the spring 2020 experience which are unique to a distance learning situation? • Did the school closure experience in the spring of 2020 trigger ideas about any additional needs? • Are there any specific concerns that exist relative to a potential school closure in the upcoming school year? <p>Data and observations from the spring 2020 school closure experience likely will be helpful to include here, as that experience informs future decision-making for distance learning. If data</p>

	<p>from the spring 2020 closure are unavailable for any reason, that also should be explained here.</p> <p>If needs identified in this section are NOT addressed later in the IEP, an explanation must be included on the Notice of an Offer of FAPE page.</p>
<p>The IEP must describe the student's progress toward the annual goals/STOs in the current IEP.</p> <p>Progress toward IEP goals is typically documented in progress reports with a summary description being documented in the new IEP. Status on previous goals/STOs is critical to know, as it sets a baseline for establishing new annual goals/STOs.</p> <p>Progress toward IEP goals is addressed in the PLAAFP section in the PSSE IEP form.</p>	<p>In addition to typical IEP development, the IEP Team should consider the following:</p> <ul style="list-style-type: none"> • What was the student's progress toward IEP goals/objectives before the spring 2020 school closure? • How did the student access instruction during the school closure? • Describe the progress toward IEP goals during the school closure. • What was the student's status relative to IEP goals when school resumed in the fall of 2020? • If the student showed an unexpected loss or regression of skills in the fall of 2020, how long did it take the student to regain those skills with reteaching? • What is the student's status relative to IEP goals at the time of this IEP meeting? <p>Progress monitoring procedures may have required modification during the spring 2020 school closure. End-of-year progress reports from June 2020 may reflect modified methods of measurement and may not reflect progress on the goals/STOs as originally written. This should be explained/documented in this section. It is the responsibility of the IEP Team to consider the impact of missed learning opportunities during the spring 2020 school closure on progress toward</p>

	<p>annual goals. It will be critical for providers to assess the status of IEP goals/STOs upon return to school. It may be necessary to consult with teacher(s) from the previous school year to understand how the student's performance has changed. To the extent that the student has regressed and requires re-teaching, this re-teaching should be provided. Progress monitoring data from reteaching should be collected for consideration by the IEP Team. This data should be explained/documented in this section.</p> <p>Goals/objectives that have continued from a 2019-20 IEP into the 2020-21 school year should be progress monitored as written, with progress reported according the schedule defined in the IEP, unless there is an IEP review or amendment to change the goal, criteria, method of measurement, or schedule for evaluation. Progress monitoring data from both the 2019-20 and the 2020-21 school year should be explained/documented in this section.</p> <p>Because the new IEP may be developed some weeks or months into the new school year, it will be critical that service providers assess student progress on each goal/STO immediately prior to the 2020-21 IEP meeting. This up-to-date progress monitoring data should be reported in this section as it will assist with all the following:</p> <ul style="list-style-type: none">• establishing a baseline for new goals (although additional, informal assessment of the next skill in the hierarchy also may be necessary for this purpose); and• determining if/how the IEP needs to be modified to assist the student in recovering from any disproportionate, adverse impact
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	<p>of the spring 2020 school closure; and</p> <ul style="list-style-type: none"> informing decision-making about the need for Extended School Year services in the new IEP. <p>For all these reasons, at the time of the new IEP or IEP amendment, service providers should provide definitive, summative data to show whether each annual goal/STO in the previous IEP was achieved as written.</p>
<p>The IEP must describe the student's progress in the general education curriculum and/or regular education environment.</p> <p>Care should be taken that this section reflects progress across the curriculum and not merely progress in one class/subject as reported by one teacher who attends the IEP.</p> <p>This will be documented in the PLAAFP section.</p>	<p>In addition to typical IEP development, the IEP Team should consider the following:</p> <ul style="list-style-type: none"> What was the student's progress in the general curriculum before the school closure? How did the student access the general curriculum during the school closure? What progress was the student able to demonstrate during distance learning? Can the teacher(s) provide feedback for the student's academic and behavioral progress such as: <ul style="list-style-type: none"> Is the student's response to instruction in a virtual setting like or different from the response in a typical classroom setting? Did work completion improve or decline during virtual instruction in the spring of 2020? What strategies have worked well for this student in the virtual setting versus a traditional classroom setting? What strategies have been less effective? Is the student's response to virtual instruction

	<p>markedly different than that of typical peers, or are the student's struggles similar to what other students experience?</p> <p>If concerns identified in this section are NOT addressed later in the IEP, an explanation must be included on the Notice of an Offer of FAPE page.</p>
<p>The IEP must describe the student's anticipated needs or other matters (e.g., high school credits, cohort group, curriculum planning, etc.)</p> <p>One use for this section is to identify "priority needs" which will be addressed later in the IEP. This is one strategy for highlighting specific needs identified in the entire PLAAFP and ensuring they are addressed later in the IEP.</p> <p>This will be documented in the PLAAFP section, or the "other considerations" section of the PSSE IEP Form.</p>	<p>In addition to typical IEP development, the IEP Team should consider the following:</p> <ul style="list-style-type: none"> • Describe any "high leverage" teaching practices that already have been incorporated into the school day to account for expected or unexpected loss due to missed learning opportunities in the spring of 2020. • Describe any other special considerations that may be necessary to support the student's academic, behavioral, and developmental needs during distance learning. <p>If needs identified in this section are NOT addressed later in the IEP, an explanation must be included on the Notice of an Offer of FAPE page.</p>

PLAAFP Page



Key Concepts that will be discussed in this section include:

- ❖ **The PLAAFP should include information about how the student functions in both a traditional, brick-and-mortar setting and how the student functions in a distance learning situation.**
- ❖ **The PLAAFP should describe how the student's disability impacts involvement and progress in the general curriculum, not just in a traditional, brick-and-mortar environment but in a distance learning situation as well.**

300.320 of the Individuals with Disabilities Education Act (IDEA) defines the content of an individualized education program. The IEP must include a statement of the child's present levels of academic achievement and functional performance, including how the child's disability affects the child's involvement and progress in the general education curriculum (i.e., the same curriculum as for nondisabled children.) For preschool children, as appropriate, the IEP must include how the disability affects the child's participation in appropriate activities.

The PLAAFP tells the story of the student's progress over the past year (since the last IEP up to the present). Clearly, any student's "story" for 2019-20 would be incomplete if it does not address the spring 2020 school closure. The provision of distance learning opportunities may have shed light additional information about the student's strengths and needs. Missed learning opportunities during the spring 2020 school closure may have disproportionately impacted the student's forward progress due to his/her disability. The return to school may reveal additional needs, for example, in the social-emotional area, that were not present prior to the closure. This additional information must be documented in the PLAAFP so that appropriate programming decisions may be made relative to FAPE, helping the student "recover" from or get back on track after the school closure, and/or the need for different or additional services or supports in the new IEP.

The following table discusses additional considerations for the development of the PLAAFP because of the COVID-19 pandemic and related school closures.

Requirements of IDEA/MARSE	Additional Considerations as a Result of COVID-19
<p>Gather available data regarding the student's performance from a variety of sources, such as (but not limited to):</p> <ul style="list-style-type: none"> • Classroom-based and provider-based observations or reports regarding the student's strengths and needs; • Information/concerns shared by the parent; • Current assessment results, including classroom-based assessments as well as districtwide, statewide, and transition assessments; • Report cards/progress reports; • Results of the most recent evaluation or reevaluation; • Progress monitoring data relative to previous IEP goals/STOs; • Data regarding implementation of the positive behavior support plan; • School attendance records; • Discipline logs; • Health/medical information; • Information regarding the student's communication skills and proficiency in the English language; • Data from worksite-based learning or work experience situations; • Information regarding assistive technology which has been or may be necessary/helpful for the student, or presenting issues in the classroom which might be supported via assistive technology; and/or • Any other information that is available in the student's educational record. 	<p>Gather available data regarding the student's performance during the implementation of the District's Continuity of Learning Plan in spring 2020, considering the following:</p> <ul style="list-style-type: none"> • During the spring 2020 school closure, was the student able to progress toward IEP goals and objectives? • How did the student engage with the learning activities provided under the Continuity of Learning Plan? • Consider all relevant data shared by the parent as it relates to: <ul style="list-style-type: none"> ○ the parent's ability to assist with instruction, ○ access to materials and technology, and ○ how conducive the home environment is to an ability to engage in and make progress with the learning objectives.

