



Washington Office of Superintendent of
PUBLIC INSTRUCTION

*Special Education Reopening
Guidance: Least Restrictive
Environment (LRE) Case
Studies*

SPECIAL EDUCATION REOPENING GUIDANCE: LEAST RESTRICTIVE ENVIRONMENT (LRE) CASE STUDIES

September 2020

Glenna Gallo

Assistant Superintendent of Special Education

Prepared by:

- **Tania May**, Director of Special Education
tania.may@k12.wa.us | 360-725-6075
- **Jennifer Story**, Special Education Coordinator
jennifer.story@k12.wa.us | 360-725-6075
- **Ryan Guzman**, Early Childhood Special Education Coordinator
ryan.guzman@k12.wa.us | 360-725-6075
- **Alexandra Toney**, Program Improvement Supervisor
alexandra.toney@k12.wa.us | 360-725-6075
- **Dr. Rebecca Lynn**, Program Improvement Supervisor
rebecca.lynn@k12.wa.us | 360-725-6075

TABLE OF CONTENTS

Considerations for IEP Development and Implementation Across Reopening Models.....	1
IEP Guidelines.....	1
LRE Requirements under IDEA.....	1
Identifying Setting for LRE Calculations.....	1
Settings in Distance/Hybrid Learning Models.....	2
Accommodations and Modifications.....	2
Parent Support Across Reopening Models.....	2
Elementary Case Study.....	4
Elementary Case Study: SDI in a Distance Model.....	4
Elementary Case Study: SDI in a Hybrid Model.....	6
Behavior Case Study.....	7
Behavior Case Study: SDI in a Distance Model.....	7
Behavior Case Study: SDI in a Hybrid Model.....	9
Transition Case Study.....	11
Transition Case Study: SDI in a Distance Model.....	11
Transition Case Study: SDI in a Hybrid Model.....	13
Preschool Case Study.....	16
Preschool Case Study: SDI in a Distance Model.....	17
Preschool Case Study: SDI in a Hybrid Model.....	19
Appendix: Frequently Asked Questions about LRE across Reopening Models.....	22

CONSIDERATIONS FOR IEP DEVELOPMENT AND IMPLEMENTATION ACROSS REOPENING MODELS

IEP Guidelines:

- IEPs must be current and in effect at the start of the 2020-21 school year.
- The services needed by the student in order to receive FAPE must be reflected in the IEP.
 - In many cases, teams will be able to implement IEPs, as written, across reopening models.
 - In cases where that is not possible, IEP amendments can reflect changes, such as due to safety restrictions and/or emergent needs in new learning environments, etc.
 - An equitable approach means focusing on what each individual student with a disability needs to access the curriculum, to engage with various instructors and resources, and to have an opportunity to make progress within the context of the barriers created by COVID-19.

LRE Requirements under IDEA:

- Least restrictive environment (LRE) is determined by a student's IEP team based on the presumption that the general education environment with non-disabled peers is the first choice.
- The removal from the general education environment only occurs if the nature or severity of the disability is such that education in general education classes with the use of supplementary aides and services cannot be achieved satisfactorily.
- It is important to note that while the COVID-19 pandemic has not changed the individual student's right to LRE, it has changed how the general education system operates. These operational changes require school systems to determine how they will maintain each individual student's LRE in the new context in which they are operating.

Identifying Setting for LRE Calculations:

- Services can be provided in a general education setting or a special education setting, through synchronous or asynchronous delivery.
- A special education setting is defined as "a program that includes less than 50% nondisabled children (i.e., children not on IEPs)."¹
- In situations where all students in a school or district are participating in a distance learning model, the student's home is the setting from which all students are accessing their instruction. Therefore, **generally, the student's home is considered the general education setting**².

IMPORTANT: When calculating LRE, the setting in which the student receives services is based on the level of access to the student's peer group.

- Setting does not depend upon the content of the instruction nor the person delivering it.
- Just because it is specially designed instruction (SDI) or a related service and is designed by a special education teacher doesn't automatically mean it is a special education setting.

¹ [IDEA, Part B Data Dictionary.](#)

² The LRE setting guidance included in this resource is adapted from the 2016 [IDEA Data Center \(IDC\) Online Learning and IDEA Educational Environments.](#)

Settings in Distance/Hybrid Learning Models:

- Again, the home setting in a distance learning model would generally be considered a general education setting for calculating LRE.
- Asynchronous learning (prerecorded videos, modified online programs, or work packets) may be considered SDI in accordance with WAC 392-172A-01175. Asynchronous services will typically be considered a general education setting.
- There may be situations, however, where these services may be considered a special education setting. Here are some examples:

General Education Setting	Special Education Setting
A student with an IEP participates in instruction with a prescribed time/location (i.e., synchronous instruction), and at least half (50%) of the students participating in this instruction do <u>not</u> have IEPs.	A student with an IEP receives synchronous (i.e., live), distance instruction related to their IEP goals individually or in a group consisting primarily (51% or more) of students with IEPs.
A student with an IEP participates in asynchronous learning activities such as prerecorded lessons, modified online programs, work packets, etc., that can be completed at home.	A student with an IEP watches a pre-recorded lesson prepared by the special education teacher that is intended for follow-up discussion only with other students with IEPs.

