

**Oak Hills Local School District COVID-19
Services for Students with 504s/IEPs/ISPs (Public and Non-Public)
Q and A**

With all the recent news surrounding coronavirus (COVID-19), we know you have questions about how special education services may be impacted. We are gathering information from numerous resources across the state. Please be aware that guidance can change as new information is provided at the state and federal level regarding special education services.

[**Submit Questions Here**](#)

TABLE OF CONTENTS

[Confidentiality & Professionalism](#)

[Remote Learning Activities: Core Curriculum](#)

[Specially Designed Instruction and Related Services](#)

[Special Education Compliance, Timelines, Signatures, and EMIS](#)

[Social-Emotional Learning and Mental Health Services](#)

[Parent Communication](#)

[Section 504 Support](#)

[Non-Public Student Services \(Parochial Services\)](#)

[Internal Communication](#)

Confidentiality & Professionalism

(Updated 3/22/20)

As our legal council has always advised, “Be prepared to defend in court anything that you have put in a school document, email, text, social media, etc.”. EVERYTHING is subject to public records request.

Per the Ohio Department of Education, “The Department, in accordance with the Ohio Revised Code, defines records as including the following: Any document – paper, electronic (including, but not limited to, e-mail), or other format – that is created or received by, or comes under the jurisdiction of a public office that documents the organization, functions, policies, decisions, procedures, operations, or other activities of the office. All records of the Department are public unless they are exempt from disclosure under state or federal law.” “Documents in electronic mail format are records as defined by the Ohio Revised Code when their content relates to the

business of the Department. E-mail is to be treated in the same fashion as records in other formats and should follow the same retention schedules.” Records in private email accounts used to conduct public business are subject to disclosure...”

Remote Learning Activities: Core Curriculum

Student Services Remote Learning Decision Making Flowchart

How does ODE address services to students when schools or districts provide “Alternative Means of Education (remote learning activities)?

(updated 3/20/20)

The Oak Hills Local School District will not be providing educational services from March 16 to March 27th (spring break and week 2-Professional Development Preparation Week). Per ODE guidance, “when a district or school is not in session and educational services are not provided to any student, specially designed instruction and related services are not required to be provided to students with disabilities.”

Beginning March 30, Oak Hills will begin remote educational services for students PK-12. Per ODE guidance, “if a school district chooses to educate students through online or distance learning in place of in-person instruction, the school or district should make a good faith effort within available capabilities to meet Free Appropriate Public Education (FAPE) requirements and do the following with regard to students with disabilities:

- Ensure all special education students have access to computers and internet or other acceptable connectivity (such as cell phone service).
- Ensure all students in the school or district have equal access to the learning and required materials, including technology.”

How will buildings ensure students have access to computers and internet connectivity?

(updated 3/20/20)

District communication will be sent to all district parents on March 19th requesting that parents contact the building attendance line to notify the building if they have technology needs. Parents should leave a message on the attendance line so school staff can return their call to assist with technology needs.

Charter Communications is offering free Spectrum broadband and Wi-Fi access to families with students in K-12 who do not already have a Spectrum broadband subscription. To access this, parents should call 844-488-8395. For more information: <http://bit.ly/33qxdU>

Beginning March 23rd, case managers are expected to investigate if each family has technology access in order to complete the remote learning activities being planned by the child's core teachers. Case managers should keep personal documentation noting if a student has technology and internet access and notify the building administration if families need technology assistance.

What are the expectations for supporting student access to the curriculum while engaging in remote learning?

(updated 3/26/20)

The intervention specialist, related service team, and teacher(s) will be expected to collaborate virtually during the mandated closure period to create instructional materials and resources that meet the individual needs of each child based on their IEP. The team should also ensure all remote learning materials are accessible and meet the accommodations/modifications per their IEP. The team should closely examine all barriers to learning that may now occur due to the school closure. For example, did the student use a visual timer in the classroom as an accommodation on their IEP, and the parent may now need consultation for home-based suggestions. Documentation of the collaboration time should be maintained by each IEP team member throughout the school closure period.

If a remote learning activity is not accessible, an alternative instructional activity should be created and provided. Any alternative instructional activities that were provided due to the consultation should be documented by the school-based IEP team members as well. **All remote learning adaptations due to technology access or barriers to learning due to the school closure will be documented in a Prior Written Notice (PR-01).**

- **EXAMPLE PR-01 FORM - COVID-19 INSTRUCTIONAL** (use example to assist when writing student remote learning plan. Use PR-01 in Progress Book.)

What if a student has difficulty accessing the curriculum while engaging in remote learning even after alternative instructional activities were provided?