<p>Based on the available data, develop a written statement (which likely will be a series of statements) regarding the student's current level of functioning in every area of need resulting from the student's disability. This statement:</p> <ul style="list-style-type: none"> • Must be written in language understandable to the general public; • Must include baseline data which describes how the student is performing at the time of the IEP with sufficient specificity to serve as a starting point for further instruction; • Should include both narrative and numeric data. If test scores are listed to describe the current level of performance, there also should be an explanation of what those scores mean; • May include historical data/scores for the purpose of providing context or highlighting growth/change over time (or the lack thereof); • Must clearly identify the needs that result from the student's disability; • Must describe not only academic needs, but also social/behavioral, communication, perceptual/motor, and health needs, as well as any other needs that result from the student's disability; • Must address <i>how</i> the student's disability and resulting needs impact the student's progress in the general curriculum (or, for preschool students, 	<p>The PLAAFP page should include information about how the student functions in both a traditional, brick-and-mortar setting and how the student functions in a distance learning situation. Needs in both situations should be clearly articulated.</p> <p>In creating an impact statement about how the student's disability affects involvement and progress in the general curriculum, it will be critical for the IEP Team to clearly articulate how the disability impacts involvement not only in a traditional brick-and-mortar setting, but also how the disability impacts involvement in distance learning.</p> <p>Data and observations from the spring 2020 school closure experience likely will be helpful to include here as that experience informs future decision-making for distance learning.</p> <p>If needs identified in this section are NOT addressed later in the IEP, an explanation must be included on the Notice of an Offer of FAPE page.</p>
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<p>participation in age-appropriate activities);</p> <ul style="list-style-type: none"> • Must be documented in writing in one or more of the following sections of the PowerSchool Special Programs IEP form based on the prompts provided on the form: <ul style="list-style-type: none"> ○ PLAAFP Page, ○ Participants and Profile section, ○ Special Considerations section, ○ Baseline data section of the goal page, and/or ○ Postsecondary transition section. <p>NOTE: Section 300.320(b)(7)(d) of IDEA indicates that, "nothing...requires the IEP Team to include information under one component of a child's IEP that is already contained under another component of the child's IEP." This means that redundant data entry is not required for compliance with IDEA. However, the converse is also true: if information about the student's current performance is included in any section of the IEP, it must be regarded as part of the PLAAFP. Therefore, a complete review of the IEP is necessary to determine the student's present level of performance and related needs.</p>	
<p>After completing the statement(s) about the student's current level of functioning, the IEP Team will use the present level statement(s) to drive the rest of the IEP. The IEP Team must review the student's present level of academic achievement and functional performance to determine:</p> <ul style="list-style-type: none"> • which needs will be addressed by a supplementary aid or support, 	

<ul style="list-style-type: none">• which needs will be addressed by a measurable annual goal/STO, and• which needs will be addressed by a program or service. <p>If it is determined that an identified need will not be addressed in the IEP, this decision must be documented on the "Notice of an Offer of a FAPE."</p>	
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Consideration of Special Factors



Key Concepts that will be discussed in this section include:

- ❖ **The IEP team should consider whether the student is experiencing new/different behavioral issues as a result of the pandemic and related school closures.**
- ❖ **The IEP Team should explore whether the student's medical/health status has changed during the school closure and/or whether an underlying health condition creates heightened vulnerability during the pandemic and related school closures.**
- ❖ **The IEP Team should consider how the student's perceptual/motor/mobility needs impact the ability to effectively engage in distance learning.**
- ❖ **The IEP Team should consider the need for a Contingency Learning Plan and address in this section or Notice.**

§300.324 of the Individuals with Disabilities Education Act (IDEA) describes the process for developing an individualized education program for a student with a disability. In developing each child's IEP, the IEP Team must consider all the following:

- the communication needs of the child.
- whether the child needs assistive technology devices and services.
- In the case of a child whose behavior impedes the child's learning or that of others, the IEP Team must consider the use of positive behavioral interventions and supports, and other strategies, to address that behavior.
- In the case of a child with limited English proficiency, the IEP must consider the language needs of the child as those needs relate to the child's IEP.
- In the case of a child who is blind or visually impaired, the IEP Team must provide for instruction in Braille and the use of Braille unless the IEP Team determines, after an evaluation of the child's reading and writing skills, needs, and appropriate reading and writing media (including an evaluation of the child's future needs for instruction in Braille or the use of Braille), that instruction in Braille or the use of Braille is not appropriate for the child.

The Consideration of Special Factors section of the PSSE IEP form documents the considerations listed above. This section is likely to require heightened consideration if school is not operating in the traditional, full time, brick-and-mortar model. The following chart discusses those additional considerations.

Requirements of IDEA/MARSE	Additional Considerations as a Result of COVID-19
<p>The IEP must document consideration of whether the student has behavior that impedes the learning of self or others.</p> <p>If the student has such behavior, the IEP must identify the positive behavior interventions and supports and other strategies that will be used to address the behavior.</p>	<p>This requirement still applies and will require heightened consideration.</p> <p>It is widely anticipated that many students will experience some social-emotional impact due to the spring 2020 school closure. Even students who previously had no social, emotional, or behavioral issues may present with new challenges upon return to school in the fall of 2020. This impact likely will be heightened for students who already have trauma in their backgrounds. All these issues may be exacerbated if additional school closures are necessary during the 2020-21 school year.</p> <p>IEP Teams will need to carefully consider how social/emotional factors related to the previous (or potential future) school closure impact student learning. This may drive the need for:</p> <ul style="list-style-type: none"> • Services provided through a general education counselor or behavior interventionist. • New/different supplementary aids/supports in the IEP. • A new/revised positive behavior support plan. • Additional assessments/data gathering to pinpoint needs (i.e., Functional Behavioral Assessment.) • Additional related services such as school social work in the IEP. • Coordination with an outside agency to provide additional support in the home and the community. <p>Observations and data gathered during the spring 2020 school closure and</p>

	<p>upon return to school will be critical to informing this consideration.</p> <p>If needs identified in this section are NOT addressed later in the IEP, an explanation must be included on the Notice of an Offer of FAPE page.</p>
<p>The IEP must document consideration of whether the student has limited English proficiency.</p> <p>If the student does have limited English proficiency, the IEP Team must consider the student's language needs when developing the IEP.</p>	<p>Like students with disabilities, students with limited English proficiency (LEP) may experience disproportionate challenges and more significant impact on learning loss during school closures or distance learning. When a student has BOTH limited English proficiency and a disability, the implications may be even more significant.</p> <p>Observations and data gathered during the spring 2020 school closure will be critical to informing these considerations and determination of whether a Contingency Learning Plan may be necessary.</p> <p>If needs identified in this section are NOT addressed later in the IEP, an explanation must be included on the Notice of an Offer of FAPE page.</p>
<p>The IEP must document consideration of whether the student has blindness or a visual impairment.</p> <p>If the student has blindness or a visual impairment, the IEP must provide for instruction in Braille and the use of Braille, unless the IEP Team determines that instruction in Braille is not appropriate for the student after an evaluation of the student's reading and writing skills, needs, and appropriate reading and writing media, including evaluation of future needs for instruction in Braille or the use of Braille.</p>	<p>Students with blindness or visual impairments will experience significant challenges when distance learning relies on technology that emphasizes the visual mode. It is incumbent upon IEP Teams to consider how students with vision challenges will interact with instruction in a distance learning model.</p> <p>Students who require orientation and mobility support may be additionally impacted because O&M goals often focus on getting around in the larger community. These goals may not be feasible when schools are closed to in-person instruction because instruction in community-based settings may not be safe. A Contingency Learning Plan may be used to identify how annual</p>

	<p>goals/STOs will be modified during a school closure to address this concern.</p> <p>Observations and data gathered during the spring 2020 school closure will be critical to informing these considerations.</p> <p>If needs identified in this section are NOT addressed later in the IEP, an explanation must be included on the Notice of an Offer of FAPE page.</p>
<p>The IEP must document consideration of whether the student is deaf or hard of hearing.</p> <p>If the student is deaf or hard of hearing, the IEP must address the student's communication needs.</p>	<p>Students who are deaf or hard of hearing may experience significant challenges when distance learning relies on technology that emphasizes the auditory mode.</p> <p>Observations and data gathered during the spring 2020 school closure will be critical to informing these considerations and determination of whether a Contingency Learning Plan may be necessary.</p> <p>A Contingency Learning Plan may be used to identify how annual goals/STOs or supplementary aids will be modified during school closure.</p> <p>If needs identified in this section are NOT addressed later in the IEP, an explanation must be included on the Notice of an Offer of FAPE page.</p>
<p>The IEP must document consideration of whether the student has any health, physical, and/or medical issues that may impact learning.</p>	<p>Some students with underlying health conditions will be more vulnerable if exposed to COVID-19. IEP Teams need to be aware of this vulnerability to identify what precautions will be put in place for each student. Close coordination with parents and medical providers likely will be necessary to accomplish this.</p> <p>A student's physical or health status may have changed during the spring 2020 school closure. The family may or</p>

	<p>may not have had access to physicians, therapies, and medications to mitigate the impact of a physical or health condition during the closure. Therefore, the student may present with different challenges upon return to school. The IEP Team will need to consider revising the PLAAFP relative to these challenges and providing new or different supplementary aids/supports, goals/STOs, and/or special education programs/services in response to the new challenges.</p> <p>This difficulty with access to health care services may occur again if there are school closures during the 2020-21 school year. Therefore, ongoing monitoring of the student's physical, health and medical status will be critical to ensure that the IEP continues to be current relative to needs. IEP amendments to address changing needs may become necessary.</p> <p>Some students' physicians may indicate that the student is unable to attend school due to this underlying vulnerability, due to a case of COVID-19 in the home which requires quarantining, or due to the fact that the student is ill with COVID-19 (potentially asymptomatic). If a student can continue to access the District's virtual learning option, develop a CLP.</p> <p>If documentation is received from a physician that a student is bound to the home and unable to access education during illness to the extent they normally would, homebound services should be obtained so that a plan can be developed for delivering homebound services in the safest possible manner.</p> <p>NOTE: For more detailed information about homebound instruction please refer to the MDE homebound guidance</p>
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	<p><u>here</u>. Homebound services must be provided for at least two, nonconsecutive, 1-hour sessions per week; however, many students will require more service to receive a FAPE.</p> <p>If needs identified in this section are NOT addressed later in the IEP, an explanation must be included on the Notice of an Offer of FAPE page.</p>
<p>The IEP must document consideration of whether the student has any perceptual, motor, or mobility concerns, such as gross and fine motor coordination, balance, and limb/body mobility that impedes learning.</p>	<p>The student's perceptual/motor and mobility concerns must be considered in traditional brick and mortar settings.</p> <p>If it is identified that students have difficulty accessing traditional technology used during distance learning, IEP Teams will need to document whether any additional/different technology is required through the Contingency Learning Plan process.</p> <p>Students who require Occupational or Physical Therapy as a result of their perceptual/motor or mobility needs may have annual goals/STOs that become less feasible to address in a distance learning environment where hands-on involvement of the OT or PT would not be safe or reasonable. The Contingency Learning Plan will be a helpful tool in identifying how services will be modified when a distance learning model must be implemented due to a school closure.</p> <p>If needs identified in this section are NOT addressed later in the IEP, an explanation must be included on the Notice of an Offer of FAPE page.</p>