Accommodations and Modifications:

- Adaptations (accommodations and modifications) are planned and implemented through continuous collaboration between educators, administrators, and families.
- Districts should reimplement pre-closure IEP's and adjust IEPs as needed to provide additional services accommodations and/or modifications that address a student's needs.

Parent Support Across Reopening Models:

- Parent training can be provided as additional support to families to support learning in the distance and hybrid learning environments.
- Systems may decide to develop general parent training videos to support all families in understand topics such as how to set up an effective learning environment, how to access and use a learning platform or general positive behavior supports. Depending on student need, parent training minutes could also be part of a districts offer of FAPE for an individual student. Depending on the intended purpose of parent training, IEP teams can add parent training support to an IEP as either a supplementary aids and service or as a related service.
 - Related Services³ are defined as services that are required to assist a student eligible for special education to benefit from special education services
 - Supplementary Aids and Services⁴ are defined as aids, services and other supports that are provided in general education classes or other education-related settings to enable students eligible for special education to be educated with non-disabled students to the maximum extent possible in accordance with the least restrictive environment requirements
- OSPI, Special Education has created a series of 3 parent coaching videos that can be shared with parents or districts can develop and deploy their own based on need identified throughout the

³ [WAC 392-172A-01155](#)

⁴ [WAC 392-172A-01185](#)

school year.

- [Supporting Positive Behavior in Continuous Learning Environments-Part One](#)
- [Supporting Positive Behavior in Continuous Learning Environments-Part Two](#)
- [Supporting Positive Behavior in Continuous Learning Environments-Part Three](#)

ELEMENTARY CASE STUDY

Case Study Background⁵: Susan will be entering a third-grade class with 26 students at the start of the 2020-21 school year. Per her annual IEP dated 2/20/2020, she receives the following services under the disability classification of specific learning disability:

Service Area	Frequency	Location	Duration
Math	150 minutes per week	General Ed	through 2/19/2021
ELA	250 minutes per week	Special Ed	through 2/19/2021
Speech	30 minutes per week	Special Ed	through 2/19/2021
Total instructional minutes per week: 1,665			
Weekly minutes in a special ed setting: 280			
LRE Calculation: 83%			

Present Levels Update: Susan’s local community has experienced an outbreak of COVID-19 in recent weeks and is considering multiple operational models for the start of the 2020-21 school year. Her IEP will be amended to plan for FAPE across all reopening models. During Spring 2020, once Susan and her family adjusted to online learning, they reported that Susan enjoyed the format and felt motivated by choosing her own project-based learning. Susan’s family maintained contact with the case manager throughout the spring and requested some support around use of Zoom and Google Classroom.

Elementary Case Study: SDI in a Distance Model

School Plan for Distance Learning:
Students will participate in a distance/remote model for educational services. This model will be implemented through December 2020 for all students.
IEP Team Planning for Susan’s Access to Distance Learning:
Susan will participate in a virtual learning model with her general education third-grade class.
Math SDI will include: <ul style="list-style-type: none"> • 30 minutes three times per week through adapted online curriculum, with asynchronous support. (<i>general education setting</i>) • One 60-minute, small-group virtual support session with the special education teacher and other classmates (with and without disabilities), after whole-group general instruction. (<i>general education setting</i>)
ELA SDI will include: <ul style="list-style-type: none"> • 50 minutes two times per week through adapted online curriculum, with asynchronous support. (<i>general education setting</i>) • Three 50-minute, small-group virtual support session with the special education teacher and other classmates with disabilities, after whole-group ELA core instruction. (<i>special education setting</i>)
Speech will be provided in one weekly, 30-minute, small-group virtual session with the SLP and two other students with IEPs. (<i>special education setting</i>)

⁵ This case study is adapted from National Association of State Directors of Special Education (NASDSE) [LRE Brief during COVID-19](#).

Accommodations & Modifications: Visual math supports.

Parent Support will be provided to the family by connecting them to the parent training page on the district website. The parents will be directed to two specific asynchronous videos that contain support to utilize Google Classroom and Zoom, but there are also videos available on other topics if parents would like additional general support⁶.

Progress monitoring data will be documented and reviewed regularly, via IEP goal progress, provider notes, student grades and work samples, and progress on the adapted online curriculum.

