

Provision of Services to Children with Disabilities in Early Childhood Programs During a School Facility Closure

Completing Transition Activities from IDEA, Part C to Part B

The federal requirements to ensure that children transitioning from Part C to Part B have an Individualized Education Program (IEP) in place by each child's third birthday **have not been waived**. School districts are expected to move forward with initial Part B evaluations as specified in the [Early Childhood Transition from Part C to B Timeline Requirements](#). School districts must make *reasonable* efforts to comply with the requirement and may utilize alternative means for conducting virtual assessment and IEP team meetings, such as telephone or videoconferencing.

Upon receiving Part C referral information, typically at least 90 days prior to the child's third birthday, school districts are required to contact the child's family to discuss procedures for determining eligibility within the transition process. The initial evaluation should begin with a review of existing data, including the most recent Part C evaluation report, to determine whether additional assessments are needed.

Districts should partner with families through ongoing communication and collaboration to complete the initial Part B evaluation, understanding that the process will not look the same for every student and family, and safety remains the priority. Steps should include:

- Establishing clear expectations of the evaluation process with the family;
- Clearly defining the roles of both the Individuals with Disabilities Education Act (IDEA) Part C and B partners;
- Making reasonable efforts to gain informed [written consent](#) (see question E-7 of [Questions and Answers \(Q&A\): Provisions of Services to Students with Disabilities During School Facility Closures for COVID-19](#));
 - Attempt to document consent during school facility closures using alternative means such as an email, a digital or e-signature, a digital photograph or scan of a parent signature on an applicable document, or district staff noting temporarily that consent was given verbally.
- Documenting all required communications with the child's family within the evaluation, IEP, and prior written notice; and
- Discussing timelines regarding when the evaluation, IEP, and service delivery will take place (as applicable).



The Evaluation team must also consider alternate ways of gathering additional data to support Part B eligibility during the school facility closure, including the use of assessment tools that do not require in-person implementation. Such methods might include:

- A virtual observation of the child with caregiver support during a play session or daily routine;
- Review of existing developmental information, including videos of the child, if available;
- A checklist completed by phone, virtual interview, or returned by mail delivery;
- Interviews with caregivers;
- Use of informed educational decision analysis paired with relevant and substantive, current data; and
- Guiding parents in simple activities that can then be reviewed together.
- Providing translations as necessary.

If the student is found to be eligible for Part B services, the district should make its best efforts to hold a team meeting and create an initial IEP, and document delivery alternatives provided during long-term facility closures through optional tools such as the [Continuous Learning Plan](#) (provided by OSPI) or similar communication and tracking forms. If personnel are available and parents are agreeable to completing service delivery via distance options (e.g., phone, Zoom, etc.), OSPI recommends continuing to conduct these meetings to the extent possible. Remember that the health and safety of all involved remains the priority during a school facility closure (see question E-5 of [Q&A](#)).

In summary, OSPI expects school districts will make *reasonable efforts* to complete as comprehensive an initial evaluation as possible, in a timely manner, with the understanding that once school facilities reopen, the team may need to consider additional assessment of the child's current needs. The optional [Continuous Learning Plan](#) template can assist the district in documenting decisions that are made for individual students. For more detailed information on completing evaluations during the COVID-19 closure, refer to the [April 2020 guidance](#) from the Washington State Association of School Psychologists (WSASP).

Additional resources to support remote service delivery include:

- [Supporting Inclusionary Practices during School Facility Closure](#)
- [Continuous Learning Implementation Guide](#)
- [Continuous Learning Plan](#)
 - [Plan de Aprendizaje Continuo para la Educación Especial](#)
- [Questions and Answers \(Q&A\): Provisions of Services to Students with Disabilities During School Facility Closures for COVID-19](#)
- [April 2020 WSASP](#)



- [Early Childhood Transition from Part C to B Timeline Requirements](#)
- [Technical Assistance Paper No. 5 \(TAP 5\) Revised](#)
- [The Early Childhood Technical Assistance \(ECTA\) Center](#)

The recommendation provided by Secretary DeVos on April 27, 2020 within The Coronavirus Aid, Relief, and Economic Security (CARES) Act Report to Congress recommends that the Part B transition timeline be extended to allow young children with disabilities to remain in the Part C system after their third birthdays until their Part B evaluation can be completed and an eligibility determination made. Learn more [here](#).

For assistance troubleshooting specific circumstances relating to Part B, IDEA, please contact Ryan Guzman, Early Childhood Special Education/Section 619 Coordinator at ryan.guzman@k12.wa.us or (360) 764-9448.

For more information on Part C service delivery during the COVID-19 school facility closures, visit [Washington State Department of Children, Youth and Families \(DCYF\)—Coronavirus-COVID-19 Updates—Early Support for Infants and Toddlers \(ESIT\)](#). For assistance troubleshooting specific circumstances relating to Part C, IDEA, please contact Val Arnold, ESIT Strategic Innovations Advisor, at valerie.arnold@dcyf.wa.gov or 360-485-7773.

Child Outcome Summary (COS) Entrance and Exit Ratings

IEP teams are expected to use assessments, observations, and referral information to give a student a COS entrance rating. If it is not feasible to give a child an anchor assessment at entrance, document what materials were used to determine the COS rating, and document within the appropriate reporting platform (e.g., Teaching Strategies GOLD®, IEP online, Excel federal reporting forms).

When completing the COS exit rating, the IEP team is expected to use *reasonable efforts* to meet and use available data that is reflective of the student's present level of performance. Sufficient data might include student work, observations, and assessments completed prior to the school facility closure, as well as parent or caregiver interviews, and/or formative assessments performed virtually. School districts should document measures taken to determine the exit rating within the appropriate reporting platform.

The timeline for submitting the Child Outcome Summary Report has been extended to August 14, 2020.

Questions to consider when determining an exit/entry COS rating:

Outcome 1: Child has positive social relationships

- How does the child relate to his/her caregiver(s)?
- Do these interactions with people differ depending on the setting the child is in?



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Outcome 2: Child acquires and uses knowledge and skills.

- How does the child use the words and skills she/he has in everyday settings (e.g., at home, at the park, at childcare)?
- What concepts does the child understand? Does she/he incorporate these skills into strategies to accomplish something meaningful? How?

Outcome 3: Child takes appropriate action to meet his/her needs.

- What does the child do when she can't get or doesn't have something she wants?
- What does the child do when he is upset or needs to be comforted?
- What does the child do when she is hungry?

For more information on how to complete Indicator B-7, Early Childhood Outcomes, during the COVID-19 School Facility Closure visit [OSPI/Early Childhood Outcomes \(Indicator 7\)](#) and the [Early Childhood Technical Assistance \(ECTA\) Center](#).

Transition to Kindergarten

The process for students transitioning to kindergarten will follow the same procedures as documented within the IEP prior to the COVID-19 school facility closures.

When preparing students with disabilities for the transition to kindergarten, it is important to consider how access to nondisabled peers will be provided to the maximum extent appropriate, as well as the continuum of alternative placement options that will be made available to meet the special education and related services of each student.

As the student is preparing to transition to kindergarten, the educational placement shall be determined by the IEP team, including parents, who are knowledgeable of the child's present level of performance, current evaluation data, and familiar with the continuum of placement options. It is important to document all decisions made and provide prior written notice as required. The optional [Continuous Learning Plan](#) template can assist the district in documenting decisions that are made for individual students.

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