Special Factors/Supplementary Aids



Key Concepts that will be discussed in this section include:

- ❖ **The student may require different supplementary aids/services in a distance learning environment as compared to a traditional, brick-and-mortar environment. A Contingency Learning Plan will be used to modify the manner in which a supplementary aid/service will be delivered when the overall instructional delivery model shifts due to the public health situation, or if a parent opts for the District's virtual learning model.**
- ❖ **Distance learning may suggest that new/different supplementary aids/services would be appropriate.**
- ❖ **Technology for distance learning and use of personal protective equipment may be new, pandemic-related issues that require a Contingency Learning Plan.**

§300.320 of the Individuals with Disabilities Education Act (IDEA) defines an individualized education program. The IEP must include a statement of supplementary aids and services, based on peer-reviewed research to the extent practicable, to be provided to the child, or on behalf of the child, and a statement of the program modifications or supports for school personnel that will be provided to enable the child to advance appropriately toward attaining the annual goals; to be involved in and make progress in the general education curriculum, and to participate in extracurricular and other nonacademic activities; and to be educated and participate with other children with disabilities and nondisabled children.

The following chart describes additional considerations that may be necessary when identifying the supplementary aids and services (supports) that a student may require in a distance learning environment.

Requirements of IDEA/MARSE	Additional Considerations as a Result of COVID-19
<p>The IEP must identify the supplementary aids/supports (SAS) that the student requires in order to:</p> <ul style="list-style-type: none"> • Be involved and progress in the general curriculum. • Be educated with other students with or without disabilities. • Progress toward IEP goals/objectives. • Participate in extracurricular and nonacademic activities. <p>Use of SAS should be documented by both special education and general education providers.</p> <p>Make a copy of this Accommodations Log for personal use.</p>	<p>In a distance learning environment, involvement in the general curriculum and participation with other students may occur in synchronous or asynchronous, online situations. Similarly, instruction in IEP goals/objectives will need to occur in an online or distance learning format. Extracurricular and nonacademic activities may be modified due to the distance learning situation. If any of these sections require a modification in delivery, a Contingency Learning Plan will be needed.</p> <p>If SAS are reduced/changed/eliminated, an explanation must be included on the Notice of an Offer of FAPE page.</p>
<p>SAS include supports, accommodations and/or modifications that will be provided to the student, and/or on behalf of the student.</p> <p>SAS also may include program modifications or supports provided to school staff.</p>	<p>In order to participate with peers, personal protective equipment (PPE) may be required in the school setting. It will be important to consider how any health/safety requirements relative to COVID-19 and PPE may impact the student and perhaps drive the need for some additional, student-specific SAS such as:</p> <ul style="list-style-type: none"> • Social stories or training relative to use of personal protective equipment. • Active teaching of hygiene practices. • Additional emotional support to address issues of anxiety related to safety measures. <p>SAS provided "on behalf of the student" may include supports provided to the parent during the distance learning situation and should be documented in a CLP.</p>

	<p>Some examples include:</p> <ul style="list-style-type: none"> • Consultation to the parent or caregiver to implement a positive behavior support plan in the home. • Training for the parent in strategies to increase on-task behavior during virtual learning. • Any other consultation/support that the parent or caregiver may need to effectively facilitate distance learning experiences. <p>SAS provided as a “program modification” typically make a change in the structure or method of delivery of instruction. If program modifications are a result of distance learning, document in a CLP.</p> <p>Some examples include:</p> <ul style="list-style-type: none"> • Adjustments to the timing/frequency of instruction that is provided for all students (i.e., providing more or less in-person instructional time, based on the disability-related needs of the student.) • Provision of technology (including assistive technology or alternate types of technology) that may be necessary for the student to access distance learning. • Any other “tweaks” to the overall distance learning model which may be appropriate for the student based on disability-related needs. <p>SAS provided as a “support for school personnel” include training, instruction or information provided to teachers, administrators, and other staff so that they are better prepared to address the needs of the student. If support for</p>
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	<p>school personnel is a direct result of distance learning, document in a CLP.</p> <p>Some examples include:</p> <ul style="list-style-type: none"> • Training for the teacher in how to incorporate the use of assistive technology in distance learning experiences. • Reviewing the behavior support plan with the teacher so that he can implement it effectively during online class meetings. • Any other information/support that teachers or other staff may need to effectively work with the student and implement specially designed instruction in a distance learning model.
<p>SAS must include a description of the specific aid, support, accommodation, or modification that will be provided.</p> <p>The description must be sufficiently specific to assure that any service provider could implement the supplementary aid in the manner intended by the IEP Team.</p>	<p>The IEP Team will need to consider the supplementary aids that are necessary in the traditional classroom setting. Any SAS which may be necessary as a result of distance learning should be addressed in a CLP. This consideration should be informed by observations of the student and data gathered during distance learning opportunities in the spring of 2020.</p> <p>Specific language is necessary to adequately describe the specific SAS that will be provided.</p> <p>This should be done through the Contingency Learning Plan.</p>
<p>SAS must include the frequency and duration for providing the aid or support.</p> <p>If frequency/duration are not easily quantified, the IEP may describe the specific circumstances under which the aid or support will be provided.</p> <p>Terms like "as needed" or "per teacher request" are not sufficient to describe</p>	<p>If a SAS applies only in a brick-and-mortar situation, this should be specified as part of the conditions under which the SAS will be provided.</p> <p>If a SAS is unique to the distance learning environment, this should be specified as part of the CLP.</p>

the frequency with which a supplementary aid will be provided.	
SAS must include the location where the aid or support will be provided. Location typically refers to specific general education and/or special education classes or settings and not to a building.	<p>If the district is providing a distance learning model for all students, it will be important to remember that the location of a SAS may be something other than a typical classroom. Document the location in the CLP. A distance learning "location" might be something like:</p> <ul style="list-style-type: none"> • In a general education class zoom meeting. • In a special education Google Classroom. • In synchronous or asynchronous, online speech or social work sessions. • At home when completing independent practice work.

In the event of school closure or interruption of services that results in out of school instruction due to: a) the district being placed in Phase 1, 2, or 3 by Executive Order or by community decision, b) the district selecting a remote form of instruction in Phases 4, 5 and 6, c) a parent chooses to keep a student home due to health and safety, d) student illness due to COVID-19 (may trigger [homebound services](#)) or a household member quarantined due to exposure to COVID-19, this plan will be implemented to address the IEP for the length of time the student is unable to participate in brick and mortar school instruction.

It is important to note that the Contingency Learning Plan does not take the place of the District's offer of FAPE during regularly scheduled/in school instruction days. This plan will provide the student with the district offer of FAPE during out of school instruction. This plan will be discussed and made a part of the IEP as a Supplementary Aid and Service. Please understand that the Contingency Learning Plan may need to be implemented multiple times throughout the school year and can be modified without a formal IEP meeting or IEP Amendment, as needed, with parent input.

Measurable Annual Goals and Short-Term Objectives



Key Concepts that will be discussed in this section include:

- ❖ **Measurable annual goals/STOs must be taught, progress monitored, and measured in both traditional, brick-and-mortar environments as well as distance learning environments.**
- ❖ **To the extent appropriate, annual goals/STOs may be written in language that transcends settings.**
- ❖ **A Contingency Learning Plan may be used to modify the way an annual goal/STO will be taught, progress monitored, and measured when there is a shift to a different instructional delivery model due to the public health situation.**

§300.320 of the Individuals with Disabilities Education Act (IDEA) defines an individualized education program. The IEP must include a statement of measurable annual goals, including academic and functional goals designed to meet the child's needs that result from the child's disability to enable the child to be involved in and make progress in the general education curriculum; and meet each of the child's other educational needs that result from the child's disability. For children with disabilities who take alternate assessments aligned to alternate achievement standards, the IEP must include a description of benchmarks or short-term objectives. The IEP must include a description of how the child's progress toward meeting the annual goals will be measured, and when periodic reports on the progress the child is making toward meeting the annual goals (such as through the use of quarterly or other periodic reports, concurrent with the issuance of report cards) will be provided.

R 340.1721e of the Michigan Administrative Rules for Special Education (MARSE) requires that the IEP include a statement of measurable annual goals, including measurable short-term objectives.

Guidance from MDE/OSE dated August of 2019 identifies four components for measurability of annual goals, including a current level of performance, a specific skill or set of skills to be taught and measured, a target or outcome, and a method of measurement. These components are to be determined through a complete review of the individualized education program (IEP). Guidance from MDE/OSE relative to measurable annual goals can be found [here](#).

MDE/OSE also has indicated through monitoring/complaint findings and related guidance that the IEP must include baseline data for each annual goal expressed in the same terms as the criteria for the measurable annual goal/STO.

The following chart describes special considerations that will be necessary when developing IEP annual goals/STOs that potentially will be implemented across settings/environments (i.e., both in-person and virtually.)