Service Matrix Considerations:

From amended IEP, dated 8/6/2020:

Service Area	Frequency	Location
Math	150 minutes per week	General Ed
ELA	250 150 minutes per week	Special Ed
ELA	100 minutes per week	General Ed
Speech	30 minutes per week	Special Ed
Total instructional minutes per week: 1,665		Weekly minutes in special ed setting: 180

NOTE:

- The total minutes per week of specially designed instruction remains the same as the annual IEP.
- The location of a portion of the ELA services has changed from special ed to general ed. This is because the ELA services provided through adapted online curriculum is considered a general education setting.

LRE Calculation:

Bell schedule: 1,665 minutes per week

Susan's weekly minutes in special ed setting: 180 (150 ELA + 30 speech)

LRE = (total minutes minus special ed minutes) divided by total minutes times 100

= $(1665 - 180) \div 1665 \times 100 = 89\%$

LRE Statement from amended IEP, dated 8/6/2020:

Across all reopening models, Susan requires small-group support to benefit from her specially designed instruction in reading and speech. She will receive 150 minutes per week of ELA instruction and 30 minutes per week of speech services in a special education during both distance learning and hybrid learning. Her remaining special education services will be provided in a general education setting.

⁶ The parent support provided to Susan's family is not student specific supports or part of the districts offer of FAPE, so they are not added onto the IEP.

Elementary Case Study: SDI in a Hybrid Model

School Plan for Hybrid Learning:
Students will follow an alternating schedule to reduce the number of students on campus and in each classroom. Students will report to school two or three days per week with social distancing procedures in place and will use a virtual platform on the remaining days. Students will attend in groups of no more than 10 students, minimizing transitions whenever possible. This model will be implemented for selected students starting in November 2020, if permitted by health guidelines.
IEP Team Planning for Susan's Access to Hybrid Learning:
Starting in November, Susan will attend school in person for three days per week, in groups of no more than 10 students.
Math SDI will include: <ul style="list-style-type: none">• 45 minutes, two times per week through adapted online curriculum, with asynchronous support. <i>(general education setting)</i>• 30 minutes two days per week, in the general education classroom, with a paraeducator. <i>(general education setting)</i>
ELA SDI will include: <ul style="list-style-type: none">• 50 minutes two times per week through adapted online curriculum, with asynchronous support. <i>(general education setting)</i>• 50 minutes, three days per week, in person, with a reading specialist in the LAP classroom, in a small group of peers with disabilities. <i>(special education setting)</i>
Speech will be provided in one weekly, 30-minute, small-group virtual session with the SLP and two other students with IEPs. <i>(special education setting)</i>
Accommodations & Modifications: Visual math supports.
Parent Support: will be provided to the family by connecting them to the parent training page on the district website. The parents will be directed to two specific asynchronous videos that contain support to utilize Google Classroom and Zoom, but there are also videos available on other topics if parents would like additional general support.
Progress monitoring data will be documented and reviewed regularly, via IEP goal progress, provider notes, student grades and work samples, and progress on the adapted online curriculum.
Service Matrix Considerations:
N/A – no amendment needed; service matrix dated 8/6/2020 remains in effect.
LRE Calculation:
Remains 89% in general education
LRE Statement:
No change from amended IEP, dated 8/6/2020

BEHAVIOR CASE STUDY

Case Study Background: Kaleb will be entering the sixth-grade class with 29 students at the start of the 2020-21 school year. Per his annual IEP dated 1/27/2020, he receives the following services under the disability classification of emotional behavioral disability:

Service Area	Frequency	Location	Duration
Math	150 minutes per week	General Ed	through 1/27/2021
Social Emotional	225 minutes per week	Special Ed	through 1/27/2021
Speech	30 minutes per week	Special Ed	through 1/27/2021
Total instructional minutes per week: 1,665			
Weekly minutes in a special ed setting: 255			
LRE Calculation: 85%			

Present Levels Update: Kaleb’s local community has experienced an outbreak of COVID-19 in recent weeks and is considering multiple operational models for the start of the 2020-21 school year. His IEP will be amended to plan for FAPE across all reopening models. Based on parent and teacher report, Kaleb behavior was a barrier to him accessing much of the instruction and services offered to him in Spring of 2020. Parents report that Kaleb did not respond to strategies they tried to support him and would become easily frustrated or would “check out.” Parents report that Kaleb had difficulties managing his schedule, login requirements and due dates. Additionally, when presented with multiple task demands or unanticipated changes, Kaleb was reported to engage in task avoidance (by leaving the learning environment) or in tantrum behaviors (loud vocalization and mild property destruction). Parents would like strategies to support Kaleb engage in learning in the home environment and to manage his behaviors.