(updated 3/26/20)

If no alternative remote instructional options are available due to the student's inability to access any technology or internet, or due to their disability or safety concerns, then services may be delayed. This requires a phone conference or virtual meeting with the parent to discuss all options. ***A building administrator must be on the phone conference or virtual Google meeting.*** Document this decision in a Prior Written Notice (PR-01). The IEP team will need to reconvene after school resumes to review data and determine the potential need for compensatory services.

- **EXAMPLE PR-01 FORM - COVID-19 INSTRUCTIONAL** (use example to assist when writing student remote learning plan to delay services. Use PR-01 in Progress Book.)

Specially Designed Instruction and Related Services

Student Services SDI Flowchart

REQUIRED: OHLSO COVID-19 Specially Designed Instruction Tracking Log (make a copy)

- First tab of tracking document provides suggested talking points for holding initial parent/guardian conversations.

(updated 3/23/20)

Will we need to provide special education services during the school closure to students with an IEP (specially designed instruction and related services)?

(updated 3/20/20)

As shared above, the Oak Hills Local School District will not be providing educational services from March 16 to March 27th (spring break and week 2-Professional Development Preparation Week). Per ODE guidance, “when a district or school is not in session and educational services are not provided to any student, specially designed instruction and related services are not required to be provided to students with disabilities.” Therefore, no IEP specially designed instruction and/or related services will be required to be delivered or made up during between March 16-March 27.

Beginning March 30, Oak Hills will begin remote educational services for students PK-12. Per ODE guidance, “if a school district chooses to educate students through online or distance learning in place of in-person instruction, the school or district should make a good faith effort within available capabilities to meet Free Appropriate Public Education (FAPE) requirements and do the following with regard to students with disabilities:

- Ensure the online learning system can effectively support the district’s deployment of FAPE, including the ability to provide differentiated instruction and one-on-one support for students who need it. Regardless of where the learning is happening, supports and services identified within a student’s IEP must be provided to the extent practicable and without putting the health and safety of students or educators at risk as long as the school district is operating.
- Provide related services such as occupational therapy, physical therapy and speech language therapy in an online format to the extent practicable.
- Provide training to staff, students, parents and guardians enabling them to use the online system and understand the district’s expectations for use of the system. All training can be accomplished virtually.

- Track and document services provided pursuant to the IEP.
- Address how aide services or assistive technology will be provided.”

Where can I go for specially designed instruction and related service resources to meet remote learning instructional needs for students with disabilities?

(updated 3/20/20)

Suggestions for remote learning specially designed instruction and/or related services might be:

- Scheduled read alouds with questioning through a virtual platform with student (parent must also be online)
- Video modeling methods of using graphic organizers/online tools/repeated readings/etc.
- Therapists consulting with parents
- Creating visual schedules/stories for students
- Providing parent training and script of a repeated reading activity

Intervention Specialists and Related Service Providers may consider collaborating district wide by utilizing the OHLSD Course Assignments Document (2020 Spring Grade Level Plans).

Suggestions for remote learning activities and/or resources can be linked to share with colleagues.

Is there a recommended professional development resource that provides suggestions for teaching special education services through remote learning activities?

(updated 3/22/20)

We suggest our student services team participate in the following webinar to learn strategies for making good faith efforts with adjusting special education services to remoting learning activities. The Council for Exceptional Children (CEC) provided a useful and free webinar, [“Teaching Special Education Online During COVID-19”](#). Presented by Kelly J. Grillo, Ph.D., Cooperative School Services, and Jeremy Glauser, eLuma. Original air date March 19, 2020.

Resources from this webinar:

- [Webinar Slides \(resources on last slide\)](#)
- [Best Practices for Educating Online handout](#)

What if we feel that the specially designed instruction and/or related services will need to be adjusted due to the remote learning environment due to the school closure?

(updated 3/26/20)

As part of the school’s review of the IEP to determine services, the case manager and related service providers will discuss the remote learning plan via phone conference or virtual meeting

and document all adjustments to the specially designed instruction and/or related services on the PR-01.

- **EXAMPLE PR-01 FORM - COVID-19 INSTRUCTIONAL** (use example to assist when writing student remote learning plan. Use PR-01 in Progress Book.)

What if we feel that no alternative options are available to provide specially designed instruction and/or related services due to the remote learning environment due to the school closure?

(updated 3/26/20)

If no alternative remote options are available to provide SDI due to the student's inability to access any technology or internet, or due to their disability or safety concerns, then services may be delayed. This requires a phone conference or virtual meeting with the parent to discuss all options. ***A building administrator must be on the phone conference or virtual Google meeting.*** Document this decision in a Prior Written Notice (PR-01). The IEP team will need to reconvene after school resumes to review data and determine the potential need for compensatory services.