Requirements of IDEA/MARSE	Additional Considerations as a Result of COVID-19
<p>The development of any measurable annual goal begins with a review the student's PLAAFP (Present Level of Academic Achievement and Functional Performance), including the PLAAFP page of the PowerSchool Special Education IEP, the student summary page, the special factors section of the IEP, as well as any baseline data included on the goal page. All these sections together comprise the total PLAAFP.</p> <p>The IEP Team must determine which needs from the total PLAAFP will be addressed by a supplementary aid or support, which needs will be addressed by a measurable annual goal or short-term objective, and which needs will be addressed by a program or service. If it is determined that a specific need will not be addressed, this decision must be documented on the "Notice of an Offer of a FAPE" page in the section labeled "options considered and not selected."</p>	<p>The PLAAFP tells the story of the student's progress over the past year (since the last IEP) up to the present. The spring 2020 school closure is an important part of that story for each student. When developing the PLAAFP, the IEP Team must consider not just the student's performance in a typical classroom setting, but also in a virtual setting.</p> <p>Needs identified in the PLAAFP may be different across settings (brick-and-mortar vs. virtual.) Identified needs in all settings must be addressed later in the IEP.</p> <p>If a need it identified but not addressed, an explanation must be included on the Prior Written Notice page (<i>options considered and not selected.</i>)</p>
<p>For needs that will be addressed by annual goals/short-term objectives, develop at least one annual goal and at least two short-term objectives related to each annual goal.</p> <p>Short-term objectives (STOs) may be related to the annual goal in one of the following ways:</p> <ul style="list-style-type: none"> The STOs may benchmark the level of proficiency leading to the 	<p>This requirement still applies to the development of annual goals/STOs in distance learning model.</p>

<p>annual goal. In this model, all the STOs would address the same skill, but with increasing criteria or complexity over the course of the year.</p> <ul style="list-style-type: none"> The STOs may address subskills which are components of the overarching skill in the annual goal. These different subskills could be either sequential or non-sequential in nature, but collectively would contribute to the attainment of the annual goal. 	
<p>To be measurable, an annual goal or short-term objective must include all the following components:</p> <ul style="list-style-type: none"> The student's current level of performance. <ul style="list-style-type: none"> The current level of performance may include descriptive and/or quantifiable information. Any scores that are reported should be explained. The current level of performance must include baseline data which serves as the student's starting point for instruction relative to academic or functional performance. This baseline data must be expressed in the same terms as the criteria for the annual goal. The specific skill or set of skills to be taught and measured. <ul style="list-style-type: none"> The skill or set of skills is the expected academic or functional performance to be taught to produce a measurable outcome. When identifying a "set of skills" to be taught and measured, short-term 	<p>Once the IEP Team determines that a need will be addressed by an annual goal/STO, the IEP must include baseline data regarding how the student currently performs the skill that will be the target of the goal/STO. The baseline data must be expressed in the same terms as the criteria for the annual goal.</p> <p>When developing measurable annual goals/STOs that will be learned in a distance learning delivery model, the IEP Team will need to consider how the delivery model may impact demonstration of the target skill and monitoring of progress over time. During the spring 2020 school closure, some grace was granted for situations where goals could not be implemented, or progress could not be monitored, exactly as written. No such flexibility is anticipated for the 2020-21 school year.</p> <p>To the extent appropriate for the student, IEP Teams are encouraged (but not required) to develop annual goals/STOs that can be taught/measured across both brick-and-mortar and distance learning environments. This will help ensure that instruction and progress can continue</p>

<p>objectives which identify the specific subskills to be taught must be included.</p> <ul style="list-style-type: none"> • Target or outcome. <ul style="list-style-type: none"> ○ The target or outcome is the level of achievement or mastery that is expected for the specific skill or set of skills that is being measured. ○ The target or outcome should be expressed in the same terms as the baseline data in the PLAAFP was reported. • A method of measurement. <ul style="list-style-type: none"> ○ The method of measurement is a description of how the student's progress toward meeting the goal or objective is to be determined. 	<p>seamlessly when schools close and the student needs to move to a Contingency Learning Plan. To the extent possible, selecting methods of measurement which can be utilized across both brick-and-mortar and virtual settings (as may become necessary based on the public health situation) will help the IEP apply across settings.</p>
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In the event of school closure or interruption of services that results in out of school instruction due to: a) the district being placed in Phase 1, 2, or 3 by Executive Order or by community decision, b) the district selecting a remote form of instruction in Phases 4, 5 and 6, c) a parent chooses to keep a student home due to health and safety, d) student illness due to COVID-19 (may trigger [homebound services](#)) or a household member quarantined due to exposure to COVID-19, this plan will be implemented to address the IEP for the length of time the student is unable to participate in brick and mortar school instruction.

It is important to note that the Contingency Learning Plan does not take the place of the District's offer of FAPE during regularly scheduled/in school instruction days. This plan will provide the student with the district offer of FAPE during out of school instruction. This plan will be discussed and made a part of the IEP as a Supplementary Aid and Service. Please understand that the Contingency Learning Plan may need to be implemented multiple times throughout the school year and can be modified without a formal IEP meeting or IEP Amendment, as needed, with parent input.

Programs and Services in the Least Restrictive Environment



Key Concepts that will be discussed in this section include:

- ❖ **The District's MI Safe Schools Roadmap Preparedness Plan describes how the general curriculum will be delivered to all students in 2020-21; IEPs are developed within that framework.**
- ❖ **A Contingency Learning Plan may be used to modify the way a program(s)/service(s) will be delivered when there is a shift to a different instructional delivery model due to the public health situation.**
- ❖ **The IEP team must ensure that programs/services during a school closure or distance learning are delivered in the least restrictive environment (i.e., with nondisabled peers to the maximum extent appropriate.)**

§300.114 of IDEA requires each district to ensure that:

- To the maximum extent appropriate, children with disabilities, including children in public or private institutions or other care facilities, are educated with children who are nondisabled.
- Special classes, separate schooling, or other removal of children with disabilities from the regular educational environment occurs only if the nature or severity of the disability is such that education in regular classes with the use of supplementary aids and services cannot be achieved satisfactorily.

Further, **§300.116** requires that, in selecting the least restrictive environment, consideration be given to any potential harmful effect on the child or on the quality of services that s/he needs. A child with a disability is not to be removed from education in age-appropriate regular classrooms solely because of needed modifications in the general education curriculum.

§300.116 of IDEA requires that districts ensure that the placement decision for a student with a disability:

- Is made by a group of persons, including the parents, and other persons knowledgeable about the child, the meaning of the evaluation data, and the placement options.
- Is made in conformity with the least restrictive environment (LRE) provisions of IDEA.
- Is determined at least annually.

- Is based on the child's IEP.
- Is as close as possible to the child's home.
- Is in the school that s/he would attend if nondisabled unless the IEP requires some other arrangement.

§300.320 indicates that the IEP must include a statement of the special education and related services to be provided to the child. The IEP must include the projected date for the beginning of the programs/services and the anticipated frequency, location, and duration of those programs/services.

The IEP also must include an explanation of the extent, if any, to which the child will not participate with nondisabled children in the regular class and in age-appropriate activities.

The MI Safe Schools Roadmap provides a framework for delivering instruction to all students. The District's Preparedness Plan describes how the general curriculum will be delivered to all students in 2020-21, and IEPs are developed within that framework. It is anticipated that districts in southeast Michigan will not open at anything higher than a Phase 4 for the fall of 2020. Therefore, it's reasonable to anticipate that most IEPs will be developed under the District's Phase 4 Plan (i.e., assuming in-person instruction.)

When school closes and a distance learning model is implemented for all students, the "general education setting" takes on a new connotation. Students with IEPs must be included in the activities provided to all students in the school/grade/class to the maximum extent appropriate. This includes participation in the distance learning activities that are made available to all students during a school closure. This may require new/additional supplementary aids/supports as described in an earlier section of this document. If the IEP Team determines that a student is to be removed from the general education setting (i.e., the distance learning experience that is provided to all students) the PLAAFP must provide data which creates a foundation for this decision.

The following chart describes special considerations that may be necessary when identifying the special education programs and related services that a student may require in a distance learning situation.

Requirements of IDEA/MARSE	Additional Considerations as a Result of COVID-19
The IEP Team develops the statement(s) regarding the student's present level of academic achievement and functional performance. The PLAAFP must include a statement regarding how the student's disability impacts involvement and progress in	In considering how the student's disability impacts involvement and progress in the general curriculum, the IEP Team must consider not just the traditional, brick-and-mortar school experience, but also the student's involvement and progress in the

<p>the general curriculum, including participation with non-disabled peers in the regular classroom. For preschoolers, this may include a statement regarding how the disability impacts involvement in age-appropriate activities.</p> <p>After completing the statement(s) about the student's current level of functioning and impact of the disability on participation/progress in the general curriculum, the IEP Team uses the statement(s) to drive the rest of the IEP.</p>	<p>general curriculum when provided under a distance learning model established for all students. It is only by understanding how the student participates and progresses in distance learning experiences that the IEP Team can make a well-reasoned decision about what supports the student requires in the CLP, should one be necessary.</p> <p>Observations and data gathered during the spring 2020 school closure will be critical to informing this consideration.</p>
<p>When determining the programs and services that are necessary to address the student's unique needs, the IEP Team shall:</p> <ul style="list-style-type: none"> • First consider whether a satisfactory education can be achieved in a setting with nondisabled peers through the implementation of supplementary aids/supports in the regular classroom. This may include accommodations or modifications to the general curriculum or instructional activities, as well as additional supports such as co-teaching and in-class delivery models for related services. • Ensure that the student is removed from the regular classroom only to the extent necessary to provide a free, appropriate, public education. • Base the identification of programs/services on peer-reviewed research to the extent practicable. • Consider any potential harmful effect on the student or on the quality of services that s/he needs. • For students age 15 and above (or younger, if appropriate) ensure that the IEP includes transition services/activities to support the 	<p>All students with disabilities must be afforded equal access to the learning experiences that are provided for all students, including experiences provided under a distance learning model that may be implemented as a result of the public health situation. The default presumption is that every student with an IEP will participate in the same opportunities that are provided for all students of the same age/grade, including any online/distance learning that is offered for all students.</p> <p>The IEP Team must consider what supplementary aids/supports would be necessary for the student to participate with nondisabled peers in the learning opportunities provided to all students.</p> <p>If all students are participating in a distance learning model adopted by the district, then a CLP will be needed, and the following are considerations:</p> <p>*Consider the technology that may be necessary to facilitate equal access for the student with an IEP. Consider other supports such as virtual coteaching, virtual "push in" services, and virtual paraprofessional support.</p>