Behavior Case Study: SDI in a Distance Model

School Plan for Distance Learning:
Students will participate in a distance/remote model for educational services. This model will be implemented through December 2020 for all students.
IEP Team Planning for Kaleb’s Access to Distance Learning:
Kaleb will participate in a virtual learning model with his gen education sixth-grade class.
<p>Math SDI will include:</p> <ul style="list-style-type: none"> • 30 minutes three times per week through adapted online curriculum, with asynchronous support. <i>(general education setting)</i> • 30-minutes two times per week of small-group virtual support sessions with the special education teacher and other classmates (with and without disabilities), after whole-group general instruction. <i>(general education setting)</i> <p>Social Emotional SDI will include:</p> <ul style="list-style-type: none"> • 30 minutes two times per week of small group online instruction with all students with IEPs on how to utilize a student specific schedule template, with asynchronous support. <i>(special education setting)</i> • 10 minutes five times per week of paraeducator support in the general education virtual classroom to support successful schedule use. These occur in a “break out room”, similar to how a “check in-

- check out" procedure⁷ would occur during in-person instruction. (*general education setting*)
- 30 minutes once per week of small group, synchronous virtual instruction utilizing a Social Emotional Learning (SEL) curriculum with the special education teacher and 5 other students with IEPs (*special education setting*)
- 30 minutes per week of a paraeducator-led virtual social group for a small group of three special education students and three general education students (*general education setting*)

Accommodations & Modifications:

1. Shortened assignments, student specific pacing, frequent breaks and extended time to complete assignments
2. Embedded behavior expectation prompts and priming for difficult tasks
3. Frequent checks for understanding
4. Prior notice of assignments or upcoming changes
5. Use of reinforcement system

Parent Support includes 90 minutes total of parent training by a special education teacher provided as a supplementary aid and service to support the student in making progress in his social emotional goals and with a student specific schedule. Parent training minutes will be provided in three, 30-minute virtual training sessions with follow-up support based on need.

Speech will be provided in one weekly, 30-minute, small-group virtual session with the SLP and two other students with IEPs. (*special education setting*)

Progress monitoring data will be documented and reviewed regularly, via IEP goal progress, provider notes, student grades and work samples, and progress on the adapted online curriculum.

Service Matrix Considerations:

From amended IEP, dated 8/6/2020:

Service Area	Frequency	Location
Math	150 minutes per week	General Ed
Social Emotional	80 minutes per week	General Ed
Social Emotional	225 90 minutes per week	Special Ed
Speech	30 minutes per week	Special Ed
Total instructional minutes per week: 1,665		
Weekly minutes in special ed setting: 120		

SAS	Frequency	Location	Duration
Parent Training ⁸	90 minutes per year	N/A	8/6/2020-9/6/2020

NOTE:

- The total minutes per week of specially designed instruction in the area of social emotional have been amended to differentiate between two locations. While the total number of minutes have been slightly reduced, parent training has been added as a SAS to support social emotional goals across reopening models.

⁷ Center on PBIS [Guidance on Adapting Check-in Check-out \(CICO\) for Distance Learning](#)

⁸ Parent training minutes have been included as a supplementary aids and service in this example because the intent of the parent training is to support the student in accessing general education instruction. IEP teams should consider the purpose of parent training when determining whether it should be provided as a supplementary aids and service or as a related service.

- The location of a **portion** of the social emotional services has changed from special ed to general ed. This shift is to provide more inclusion and provide targeted intervention to support student engagement and decreased maladaptive behaviors across the reopening models.

LRE Calculation:

Bell schedule: 1,665 minutes per week

Kaleb's weekly minutes in special ed setting: 120 (90 Social Emotional + 30 speech)

LRE = (total minutes minus special ed minutes) divided by total minutes times 100

= $(1665-120) \div 1665 \times 100 = 93\%$

LRE Statement from amended IEP, dated 8/6/2020:

Across all reopening models, Kaleb needs intensive social emotional instruction and speech services in a small group to improve his ability to engage in tasks, use strategies to regulate his behavior, and communicate effectively with others. He will receive 90 minutes per week of social emotional instruction plus 30 minutes per week of speech therapy, both in a special education setting. Kaleb will receive his remaining instruction in the general education setting with his non-disabled peers.

Behavior Case Study: SDI in a Hybrid Model

School Plan for Hybrid Learning

Students will follow an alternating schedule to reduce the number of students on campus and in each classroom. Students will report to school two days per week with social distancing procedures in place and will use a virtual platform three days per week. Students will attend in groups of no more than 10 students, minimizing transitions whenever possible. This model will be implemented for selected students starting in November 2020, if permitted by health guidelines.

IEP Team Planning for Kaleb's Access to Hybrid Learning

Starting in November, Kaleb will attend school in person for two days per week, in groups of no more than 10 students.

Math SDI will include:

- 30 minutes, three times per week through adapted online curriculum, with asynchronous support.
- 30 minutes two days per week, in the general education classroom, with a paraeducator.