- **EXAMPLE PR-01 FORM - COVID-19 INSTRUCTIONAL** (use example to assist when writing student remote learning plan to delay services. Use PR-01 in Progress Book)

Will Home Instruction, Homebound Instruction, or community-based itinerant services be continued during the closure?

(updated 3/26/20)

Starting March 16, Home Instruction, Homebound Instruction, or community-based itinerant services will not occur during the school closure. The district team will be evaluating the date for services to resume. The case manager should consider if alternate modes of remote learning can be provided. In many cases, remote learning options may be appropriate.

As part of the school's review of the IEP to determine services, the case manager will discuss the remote learning plan via phone conference or virtual meeting and document all adjustments to the specially designed instruction and/or related services (which includes changes to instructional assistant services) on the PR-01. If no services are able to be provided after considering all options, then document the final decision on the PR-01. ***A building administrator must be on the phone conference or virtual Google meeting.***

- **EXAMPLE PR-01 FORM - COVID-19 INSTRUCTIONAL** (use example to assist when writing student remote learning plan or delaying services. Use PR-01 in Progress Book)

Will Instructional Assistant services be continued during the closure, and what will they do?

(updated 3/26/20)

Starting March 16, instructional assistant services will not occur during the school closure. Instructional Assistants will not be able to provide services at the student's home due to COVID-19 safety concerns and required social distancing measures. The district team will be evaluating the date for services to resume.

Instructional assistants will continue to work from home during the mandated school closure. It is expected that intervention specialists plan virtual meeting time with their instructional assistants during the closure and document their time. Use professional judgement on how to use this time to your advantage. Instructional assistants will also be provided virtual professional development resources to read, watch, review while on school closure. They will be asked to document their professional learning time and activities. Building administrators may choose to access their instructional assistants to assist with phone/virtual well-checks for the general population as long as instructional assistants are provided guidance from their administrator, are only providing general information (i.e., reminder of the COVID-19 district website), and taking questions for the building administrator. They should not be asked to answer any questions or provide direct instruction or consultation to students or families.

As part of the school's review of the IEP to determine services, the case manager will discuss the remote learning plan via phone conference or virtual meeting and document all adjustments to the specially designed instruction and/or related services (which includes changes to instructional assistant services and nurse attendant services) on the PR-01. ***A building administrator must be on the phone conference or virtual meeting.***

- **EXAMPLE PR-01 FORM - COVID-19 INSTRUCTIONAL** (use example to assist when writing student remote learning plan. Use PR-01 in Progress Book)

Special Education Compliance, Timelines, Signatures, and EMIS

Are we required to meet special education/Section 504 timelines?

(updated 3/20/20)

At this time, the Office of Civil Rights and the Ohio Department of Education continue to require school districts to meet special education timelines, however, they have provided exceptions in regard to circumstances due to the school closure that we outline below. Only meetings that are due March 23rd to April 5th will need to be held during the school closure via phone conference or video conference (Using Google Meet for Video Meetings). We request that any ETR, IEP, or Section 504 meetings that were previously planned during this time, but

ARE NOT DUE per their mandated timeline, be rescheduled after the 3-week closure (ensuring that you continue to meet any mandated timelines with your rescheduled date).

Initial Evaluations (IETR) and Re-evaluations (RETR)

(updated 3/26/20)

Per ODE guidance, “to the extent practicable, initial evaluation team reports must be completed within the 60-day mandated timeline as prescribed in the Individuals with Disabilities Education Act (IDEA) and Ohio Administrative Code 3301-51-061. **If an evaluation of a student with a disability requires a face-to-face assessment or observation, the evaluation will need to be delayed until the ordered school-building closure ends.** Evaluations and re-evaluations that do not require face-to-face assessments or observations may take place during the ordered school-building closure, so long as a student’s parent or legal guardian consents. These same principles apply to similar activities conducted by appropriate personnel for a student with a disability who has a plan developed under Section 504 or who is being evaluated under Section 504.”