<p>student in attaining his/her postsecondary goals.</p> <ul style="list-style-type: none"> • Ensure that all programs/services are provided at no cost to the parent/family. • Ensure that the placement is as close as possible to the student's home. • Ensure that the placement is in the school that the student would attend if s/he were not disabled unless the IEP requires some other arrangement. • Document on the programs/services page and the supplementary aids/supports section of the IEP all the programs/services that are determined necessary to meet the student's unique needs. This documentation must include the frequency, duration, and location of each program/service or supplementary aid. • Document in the notice of an offer of FAPE any programs/services that were considered by the IEP Team and not selected, as well as the basis for that decision. 	<p>A student with an IEP may be removed from the distance learning experience provided to all students only to the extent necessary to provide a FAPE.</p> <p>The IEP also must specify the special education programs/services that will be provided to the student to support involvement and progress in the general curriculum.</p> <p>Should the student require distance learning, the same consideration will be needed through the CLP, including any distance learning opportunities provided to all students.</p> <p>The IEP typically identifies the programs/services that will be provided when school is open for in-person instruction. A CLP should be incorporated into the IEP to identify how programs/services will be modified during a school closure related to the public health situation.</p> <p>When specifying the programs/services that will be delivered, the frequency, duration, and location generally should align with the District's approved plan under the MI Safe Schools Roadmap. However, it also is possible to make individualized considerations regarding the frequency, duration, and location of programs/services based on unique, disability-related needs. This may include individualized provisions relative to the ratio of in-person versus online learning time. All such decisions should be based on data and must relate directly to the needs identified in the PLAAFP. The IEP must include a clear rationale for such decisions.</p> <p>A CLP for an emergency closure must be developed by the IEP Team and incorporated into the IEP by reference</p>
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	<p>and by attachment (similar to the manner in which a positive behavior support plan or health plan is incorporated into an IEP.)</p> <p>The CLP will be referenced in the "Special Factors" section of the IEP.</p>
<p>When determining the programs and services that are necessary to address the student's unique needs, the team shall NOT:</p> <ul style="list-style-type: none"> • Remove a student from the regular classroom solely because of needed modifications to the general education curriculum. • Be restricted to considering programs and services that are currently available within the district or the ISD. 	<p>A student with an IEP may not be removed from learning opportunities provided to all students solely because the student requires curriculum modifications. The IEP must clearly articulate (typically in the PLAAFP section) a foundation for any decision to remove the student from the regular classroom. If a student is participating in remote learning, the CLP must articulate any changes to involvement in regular classroom experiences that are delivered virtually.</p>

In the event of school closure or interruption of services that results in out of school instruction due to: a) the district being placed in Phase 1, 2, or 3 by Executive Order or by community decision, b) the district selecting a remote form of instruction in Phases 4, 5 and 6, c) a parent chooses to keep a student home due to health and safety, d) student illness due to COVID-19 (may trigger [homebound services](#)) or a household member quarantined due to exposure to COVID-19, this plan will be implemented to address the IEP for the length of time the student is unable to participate in brick and mortar school instruction.

It is important to note that the Contingency Learning Plan does not take the place of the District's offer of FAPE during regularly scheduled/in school instruction days. This plan will provide the student with the district offer of FAPE during out of school instruction. This plan will be discussed and made a part of the IEP as a Supplementary Aid and Service. Please understand that the Contingency Learning Plan may need to be implemented multiple times throughout the school year and can be modified without a formal IEP meeting or IEP Amendment, as needed, with parent input.

Transportation Considerations



Key Concepts that will be discussed in this section include:

- ❖ **During the pandemic, heightened transportation considerations may be necessary for students with underlying health/medical issues.**

Special transportation is a related service under IDEA. The IEP must consider the need for specialized transportation at each IEP meeting. The following chart describes heightened considerations that may be necessary when identifying the special education transportation provisions that a student may require.

Requirements of IDEA/MARSE	Additional Considerations as a Result of COVID-19
The IEP must identify programs and related services which will be provided to the student. Transportation is one of these services.	<p>Students with underlying health conditions may require additional considerations for transportation, including social distancing, use of personal protective equipment (PPE) by the student and/or transportation staff, or additional disinfecting/sanitizing protocols. The IEP Team will need to consider these factors when determining specialized transportation needs.</p> <p>Specific accommodations/supports for transportation must be documented in the IEP, typically in the comments box in the Transportation section of the IEP or in the Supplementary Aids/Supports section of the IEP.</p> <p>A CLP will need to address special transportation during distance learning.</p> <p>If needs are identified relative to transportation but not addressed in the IEP, an explanation must be included on the Notice of an Offer of FAPE page.</p>

Extended School Year Considerations



Key Concepts that will be discussed in this section include:

- ❖ **The need for extended school year services must be considered proactively for each student on an annual basis.**
- ❖ **Progress monitoring data from before, during, and after the spring 2020 school closure will help inform ESY considerations because it illustrates how a student is impacted by an extended interruption in learning.**
- ❖ **Extended school year is not provided as a remedy for learning opportunities that were missed during the school closure in the spring of 2020.**

Extended School Year means services beyond the duration of the typical school year for all students. Some students with disabilities will require an extended school year if progress toward one or more annual goals is jeopardized by a break in instruction. The progress in jeopardy must relate to one of three standards for ESY that have been identified by MDE, which are as follows:

- 1) A serious potential for regression of skills beyond a reasonable period of recoupment;
- 2) The nature or severity of the disability; or
- 3) Critical stages or areas of learning.

For more information about Michigan's Standards for Extended School Year go to: https://www.michigan.gov/documents/mde/GuidanceDocforESY_245915_7.pdf

Typically, "breaks in instruction" are considered to be summer, the holiday break, spring break, etc. However, during the COVID 19 emergency school closure in the spring of 2020, nearly all students experienced a break in instruction to a greater or lesser degree as schools geared up to provide distance learning under a Continuity of Learning Plan. Progress monitoring data from before, during, and after the spring 2020 school closure will help inform ESY considerations.

Extended School Year is a *prospective analysis* designed to anticipate and prevent any potential loss of progress due to a scheduled break in instruction. As such, ESY should not be confused with additional services or supports designed retrospectively to help a student recover from the spring 2020 school closure. Districts are encouraged to use [this worksheet](#) to document appropriately individualized ESY considerations and decision-making.

Participation in Districtwide and Statewide Assessments



Key Concepts that will be discussed in this section include:

- ❖ **The IEP team must identify how the student will participate in districtwide and statewide assessments.**
- ❖ **As of the writing of this document, there is no indication that statewide assessments will be waived during the 2020-21 school year.**

§ 300.320 a (6)(i) of IDEA requires that each IEP include a statement of any individual appropriate accommodations that are necessary to measure the academic achievement and functional performance of the child on State and districtwide assessments. If the IEP Team determines that the child must take an alternate assessment instead of a particular regular State or districtwide assessment of student achievement, the IEP must include a statement of why the child cannot participate in the regular assessment as well as the particular alternate assessment selected is appropriate for the child.

The following chart describes considerations that may be necessary when determining how the student will participate in districtwide and statewide assessments during the 2020-21 school year.

Requirements of IDEA/MARSE	Additional Considerations as a Result of COVID-19
The IEP must describe how the student will participate in both districtwide and statewide assessments, including any accommodations that may be necessary for participation.	<p>To date there has been no guidance from the US Department of Education, OSEP, or MDE/OSE regarding state assessments for the 2020-21 school year. Although MDE/OSE has requested that statewide assessments be waived for 2020-21, the US Department of Education has not yet acted on this request. Therefore, IEP Teams should assume that statewide assessments will remain in place for 2020-21 and plan accordingly.</p> <p>Districtwide assessments are often a direct response to mandates from the state or federal government. To date,</p>

	<p>no flexibility has been granted for waiving mandated, districtwide assessments. Therefore, IEP Teams should assume that most mandated, districtwide assessments will remain in place for 2020-21 and plan accordingly.</p> <p>Some districts conduct additional, non-mandated districtwide assessments at certain grade levels to gauge student performance relative to curriculum standards. Additionally, in the fall of 2020, many districts will be implementing some type of assessment to measure learning loss and recoupment of skills due to the spring 2020 school closures. If these locally determined, districtwide assessments are new/different than tools that have been used in the past, IEP Teams may need to amend IEPs to address how students will participate in these new/different skill assessments.</p> <p>NOTE: <i>Parental consent is required for any individual evaluations that may be conducted for the student (i.e., evaluations/assessments that are not conducted for the general population.)</i></p> <p>§ 300.302 of IDEA indicates that "screening for instructional purposes" is not evaluation. The screening of a student by a teacher or specialist to determine appropriate instructional strategies for curriculum implementation shall not be considered to be an evaluation for eligibility for special education and related services (which would require consent.)</p> <p>If there are considerations around assessment participation which are not included in the IEP, an explanation must be included on the Notice of an Offer of FAPE page.</p>
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Postsecondary Transition



Key Concepts that will be discussed in this section include:

- ❖ **The IEP team should consider how the student's engagement and progress during distance learning impacts the earning of credit toward a diploma, as well as meaningful involvement in activities leading to a certificate of completion.**
- ❖ **A Contingency Learning Plan may be used to modify how transition services/activities, including community-based instruction and worksite-based learning, will be modified in response to the public health situation.**
- ❖ **If the public health situation creates concerns relative to transfer of rights at age of majority, districts are encouraged to seek guidance from district legal counsel.**

§300.320 of IDEA defines the content of an IEP, including a requirement that, not later than the first IEP to be in effect when the child turns 16, or younger if determined appropriate by the IEP Team, and updated annually, thereafter, the IEP must include all the following:

- Appropriate measurable postsecondary goals based upon age appropriate transition assessments related to training, education, employment, and, where appropriate, independent living skills.
- The transition services (including courses of study) needed to assist the child in reaching those goals.