Social Emotional SDI will include:

- 30 minutes two times per week of small group in-person instruction with all students with IEPs, on how to utilize a student-specific schedule template (*special education location*)
- 10 minutes five times per week of paraeducator support in the general education classroom to support successful schedule use. During three days of distance instruction these occur in a virtual "break out room", and as a "check in-check out procedure" for the two days of in-person instruction. (*general education location*)
- 30 minutes once per week of small group virtual instruction to support social skills and emotional regulation (*special education location*)
- 30 minutes per week of paraeducator lead virtual social groups for small groups with three special education students and three general education students (*general education location*)

Speech will be provided in one weekly, 30-minute, small-group virtual session with the SLP and two other students with IEPs.

Accommodations & Modifications:

1. Shortened assignments, student specific pacing, frequent breaks and extended time to complete assignments
2. Embedded behavior expectation prompts and priming for difficult tasks
3. Frequent checks for understanding
4. Prior notice of assignments or upcoming changes
5. Use of reinforcement system

Parent Support includes 90 minutes total of parent training provided as a supplementary aid and service to support the student in making progress in his social emotional goals and with a student specific schedule. Parent training minutes will be provided by a special education teacher in three, 30-minute virtual training sessions with follow-up support based on need.

Progress monitoring data will be documented and reviewed regularly, via IEP goal progress, provider notes, student grades and work samples, and progress on the adapted online curriculum.

Service Matrix Considerations

N/A – no amendment needed; service matrix dated 8/6/2020 remains in effect.

LRE Calculation

Remains 93% in general education

LRE Statement:

No change from amended IEP, dated 8/6/2020

TRANSITION CASE STUDY

Case Study Background: Tim will be entering into his second year of a half day transition program with 16 students at the start of the 2020-21 school year. Per his annual IEP dated 2/20/2020, he receives the following services under the disability classification of autism.

Service Area	Frequency	Location	Duration
Adaptive	500 minutes per week	General Education (<i>Community</i>)	through 2/19/2021
Adaptive	250 minutes per week	Special Education	through 2/19/2021
Math	90 minutes per week	Special Education	through 2/19/2021
Written Expression	90 minutes per week	Special Education	through 2/19/2021
Speech	30 minutes per week	Special Education	through 2/19/2021
Total instructional minutes per week: 960		Weekly minutes in a special ed setting: 460	
LRE Calculation: 52%			

Supplementary Aids and Services	Frequency	Location	Duration
Adaptive: 1:1 Paraeducator Support	500 minutes per week	General Education	through 2/19/2021
Adaptive: 1:1 Paraeducator Support	250 minutes per week	Special Education	through 2/19/2021

Tim's Present Levels: Tim's local community has experienced an outbreak of COVID-19 in recent weeks and is considering multiple operational models for the start of the 2020-21 school year. His IEP will be amended to plan for FAPE across all reopening models. In spring of 2020, Tim was unable to access his community-based job placement due to facility closure. Additionally, based on parent report, Tim was able to engage in online learning offered during Spring of 2020 when an adult was in the room to prompt how to begin, problem solve barriers and end an activity but was unable to independently engage in the learning opportunities or household tasks. His mother has asked his IEP team for strategies to support Tim be more independent and to problem solve tasks when he doesn't know how to continue.

Transition Case Study: SDI in a Distance Model

School Plan for Distance Learning
Students will participate in a distance/remote model for educational services. This model will be implemented through December 2020 for all students.
IEP Team Planning for Tim's Access to Distance Learning
Tim will participate in a virtual learning model with his transition class.
<p>Adaptive SDI will include:</p> <ul style="list-style-type: none"> 30 minutes two times per week of small group online instruction focused on utilizing student specific schedule in the home environment to complete and self-monitor self-care and household tasks connected to employment and independent living goals. (<i>special education setting</i>) 1:1 paraeducator supports: To support access to online learning, 10 minutes two times daily five times per week of paraeducator support via video conference for utilizing a student specific schedule and self-monitoring checklist. (<i>special education setting</i>) 100 minutes five times per week of individual work in the home environment utilizing a student specific schedule to complete and self-monitor tasks (<i>general education environment</i>) 30 minutes three times per week of small group online instruction related to employment goals

such as: finding information, interviewing, completing applications and job skills. (*special education setting*)

Math SDI will include:

- 30 minutes three times per week of small group online instruction focused on basic math calculation, money skills and financial literacy. (*special education setting*)

Written Expression SDI will include:

- 45 minutes two times per week of small group online instruction focused on completing resumes and applications as well as gathering, creating and updating High School and Beyond Documents (*special education setting*)

Speech will be provided in one weekly, 30-minute, small-group virtual session with the SLP and two other students with IEPs.

Parent Support includes 120 minutes total of parent training provided as a related service to support the student in making progress in his independent living and employment goals and with a student specific schedule and self-management checklist. Parent training will be provided by the special education teacher in four, 30-minute virtual training sessions with follow up support based on need.