- Evaluations where face-to-face assessment or observations are needed:
 - Contact parent to obtain consent to delay evaluation.
 - Document decision in a PR-01 in progress book: EXAMPLE PR-01 FORM - COVID-19 ETR
 - Email parent PR-01 and Procedural Safeguards
 - During the closure, gather data that does not require face-to-face assessments (ie-rating scales, teacher input).
- Evaluations where face-to-face assessment or observations are **not** needed:
 - Reviews of the evaluation team report can be completed using a virtual format or via telephone.
 - Participation and required signatures can be documented via email attachment, standard mail, scanned signature, photograph of the signature or any other electronic means.
 - The method of conducting an evaluation team report review and signature collection should be documented in a prior written notice (PR-01)
- Upcoming Reevaluations
 - As is the case with a typical re-evaluation, a district may choose to conduct a records review. This allows the district to update the evaluation without needing to conduct face-to-face assessments and observations.
 - Per guidance from ODE, during the mandated school closure only, new observations are not required for RETRs.
 - Document the records review option for an RETR during the school closure on a PR-01: EXAMPLE PR-01 FORM - COVID-19 ETR

- Teams can decide to complete an observation once school resumes if the data is necessary.
- Signature collection method should also be documented in a prior written notice (PR-01).

Initial IEPs

- Initial IEPs can be completed if a full ETR was completed and the student meets eligibility per ODE Special Education Operating Standards.
- Initial IEPs can be completed using a virtual format or via telephone.
- All Initial IEP procedures must be followed, including obtaining parent consent for special education services.
- Participation and required signatures can be documented via email attachment, standard mail, scanned document, photograph of the signature or any other electronic means, and the method of IEP team review and signature collection should be documented in a prior written notice form (PR-01).

Annual Review IEPs (RIEPs)

- IEP annual reviews can be completed using a virtual format or via telephone.
- If the IEP team feels they have data and information to proceed, then only make changes to the IEP that the team feels comfortable updating based on the current data. Make all changes based on school-based services (not as if they are assigned to remote learning). Document clearly in the PR-01 if the team will need to re-meet after the school closure to continue to discuss certain areas of the IEP.
- Until we receive further guidance from ODE, at this time, only conduct RIEPs that are due. If the team feels that they do not have information to change the IEP, then write in the profile section information about the school mandated closing and that the team will continue the current goals and services until the school closure period is lifted and a meeting can be rescheduled. Document in the PR-01 and complete all EMIS forms to ensure timelines are met.
- Participation and required signatures can be documented via email attachment, standard mail, scanned document, photograph of the signature or any other electronic means, and the method of IEP team review and signature collection should be documented in a prior written notice form (PR-01).

Early Intervention (EI) Transition Meetings

- Participate using a virtual format or via telephone.
- Participation and required signatures can be documented via email attachment, standard mail, scanned signature, photograph of the signature or any other electronic means.

How do we obtain parent signatures?

(updated 3/22/20)

IEP annual reviews, ETRs, ISPs, and Section 504 meetings can be completed using a virtual format or via telephone. Per ODE Guidance, participation and required signatures can be documented via email attachment, standard mail, scanned document, photograph of the signature or any other electronic means, and the method of IEP team review and signature collection should be documented in a prior written notice form (PR-01). If these methods can not be used due to lack of technology, then:

1 In the meeting, ensure to verbally obtain agreement from all team members, so it is clear the intent of all members.

2. Note in the PR-01 that all signatures will be obtained after the school closure period ends. Also, note in the PR-01 which team members agreed and/or disagreed on the phone/virtual meeting with the IEP/ETR/504.

3. Then, email the final document, PR-01, and Procedural Safeguards to the family and request the parent/guardian send an email noting agreement. Save the email with all special education records.

***If you have an initial IEP, contact Diane Hrzic (hrzic_d@ohlsd.org) for assistance with obtaining the parent signature. She will assist with sending a copy home to the parent with a returned envelope for the district office.

How do I report EMIS information to district office during the mandated school closure?

(updated 3/23/20)

- PK- submit both Special Ed Events page and Verify EMIS page electronically to Lori Ohmer via email (attach both documents in one email per student)
- K-8- submit both Special Ed Events page and Verify EMIS page electronically to Lis Klotz via email (attach both documents in one email per student)
- 9-23- submit both Special Ed Events page and Verify EMIS page electronically to Kerri Muench via email (attach both documents in one email per student)
- Parochial- submit both Special Ed Events page and Verify EMIS page electronically to Shari Kaufhold via email (attach both documents in one email per student)
- Section 504- submit Verify EMIS page electronically to Karen Zahneis via email (one email per student)

What should I do with all IEP, ETR, ISP, and Section 504 documents (required on the district compliance checklists) during the mandated school closure?

(updated 3/22/20)

Case Managers will hold on all documents until they can return to the building to print documents and obtain signatures. Staff will be notified when they can return to the school buildings.

Social-Emotional Learning and Mental Health Services

How can I support the social-emotional needs of my students during this time?