§300.43 of IDEA defines transition services as a coordinated set of activities for a child with a disability that is:

- Designed to be within a results-oriented process.
- Focused on improving the academic and functional achievement of the child with a disability to facilitate the child's movement from school to post-school activities, including postsecondary education, vocational education, integrated employment (including supported employment), continuing and adult education, adult services, independent living, or community participation.
- Is based on the individual child's needs, taking into account the child's strengths, preferences, and interests.

§300.43 goes on to say that the term transition services includes:

- Instruction.
- Related services.
- Community experiences.

- The development of employment and other post-school adult living objectives.
- If appropriate, acquisition of daily living skills and provision of a functional vocational evaluation.

Transition services for children with disabilities may be special education, if provided as specially designed instruction, or a related service, if required to assist a child with a disability to benefit from special education.

A Contingency Learning Plan may be used to modify how transition services/activities will be provided in response to the public health situation.

The purpose of the Post-Secondary Transition section of the PSSE IEP form is to document consideration of the student's strengths and areas of need to help the student plan and prepare for adult life. The following chart describes special considerations that will be necessary when developing transition services and activities in a distance learning context.

Requirements of IDEA/MARSE	Additional Considerations as a Result of COVID-19
If a purpose of the IEP meeting is the consideration of postsecondary goals for the student and the transition services needed to assist the student in reaching those goals, the school district must invite the student to the IEP meeting. If the student does not attend the IEP team meeting, the school district must take other steps to ensure that the student's preferences and interests are considered.	This requirement still applies during distance learning. The student may participate by virtual means (phone, Zoom, Skype, etc.) Districts must ensure that the student has meaningful access to the virtual platform being used.
If a purpose of the IEP meeting is the consideration of postsecondary goals for the student and the transition services needed to assist the student in reaching those goals, the school district must invite a representative of any participating community agency that is likely to be responsible for providing or paying for transition services. The following considerations apply to inviting a community transition agency representative: <ul style="list-style-type: none"> • The school must obtain written parental consent (or student consent if he or she has reached age of majority, which in 	This requirement still applies. The agency representative may participate by virtual means. The logistics of advance consent to invite an agency may be more difficult if schools are closed. Planning will be necessary to ensure that appropriate, written consent is obtained, and invitations are issued in a timely manner.

<p>Michigan is 18) before a community agency representative can be invited to an IEP Team meeting.</p> <ul style="list-style-type: none"> • The consent for an agency representative to be invited to an IEP Team meeting is valid for up to one year from the date of consent or until the first IEP Team meeting at which transition services are discussed, whichever comes first. • The date of consent may not be after the date of the invitation. • The meeting invitation must indicate the time, purpose, and location of the meeting. 	
<p>Transition assessment(s) must be completed prior to the first IEP meeting where transition services will be discussed. The transition assessment helps to create a foundation for the student's postsecondary vision (goals). The following considerations apply to transition assessments:</p> <ul style="list-style-type: none"> • Transition assessments are required in the following areas: <ul style="list-style-type: none"> • Education • Training • Employment • Independent living skills, where appropriate • Transition assessment results must be documented in the IEP, in the Transition section of the PLAAFP page and/or on the Transition page of the IEP. This documentation should include <ul style="list-style-type: none"> • date of the assessment • name of the assessment, • scores obtained on the assessment with an explanation/interpretation of their meaning. 	<p>The requirement for transition assessments still applies during distance learning and implementation should not be impacted.</p> <p>If a transition assessment is administered in a modified format due to a school closure, that should be explained/documented in a CLP along with the interpretation of assessment scores.</p> <p>If a transition assessment can only be administered in an in-person format, that assessment may prove to be unfeasible during a school closure. An alternate transition assessment may need to be explored, as decisions about transition services and activities still must be based on an age-appropriate assessment. A CLP may be needed.</p>

<p>In the transition planning process, the IEP Team must consider the student's needs, taking into account the student's strengths, preferences, and interests. This includes formal and informal tests, interest inventories, or written documents containing a discussion/interview with the student. This must be documented in the IEP by:</p> <ul style="list-style-type: none"> • Documentation that the student attended and participated in the IEP Team meeting, or • Statement(s) within the IEP regarding how the student's strengths, preferences, and interests were considered if he or she was not in attendance. 	<p>This requirement still applies when schools are closed or when distance learning is taking place. Implementation should not be impacted.</p> <p>Student input may be obtained by phone, email, written questionnaire, or other virtual/distance strategies and documented by a special education provider.</p> <p>It also is possible for a service provider or parent to share the student's interests/preferences as obtained through first-hand conversations with the student.</p> <p>If the student's identified need or preference is not incorporated into the IEP, an explanation must be included on the Notice of an Offer of FAPE page.</p>
<p>The IEP must include a statement of the student's measurable postsecondary goals in the areas of Education, Training, and Employment. A measurable postsecondary goal for Independent Living Skills is required only if the IEP team determines it is necessary to meet the needs of the student. These measurable postsecondary goals must be documented in the Transition section of the IEP. The following considerations apply to measurable postsecondary goals:</p> <ul style="list-style-type: none"> • The postsecondary goal must be written in terms of what will occur after the student completes high school or secondary program. • "Measurable" means that the goal can be counted or measured. Some possible verbs that meet this requirement are "will" or "is going to". 	<p>This requirement continues to apply when school is closed or during distance learning.</p> <p>Because the postsecondary goals focus on what the student will do in the future (i.e., after leaving the school setting) it is unlikely that the postsecondary goals would need to change during a school closure or distance learning.</p>

<ul style="list-style-type: none"> • There is no requirement to measure the progress or acquisition of the postsecondary goals once a student has graduated or completes school. • Postsecondary goals must be updated and documented annually at the time of the IEP. • Best practice suggests that if the postsecondary goals from the previous year's IEP have not changed, a statement that postsecondary goals continue to be current and appropriate should be included. 	
<p>The IEP must identify the transition services that will reasonably enable the student to meet his/her postsecondary goals. The following considerations apply:</p> <ul style="list-style-type: none"> • Transition services must be individualized, based identified areas of need. • Transition services must be a coordinated set of activities that will occur during the current IEP year, as well as long-range. • Each transition area must be considered when planning the transition services. However, there is no requirement to include a service or activity for every transition area. • The transition services must be related to and in support of the student's measurable post-secondary goals so that the student is actively working towards the attainment of his/her postsecondary goals. • Transition services must be documented on the Transition page of the IEP. 	<p>This requirement continues to apply during a school closure when distance learning is in effect. In developing appropriate transition services and activities, the IEP will need to consider not just the transition activities or services that are necessary in the traditional classroom or community-based setting, but also those transition services/activities that could be accessed during distance learning. If distance learning is the reality, utilize the CLP.</p> <p>This consideration should be informed by observations of the student and data gathered during distance learning opportunities in the spring of 2020.</p> <p>To the extent appropriate, the IEP Team might consider transition services/activities that are not setting-specific, that is, activities that could occur in the classroom, in the community and/or at home as the public health situation dictates, such as sorting laundry, making phone appointments, researching salaries for certain careers, etc.</p>

<p>Transition services may include one or more of the following:</p> <ul style="list-style-type: none"> • Instruction: Teaching specific skills in both formal and informal educational settings and in the community. • Related Services: Supports needed for students to access more integrated work, education, and living environments. Related services, within the context of transition services, are to help students (and families) determine if related services are needed beyond high school, help identify who or what agency might provide those services, help identify how the student (parent) can access those services and make the connections to needed services prior to the student leaving school. • Community Experience: Includes participation in community work experiences; recreation/leisure activities; residential and community engagement activities; volunteering and training in accessing community settings; or joining a team, club, or organization. • Development of Employment: Includes job seeking skills, career exploration, skill training and actual employment opportunities. Volunteer work also provides important skills and experiences that could lead to integrated employment. • Other Post-School Adult-Living Objectives: Includes services that support activities such as access to 	<p>If a transition service/activity can only be delivered in an in-person situation, this should be specified as a condition under which the transition service or activity will be provided. For example, if a transition activity is to visit a community college, this might not be able to occur safely during a school closure.</p> <p>If a transition service or activity is unique to the distance learning environment, this should be specified as a condition under which the transition service/activity is provided. For example, perhaps the IEP would specify that when school is closed, the student will explore careers using the Career Cruising website rather than on-site visits.</p> <p>The CLP will be used when identifying how transition services or activities will be modified during a school closure</p> <p>If a transition need is identified in this section and not addressed, an explanation must be included on the Notice of an Offer of FAPE page.</p>
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<p>employment support agencies, establishing a bank account, registering to vote, filing taxes, renting a home, accessing medical services, filing for insurance, or accessing adult services, college information, or Social Security Income (SSI).</p> <ul style="list-style-type: none"> • Acquisition of Daily Living Skills (when appropriate): Creating opportunities at school and in the community to learn skills to live independently or with support(s). These skills may include housekeeping, medication, self-management, transportation and mobility, self-advocacy and self-awareness, and others associated with being an active community member. • Functional Vocational Evaluation: An in-depth look at the career and vocational interests and skills of a student with disabilities within the context of authentic work experiences. This includes situational assessments or community-based assessments in the setting where the actual skills and/or job are performed. The evaluation provides specific data regarding general work behaviors across a variety of job sites. 	
<p>The IEP must identify the courses of study that will reasonably enable the student to meet his or her postsecondary goals. The following considerations apply:</p> <ul style="list-style-type: none"> • The course of study is a multi-year description of coursework from the student's current year to their anticipated exit year. 	<p>This requirement continues to apply when school is closed or during distance learning.</p> <p>The student's desired terminating credential (diploma or certificate of completion) is unlikely to change simply because of a school closure or distance learning. However, it will be important that the IEP Team consider</p>