Accommodations and Modifications:

1. Shortened assignments, student-specific pacing, frequent breaks, and extended time to complete assignments
2. Assistance with technology
3. Visual aids
4. Frequent checks for understanding, and prompts to utilize student schedule and self-monitoring checklist
5. Use of reinforcement system
6. Use of a timer

Progress monitoring data will be documented and reviewed regularly, via IEP goal progress, provider notes, student grades and work samples, and progress on the adapted online curriculum.

Service Matrix Considerations

From amended IEP, dated 8/6/2020:

Distant Model			
Service Area	Frequency	Location	
Adaptive	500 minutes per week	General Ed	
Adaptive	250 minutes per week	Special Ed	
Math	90 minutes per week	Special Ed	
Writing	90 minutes per week	Special Ed	
Speech	30 minutes per week	Special Ed	
Total instructional minutes per week: 960			
Weekly minutes in special ed setting: 460			
Related Service	Frequency	Location	Duration
Parent Training ⁹	120 minutes per year	N/A	8/6/2020-10/6/2020

⁹ Parent training minutes have been included as a related service in this example because the intent of the parent training is to

NOTE:

- The small group instruction for this student is coded as the special education setting because all peers are special education students.
- The 500 minutes a week in adaptive is coded as the general education setting because this is the same environment learning occurs for general education peers.
- While the service minutes have not changed, an IEP amendment was needed to note changes to paraeducator minute in the hybrid and online model and to add parent training as a related service. Additionally, the IEP amendment includes a triple matrix to reflect the services offered through in-person, online and hybrid models.

LRE Calculation

Bell schedule: 960 minutes per week

Tim's weekly minutes in special ed setting: 460 (250 Adaptive + 90 Math + 90 Writing+ 30 speech)

LRE = (total minutes minus special ed minutes) divided by total minutes times 100

= $(960-460) \div 960 \times 100 = 52\%$

LRE Statement from amended IEP, dated 8/6/2020:

Across all reopening models, Tim will receive targeted and individualized instruction in a half-day, special education transitional program, where he receives SDI in: adaptive, math, written expression, and speech with other special education transition students.

Due to COVID-19 impacts, the community-based job placement facility where the student works is temporarily closed. The IEP matrices detail how Tim will receive his adaptive SDI (500 mpw community job placement) to support the use of a student-specific schedule to complete and self-monitor tasks:

- During distance learning, the 500 minutes per week of community job placement will be in the home.
- In the hybrid model, this SDI will be split between the special education environment for two days (200 minutes per week) and the home environment for 3 days (300 minutes per week).

Transition Case Study: SDI in a Hybrid Model

School Plan for Hybrid Learning

Students will follow an alternating schedule to reduce the number of students on campus and in each classroom. Students will report to school two days per week with social distancing procedures in place and will use a virtual platform three days per week. Students will attend in groups of no more than 10 students, minimizing transitions whenever possible. This model will be implemented for selected students starting in November 2020, if permitted by health guidelines.

IEP Team Planning for Tim's Access to Hybrid Learning

Starting in November, Tim will attend school in person for two days per week, in groups of no more than 10 students.

Adaptive SDI will include:

- 30 minutes two times per week of small group in-person instruction focused on utilizing a student specific schedule in the classroom environment to complete and self-monitor self-care and employment related tasks connected to employment and independent living goals. (*special*

assist the student in benefiting from special education services and to assist the parent in understanding the special needs of their student. IEP teams should consider the purpose of parent training when determining whether it should be provided as a supplementary aids and service or as a related service.

education setting)

- 10 minutes two times daily five times per week of paraeducator support for utilizing a student specific schedule in the home and classroom environment to complete self-care, household and employment tasks connected to employment and independent living goals. *(special education setting)*
- 100 minutes five times per week of individual work utilizing a student specific schedule to complete and self-monitor tasks. *(two days will occur in person in the special education environment and three days will occur in the home which is considered the general education environment)*
- 30 minutes three times per week of small group online instruction related to employment goals such as interviewing, completing applications, budgeting, job skills, working on a resume. *(special education setting)*

Math SDI will include 30 minutes three times per week of small group instruction (one day in person and two days online) focused on basic math calculation, money skills and financial literacy. *(special education setting)*

Written Expression SDI will include 45 minutes two time a week of small group instruction (one day in person and one day online) focused on completing resume and gathering, creating and updating High School and Beyond Documents *(special education setting)*

Speech will be provided in one weekly, 30-minute, small-group virtual session with the SLP and two other students with IEPs.

Parent Support: The specifically designed parent training minutes provided as a related service ended in October of 2020. The special education teacher will continue to check in and support the parents and student to utilize the schedule and self-monitoring template, this support will continue generally as needed to support the student.

Accommodations & Modifications:

1. Shortened assignments, student specific pacing, frequent breaks and extended time to complete assignments
2. Assistance with technology
3. Visual aids
4. Checks for understanding and prompts to utilize student schedule and self-monitoring checklist
5. Use of reinforcement system
6. Use of a timer

Progress monitoring data will be documented and reviewed regularly, via IEP goal progress, provider notes, student grades and work samples, and progress on the adapted online curriculum.