(updated 3/20/20)

Collaborate with your school psychologists/counselors to coordinate well-checks for your students who require social-emotional support. More information will be provided from the school psychology/counseling team regarding additional ways to support the social-emotional needs of students while they engage in remote learning.

How can parents access mental health supports for their child during this period of time?

(updated 3/20/20)

The Oak Hills Local School District partners with Cincinnati Children's Hospital Medical Center to provide mental health supports to our students. They have shared the following message to guide our families: "**Cincinnati Children's Hospital Medical Center is committed to the safety of all patients.** Similar to the rest of the country, CCHMC has the potential to be impacted by the COVID-19 virus and we are expecting an increase in patients presenting to our emergency departments. Our goal is for patients who do not need emergent care to avoid the emergency department in an attempt to avoid unnecessary exposure to infectious illness. For mental health crisis or emergencies, patients and families are encouraged to contact their current mental health provider first. This allows the mental health provider, who knows your child best, to provide support and direction. If your child does not have a mental health provider, and they are experiencing a non-life threatening mental health crisis, you are encouraged to contact the Psychiatric Intake Response Center (PIRC) at CCHMC **513.636.4124**. The PIRC staff will help you to decide the most effective level of intervention for your child's mental health crisis – which may include an urgent psychiatric assessment in the PIRC Bridge Clinic. You should go to the emergency department if you are experiencing a medical emergency, a life-threatening mental health crisis, or are directed to go there by a medical provider. This will help limit the spread of the virus in our community and allow our emergency departments to care for patients with the most critical needs first."

Parent Communication

What should I tell families if they ask about services for their student?

(updated 3/20/20)

The district team will be sending out communication to families as decisions are made throughout the school closure. However, if you receive an email from a parent specifically asking about how special education services will be delivered, we suggest sharing the following statement:

I will be collaborating with “student’s” IEP service providers virtually during the mandated closure period to create instructional materials and resources that meet the individual needs of your child based on their IEP. We are dedicated to making a good faith effort to ensure the delivery of special education and related services while school is closed. If “student” has challenges with accessing the remote instruction or related services due to their disability, then our IEP team, including you as the parent, will meet with a phone conference or video conference to discuss “student’s” needs and identify the most appropriate means for meeting those needs during the closure period.

Section 504 Support

Where can I receive support for students with Section 504 Plans?

(updated 3/20/20)

Building 504 Coordinators (school psychologist or school counselor) will collaborate with regular education teachers to ensure 504 eligible students receive appropriate educational access during the mandated school closure. It is expected that they will be available by email or phone during a specified window of time each week to directly assist with Section 504 questions. The office hours should be communicated to the building general education staff and during normal contract hours. If there are any concerns with the delivery of Section 504 accommodations, the general education team should follow the above guidance used for IEPs and document on a Section 504 Prior Written Notice. The school psychologist or school counselor will facilitate that process if needed.

Timelines that are due for any Section 504s need to be maintained during the school closure period.

Non-Public Student Services (Parochial Services)

Are we required to provide services in the non-public schools outlined on an Individual Service Plan (ISP)?

(updated 3/22/20)

ODE has not addressed ISP services directly in their guidance, and may at a later point. At the current time, we would interpret that ISP services are not required to be delivered over the course of the state-mandated shutdown, as the state and federal guidance only discuss a student's rights to receive special education and related services as outlined in IDEA and to ensure FAPE in the public schools with a student's IEP services. We would then interpret that public schools and community schools providing educational services are required to continue providing FAPE if a student is eligible for services through an IEP, and not an ISP. Since we interpret it to not be required in the non-public schools, we will leave the decision up to the parochial school administration on if, and how, they will provide educational services during the mandated school closure period.

Do non-public timelines need to be met as well (Initial ISP, Review ISP, Initial ETR, Re-evaluations (RETRs), and Jon Peterson IEP timelines)?

(updated 3/22/20)

Yes. All timelines must continue to be met as stated above. This includes ISPs and Scholarship IEPs. See above for the guidance we offer for meeting timelines and any exceptions provided by the state in regard to evaluation procedures.

Will the Oak Hills employees working in the non-public schools continue to provide support during the mandated school closure?

(updated 3/22/20)

All Oak Hills employees working in the non-public schools will continue to work from home virtually during their contracted hours. We will provide professional development suggestions during the shut-down period. Staff should continue to ensure all timelines are monitored and required student services meetings/documents are completed (phone conferences or virtual meetings) according to the above guidance. Oak Hills non-public staff are asked to document their professional learning time and daily activities during the mandated school closure period. Non-public school administrators can assign home-based duties that they feel are appropriate, and that would support their building and school community.

Internal Communication