<ul style="list-style-type: none"> • Courses of study outline the academic requirements the student needs to complete in order to accomplish his/her postsecondary goals. • Courses of study must align with the student's postsecondary goals (i.e., help the student move toward attainment of those goals.) • The course of study is not determined by the statewide assessments in which a student participates. <p>The following considerations apply when identifying and documenting the courses of study:</p> <ul style="list-style-type: none"> • The course of study must be reviewed and updated annually by the IEP Team. • The course of study must be documented in the Transition section of the IEP. • The documented course of study (Michigan Merit Curriculum or curriculum based on alternate achievement standards) must enable the student to achieve his or her postsecondary goals. • If the student is working toward a Certificate of Completion or has a Personal Curriculum, the courses must be listed on file with the district. • The course of study is documented in the Transition section of the IEP. 	<p>how the student's engagement and progress during distance learning impacts the earning of credit toward a diploma, as well as meaningful involvement in activities leading to a certificate of completion. Different supports/services may be necessary to ensure that the student continues to progress toward the desired terminating credential during distance learning.</p> <p>This consideration should be informed by observations of the student and data gathered during distance learning opportunities in the spring of 2020.</p> <p>It is important to note that case law suggests students may be eligible for compensatory education even after special education eligibility terminates based on age or earning of a regular diploma if there has been a denial of a FAPE. Therefore, it is important for the IEP Team to plan for appropriate supports/services that will allow the student to continue to receive meaningful services during any school closure in order to minimize the likelihood of a state complaint or due process complaint relative to compensatory education/denial of a FAPE.</p>
<p>Included in the transition section of the PSSE IEP Form is a place to document the student's status relative to graduation. Specifically, the IEP must document the following:</p>	<p>This requirement continues to apply during a school closure/distance learning. IEP Teams will need current data regarding if/how the spring 2020 school closure impacted the student's status in this regard.</p>

<ul style="list-style-type: none"> • Whether the student will graduate this year with a regular diploma. • Whether the student will complete age eligibility for special education services this year. 	
<p>The IEP must include at least one measurable annual IEP goal related to the student's transition services needs. This goal must be documented on the goal page of the IEP.</p>	<p>This requirement continues to apply during a school closure/distance learning.</p>
<p>When determining the programs/services that are necessary to address the student's unique needs, including the transition services that will reasonably enable the student to meet his/her postsecondary goals, the IEP Team shall:</p> <ul style="list-style-type: none"> • First consider whether a satisfactory education can be achieved in a setting with nondisabled peers through the implementation of supplementary aids/supports. This may include accommodations or modifications to the general curriculum or instructional activities, as well as supports provided to the student in a workplace or community setting with typically developing peers. • Ensure that the student is removed from the regular education environment only to the extent necessary to provide a free, appropriate, public education. For students who are involved in postsecondary transition services, the regular education environment may include settings where age peers are typically found, such as community activities or the workplace. 	<p>In general, LRE provisions apply to transition services/activities as well as special education programs and related services. Transition services/activities should be provided in settings with nondisabled peers to the extent appropriate, and students should be removed from settings with typical peers only when the transition service/activity cannot be provided in a satisfactory manner, even with the use of supplementary aids/supports. In some cases, this may mean that transition services/activities are delivered in community-based settings for post-high school aged students.</p> <p>Community placements may not be feasible or safe during a school closure due to the public health situation. IEP Teams will need to anticipate this possibility during 2020-21 and plan accordingly. Use the CLP to modify the LRE aspect of transition service delivery during a school closure or distance learning.</p> <p>If a transition service or activity is considered but not included in the IEP, an explanation should be included on the Notice of an Offer of FAPE page.</p>

<ul style="list-style-type: none"> • Base the identification of programs/services on peer-reviewed research to the extent practicable. • Consider any potential harmful effect on the student or on the quality of services that s/he needs. • Ensure that all programs and services are provided at no cost to the parent/family. • Ensure that the placement is as close as possible to the student's home. • Document on the programs and services page and in the supplementary aids/supports section of the IEP all the programs/services that are determined necessary to meet the student's unique needs. This documentation must include the frequency, duration and location of each program or service or supplementary aid. • Document in the notice of an offer of FAPE any programs or services that were considered by the IEP Team and not selected, as well as the basis for that decision. 	
<p>When determining the programs/services that are necessary to address the student's unique needs, including transition services to enable the student to meet his/her postsecondary goals, the IEP Team shall NOT:</p> <ul style="list-style-type: none"> • Remove a student from the regular classroom solely because of needed modifications to the general education curriculum. • Be restricted to considering programs or services that are 	<p>This requirement continues to apply during a school closure/distance learning.</p>

currently available within the district or the ISD.	
<p>The IEP must address the transfer of rights at the age of majority from the parent to the student. The IEP must document which of the following statement(s) is true:</p> <ul style="list-style-type: none"> • The student will be age 17 during this IEP and the student was informed of parental rights that he or she will receive at age 18. The student has turned age 18 and the student and parent were informed of parental rights that were transferred to the student at age 18, including the right to invite a support person such as a parent, advocate, or friend. • The student has turned age 18 and there is a guardian established by court order. • The student has turned age 18 and a legally designated representative has been appointed. 	<p>This requirement continues to apply during a school closure/distance learning.</p> <p>IEP Teams will need to be sensitive to the fact that the public health situation may have created barriers for families in pursuing/renewing guardianship, power of attorney, etc. Despite these barriers, rights still transfer to the student at age 18 absent action to establish other authority, even during the public health crisis. If the public health situation creates concerns relative to transfer of rights at age of majority, districts are encouraged to seek guidance from district legal counsel.</p>

Other Considerations



Key Concepts that will be discussed in this section include:

- ❖ **The Other Considerations section of the PSSE IEP form is a place to document considerations that are not addressed elsewhere in the IEP. IDEA/MARSE do not require this section of the IEP and do not specify what is to be included here**

Contingency Learning Plan

Due to the COVID-19 pandemic, schools/districts will need to be flexible in how they deliver instruction to all students during the 2020-21 school year. The MI Safe Schools Roadmap identifies six phases of schools/districts being open/closed, and it is likely that districts may move from one phase to another over the course of the school year based on orders from the Governor. Such changes may occur abruptly and with little advance warning.

Districts should plan to facilitate seamless transitions for students as schools move from one phase to another based on changes in the public health situation. This document has provided suggestions for developing an IEP to deliver a FAPE under the MI Safe Schools Roadmap, including additional considerations based on Spring 2020 mandated closures.

Additionally, an individualized Contingency Learning Plan (CLP) should be considered and may be developed by the IEP Team to describe exceptions to the delivery of special education programs and services described in the IEP. The CLP assumes that most of the IEP will be implemented as written; its focus is to describe how service delivery will deviate from the current IEP because of changes in the public health situation.

Incorporating a Contingency Learning Plan into the current IEP ensures that, as the district suddenly shifts from one MI Safe Schools phase to another due to changes in the public health situation, or as temporary school closures occur during the year, the student continues to be involved and progress in the general curriculum; continues to progress toward current IEP goals/objectives; continues to be educated with other students with and without disabilities to the extent that s/he would under the current IEP; and continues to receive the special education programs, related services, and supplementary aids/supports in the current IEP to an extent that is safe, reasonable, and practicable given the circumstances.

The following Contingency Learning Plan form guides IEP Teams through the *additional* questions that need to be addressed on an individual basis in case the instructional delivery model shifts response to changes in the public health situation. It also documents decisions that are made by the IEP Team about plans for delivering special education programs/services under a different model than what is identified in the current IEP.

Contingency Learning Plan

A Contingency Learning Plan will be incorporated into the current IEP in the Special Factors/Supplementary Aids section of the IEP.

If the district will be implementing the IEP as written, fill out the front page of the CLP and check the first box in the CLP.

- ☐ **The District is able to fully implement this Student's current IEP as it is written, with no additional special education programs, related services, supplementary aids/accommodations or supports necessary to provide**

the Student with a FAPE and equal access to the curriculum. (If this box is checked, go to the signature page of this document.)

A team representative will sign and date the document, scan and upload as a file-based attachment in PSSE. The following language will be included in the Special Factors section:

SAS: Contingency Learning Plan.