Service Matrix Considerations

The IEP amendment dated 8/6/2020 remains in effect. The portion of the service matrix specific to the hybrid model is referenced below:

Hybrid Model		
Service Area	Frequency	Location
Adaptive ¹⁰	250 450 minutes per week	Special Ed
Adaptive	500 300 minutes per week	General Ed
Math	90 minutes per week	Special Ed
Writing	90 minutes per week	Special Ed
Speech	30 minutes per week	Special Ed
Total instructional minutes per week: 960		Weekly minutes in special ed setting: 660

SAS	Frequency	Location
Adaptive: 1:1 Para-Educator Support ¹¹	260 minutes per week	Special Education

NOTE:

- Some of the SDI minutes for the area of adaptive have shifted to the special education environment in the hybrid model and will be provided in-person. While this changes the LRE calculation for the hybrid model, **the IEP team discussed and agreed that is not a significant change in placement and that a reevaluation was not required and documented this decision in a prior written notice.**
- The IEP team made an intentional decision for the student to receive one day of in-person SDI in the areas of math and written expression so that the student has access to in person support for both content areas. New concepts will be taught during in-person days whenever possible.
- No new amendment was needed to move to a hybrid model because the amendment dated 8/6/2020 included a triple matrix for each of the reopening models.
- In the original IEP dated 2/20/2020 the student received paraeducator support for his adaptive programming. Paraeducator minutes have been added as a supplementary aid and service in the hybrid model to support the student during in person adaptive SDI.

LRE Calculation

Bell schedule: 960 minutes per week

Tim's weekly minutes in special ed setting: 660 (450 Adaptive + 90 Math + 90 Writing+ 30 speech)

LRE = (total minutes minus special ed minutes) divided by total minutes times 100

$$= (960-660) \div 960 \times 100 = 31\%$$

LRE Statement

No change from amended IEP, dated 8/6/2020

¹⁰ The Adaptive SDI minutes provided in the special education setting includes: 60 mpw of small group instruction to utilize a schedule, 100 mpw of paraeducator student schedule support, 200 mpw of individual work in the special education classroom utilizing a schedule to self-monitor and complete tasks and 90 mpw of small group online instruction (60 +100 + 200 + 90 = 450).

¹¹ Notice in the original IEP dated 2/20/2020 Tim receives 1:1 Para-Educator minutes during his adaptive programming. During the hybrid model, paraeducator minutes have been added back in to support independence during independent work in the school environment.

PRESCHOOL CASE STUDY

Case Study Background: Averie is enrolled in a developmental preschool program and receives early childhood special education services in the areas of cognition, communication, social-emotional development, fine motor, and adaptive/self-help. She has an annual IEP due January 8, 2021, noting the following services:

Service Area	Frequency	Location	Duration
Cognitive	160 minutes per week	Special Education	Through 1/8/2021
Communication	20 minutes per week	Special Education	Through 1/8/2021
Adaptive	90 minutes per week	Special Education	Through 1/8/2021
Social-Emotional	180 minutes per week	Special Education	Through 1/8/2021
OT	30 minutes per week	Special Education	Through 1/8/2021
Total instructional minutes per week: 480		Early Childhood LRE Code: 35	

Present Levels Update: Averie’s local community has experienced an outbreak of COVID-19 in recent weeks and is considering multiple operational models for the start of the 2020-21 school year. Her IEP will be amended to plan for FAPE across all reopening models. During winter of 2019, Averie transitioned into a developmental preschool program from an early intervention program, which allowed for 3 months of in-person instruction before her school’s transition to distance learning. Averie’s IEP team has worked very hard to maintain a strong connection to Averie and her family, with weekly check in’s that are centered on Averie, her progress towards IEP goals and the integration of service delivery activities into the family’s daily routines. It was reported by Averie’s family, that she enjoyed the online and offline learning tasks that occurred in the spring but that she was not able to engage for more than 5 minutes at a time and required constant adult supervision. As distance learning persists, the IEP team is working to create a high-quality early learning program that supports Averie’s ability to engage in distance learning in the home environment. Identified priorities include; maintaining regular check ins with Averie’s family to assist the IEP team in the assessment of progress towards her IEP goals, along with the facilitation of parent training to ensure a better understanding of how to better engage Averie in learning tasks in the home environment.