Frequency/Duration: In the event of school closure or interruption of services that results in out of school instruction due to: a) the district being placed in Phase 1, 2, or 3 by Executive Order or by community decision, b) the district selecting a remote form of instruction in Phases 4, 5 and 6, c) a parent chooses to keep a student home due to health and safety, d) student illness due to COVID-19 or a household member quarantined due to exposure to COVID-19, a Contingency Learning Plan will be developed and implemented to address the IEP for the length of time the student is unable to participate in brick and mortar school instruction. Once in school instruction resumes, the current programs and services outlined in the Individualized Education Plan will automatically resume.

Location: Out of building.

If the IEP is modified due to any of the above reasons, check the second box on page 1 and complete the CLP in its entirety.

- ☐ The district will implement the Student's IEP, with the following special education programs, related services, supplementary aids/accommodations, and supports to provide the Student with a free appropriate public education and equal access to the curriculum:

A team representative will sign and date the document, scan and upload as a file-based attachment in PSSE. The following language will be included in the Special Factors section:

SAS: Contingency Learning Plan.

Frequency/Duration: In the event of school closure or interruption of services that results in out of school instruction due to: a) the district being placed in Phase 1, 2, or 3 by Executive Order or by community decision, b) the district selecting a remote form of instruction in Phases 4, 5 and 6, c) a parent chooses to keep a student home due to health and safety, d) student illness due to COVID-19 or a household member quarantined due to exposure to COVID-19, a Contingency Learning Plan will be developed and implemented to address the IEP for the length of time the student is unable to participate in brick and mortar school instruction. Once in school instruction resumes, the current programs and services outlined in the Individualized Education Plan will automatically resume.

Location: Out of building.

Prior Written Notice



Key Concepts that will be discussed below include:

- ❖ **Prior Written Notice of the Offer of a FAPE is part of the student's "story" which began in the PLAAFP.**
- ❖ **The district must document options that were considered when developing the IEP but not included in the final IEP, as well as any other factors that were relevant to the decisions reached by the IEP team.**
- ❖ **If a Contingency Learning Plan is incorporated into the IEP by reference only (and is not attached to the IEP), the district should provide PWN of its intent to implement the Contingency Learning Plan.**

§300.503 of the Individuals with Disabilities Education Act (IDEA) describes the required content of Prior Written Notice. Notice must be given to the parents of a child with a disability a reasonable time before the school district:

- Proposes to initiate or change the identification, evaluation, or educational placement of the child or the provision of FAPE to the child; or
- Refuses to initiate or change the identification, evaluation, or educational placement of the child or the provision of FAPE to the child.

Notice must include all the following:

- A description of the action proposed or refused by the district;
- An explanation of why the district proposes or refuses to take the action;
- A description of each evaluation procedure, assessment, record, or report the district used as a basis for the proposed or refused action;
- A statement that the parents of a child with a disability have protection under the procedural safeguards of this part and, if this notice is not an initial referral for evaluation, the means by which a copy of a description of the procedural safeguards can be obtained.
- Sources for parents to contact to obtain assistance in understanding the provisions of IDEA;
- A description of other options that the IEP Team considered and the reasons why those options were rejected;
- A description of other factors that are relevant to the District's proposal or refusal.

The notice must be:

- Written in language understandable to the general public; and

- Provided in the native language of the parent or other mode of communication used by the parent, unless it is clearly not feasible to do so.

If the native language or other mode of communication of the parent is not a written language, the district must take steps to ensure that the notice is translated orally or by other means to the parent in his or her native language or other mode of communication; that the parent understands the content of the notice; and that there is written evidence that these requirements have been met.

R 340.1721b of the Michigan Administrative Rules for Special Education (MARSE) outlines additional requirements relative to the Notice of an Offer of FAPE. Specifically, MARSE indicates the following:

- Within 7 school days from the date of the individualized education program team meeting, the school district shall provide the parent with the notice of an offer of a free appropriate public education or determination of ineligibility.
- The school district shall document mode and date of delivery.
- The notice shall identify where the programs and services are to be provided and when the individualized education program begins.

The purpose of the Notice of an Offer of FAPE is to document what the district will do for the student (the contents of the IEP) and what the district will not do for the student (options considered and not selected). The following chart describes special considerations that will be necessary when developing Notice of an Offer of a FAPE.

Requirements of IDEA/MARSE	Additional Considerations as a Result of COVID-19
After completion of the IEP, the district must, within 7 school days, provide the parent with prior written notice of its intent to implement the IEP.	This requirement also applies to IEP meetings that are held virtually. A hard copy of the IEP and Notice of an Offer of a FAPE must be mailed to the parent within 7 school days of the meeting.
<p>The following requirements/steps apply to provision of Prior Written Notice of an Offer of FAPE:</p> <ul style="list-style-type: none"> • Notice must be written on the PowerSchool Special Education form of the same name. • Notice must include the actions that the district proposes to take and the reasons/basis for those actions. • The actions and the reports/data that serve as the basis for decision-making should be 	<p>This requirement also applies to IEP meetings that are held virtually.</p> <p>If a Contingency Learning Plan is incorporated into the IEP by reference only (and is not attached to the IEP), the district should provide PWN of its intent to implement the Contingency Learning Plan at the time it is developed.</p>

reflected in the body of the IEP, typically within the PLAAFP section.	
<ul style="list-style-type: none"> Notice must reflect the District's intent to implement the IEP/amendment. The IEP or amendment must be attached when the Notice is provided to the parent. 	This requirement continues to apply.
<p>Notice also must include any other concepts that were considered during IEP development but were not included in the IEP itself. These are considered actions that the district is refusing to take.</p> <p>These actions must be documented in either the "options considered and not selected" section of the Notice form, or in the "other relevant factors to the District's proposal or refusal" section of the Notice form.</p> <p>Documentation must include the action(s) that are not being taken, the reason for not taking them and the reports/data that form the basis for decision-making.</p>	<p>This requirement also applies to IEPs that are conducted virtually.</p> <p>It will be critical that all considerations are documented in the Notice that are not captured elsewhere.</p>
<p>Topics that may be appropriate to address in the "options considered but not selected" section of the Notice form include (but are not limited to):</p> <ul style="list-style-type: none"> Needs that are not considered priorities at this time and therefore will not be addressed by this IEP. Ideas for goals/objectives that were considered and rejected by the team. Programs/services that were discussed but not included in the IEP itself. Rationale for not including behavioral strategies in the IEP even if the student clearly has had some behavioral issues. 	The suggestions in the column to the left also apply to IEPs developed virtually and Contingency Learning Plans that will address distance learning.

<ul style="list-style-type: none"> • Supplementary aids that have been discontinued from the previous IEP. • Changes in the way the student will participate in district-wide or state-wide assessments which are not explained in the IEP itself. • Reasons that ESY was determined unnecessary. • Reasons that Assistive Technology was determined unnecessary. • Ideas that were suggested by any team member (parent or staff) which were not included in the IEP. 	
<p>Topics that may be appropriate to address in the "other relevant factors" section of the Notice page include (but are not limited to):</p> <ul style="list-style-type: none"> • Least restrictive environment considerations that were not documented in the IEP itself, including the potential harmful effects of any programming or placement decisions made by the IEP team. • Annual goals or short-term objectives that have been removed from the IEP or modified without an explanation in the IEP itself. • Changes in the time for various programs/services (i.e., increase or reduction in the minutes per week, including any changes that are related to differences in building schedules.) • An explanation of health/medical issues that are documented but do not impact the student educationally. • Rationale for items that are included in the IEP when such rationale is not clearly stated within the IEP itself. 	<p>The suggestions in the column to the left also apply to IEPs developed virtually and Contingency Learning Plans.</p> <p>Additional items that may be appropriate to address in the "other relevant factors" include:</p> <ul style="list-style-type: none"> • District response to parent requests for specific services during a school closure (what was requested and rationale for not providing.) • Reasons for changes in the frequency, duration, or location of programs or services due to a school closure. • Rationale for deviating from the amount of service provided to all students during a school closure. • Considerations around use of certain technology for distance learning vs. hard copies of materials for instruction at home. • Goals that were considered but not written because they might not be feasible during distance learning. • Considerations around the use of masks or other personal

<ul style="list-style-type: none"> Documentation of any future steps that the IEP team has agreed to pursue, such as reconvening after receipt of an outside report. 	<p>protective equipment which were discussed but decided against by the team.</p>
<p>The following steps/requirements also apply to provision of Prior Written Notice of an Offer of FAPE:</p> <ul style="list-style-type: none"> Notice must include the date on which the IEP will be implemented. Notice must include the location where the IEP will be implemented. Notice must include either: <ul style="list-style-type: none"> a copy of the procedural safeguards available to the parent under IDEA (required if it is the initial IEP), or for review IEPs or amendments, information about where the parent may obtain a copy of the procedural safeguards. Notice must include a list of organizations that are available to assist parents in understanding IDEA. 	<p>These requirements also apply to IEPs that are conducted virtually as well as Contingency Learning Plans.</p> <p>The "location" where the IEP will be implemented should be the school in which the student is enrolled.</p> <p>The Contingency Learning Plan addresses exceptions to that location, and because the Contingency Learning Plan is incorporated into the IEP (by reference or by attachment) any alternate location does not need to be specified here.</p>
<ul style="list-style-type: none"> Notice must be completed and provided to the parent (either in person or via US Mail) within 7 days of the IEP team meeting. <ul style="list-style-type: none"> If the due date of the new IEP will occur sooner than 7 days, prior written notice must be provided before the due date of the IEP. The date and method of delivery of Notice must be documented on the Notice form. Notice must be signed by the district superintendent or designee. 	<p>Even if school is closed, a hard copy of the notice (including the IEP) must be provided to the parent within 7 school days.</p>