Sample Preschool Schedule: Distance & Hybrid Learning

PreK-ECSE	Mon/Wed Whole Group Engagement	Tues/Thurs SDI Progress Monitoring	Ongoing Staff Priorities:
9:30-9:50	Live Circle Time (whole group)	Live Circle Time (small group skill building & progress monitoring)	Parent Training and Family Conferences
10:00- 10:10	Brain Break!	Brain Break!	IEP & Evaluation Development
10:10- 10:30	Live Social-Adaptive Group (whole group)	Live Social-Adaptive Group (small group skill building & progress monitoring)	IEP Team MDT meetings

PreK-ECSE	Mon/Wed Whole Group Engagement	Tues/Thurs SDI Progress Monitoring	Ongoing Staff Priorities:
10:30- 10:45	Live Closing Circle Time (Adaptive, SE)	Communication (SLP tele-session) T OT (OT tele-session) R	Planning Preparation and Communication

*M/T: AM Session

**W/R: PM Session

ECSE Engagement Tips:

- Offer rapid transitions
- Break out rooms to maintain engagement
- Short chunking of tasks (10 minutes live instruction, 5 minutes off camera)
- Brain breaks: physical movement integrated into live learning opportunities.
- Increased opportunities for students to respond.

Preschool Case Study: SDI in a Distance Model

School Plan for Distance Learning
Students will participate in a distance/remote model for educational services. This model will be implemented through December 2020 for all students.
IEP Team Planning for Averie’s Access to Distance Learning
<p>Cognitive SDI will include:</p> <ul style="list-style-type: none"> • 20 minutes one time per week synchronous large-group activity (math, reading, writing) in collaboration with *classmates (with and *without disabilities), family and special education teacher and/or aide. (special education setting) • 20 minutes one time per week synchronous small group learning session (math, reading, writing) with the special education teacher and classmates (with and *without disabilities). (special education setting) • 15 minutes four times per week through adapted online curriculum (Teaching Strategies Gold) individualized learning activities, and pre-recorded learning sessions (math, reading writing), with asynchronous support designed by the special education teacher in collaboration with family. (special education setting) <p>Communication SDI will include:</p> <ul style="list-style-type: none"> • 10 minutes one time per week synchronously, led by the Speech Therapist, with an individualized focus on articulation, expressive and/or receptive language development to support child in increased engagement in their natural environment (childcare, home, etc.). (special education setting) • 10 minutes one time per week asynchronous individualized learning activities, and pre-recorded learning sessions designed by the Speech Therapist in collaboration with family. (special education setting) <p>Adaptive SDI will include:</p> <ul style="list-style-type: none"> • 10 minutes one time per week synchronous virtual learning (following 1-2 step directions, sequencing) to be embedded in large group instruction led by special education teacher. (<i>special education setting</i>)

- 10 minutes one time per week of synchronous virtual learning embedded in small group learning activity facilitated by special education teacher or Aide. (special education setting)
- 15 minutes 4 times per week asynchronous learning developed by special education teacher, in collaboration with family and individualized to ensure integration into natural environment. (special education setting)

Social-Emotional SDI will include:

- 20 minutes one time per week synchronous virtual learning embedded in large group instruction led by special education teacher (special education setting)
- 20 minutes one time per week of synchronous virtual learning embedded in small group learning activity facilitated by special education teacher or aide. (special education setting)
- 20 minutes 3 times per week asynchronous learning developed by special education teacher, in collaboration with family and individualized to ensure integration into natural environment. (special education setting)

OT services will include:

- 15 minutes one time per week synchronously 1:1 virtual therapy session (ex; Handwriting w/o Tears, task boxes-writing, cutting, snapping, zipping) in collaboration with Occupational Therapist and family. (special education setting)
- 15 minutes one time per week asynchronous learning activities created and shared by OT/COTA in collaboration with family to ensure activities can be integrated into family routine and daily activities. (special education setting)

Accommodations & Modifications:

- Verbal, visual, physical prompts to increase on task behaviors
- Frequent checks for understanding
- Visual schedules with clear expectations for daily routines and transitions
- Extended time to complete tasks
- Additional time to process
- Adult proximity

Parent/Family Supports: Parent training and/or coaching with a special education provider as a supplementary aid and service to support Averie in making progress in her IEP goals with a student specific schedule. Parent training minutes will be provided in three, 30-minute virtual training sessions with follow-up support and added sessions based on need. IEP team program planning with parents occurs biweekly to share ideas and approaches they have developed for teaching content that families could support at home.

Progress monitoring data will be gathered and documented in collaboration with the family and reviewed in family conferences biweekly regarding IEP goal progress, anecdotal notes, work samples, and progress on the adapted online curriculum.

Service Matrix Considerations

From Averie's *amended* IEP, dated 8/6/2020:

Service Area	Frequency	Location
Cognitive	160 100 minutes per week	Special Education
Communication	20 minutes per week	Special Education
Adaptive	90 80 minutes per week	Special Education
Social-Emotional	180 100 minutes per week	Special Education
OT	30 minutes per week	Special Education
SAS	Frequency	Location
Parent training	90 minutes per week	N/A

NOTE:

- Averie's IEP team determined the asynchronous services will be considered a Special Education setting, unless the student ratio described for a Regular Early Childhood Program (50/50 students with disabilities vs. students without disabilities) is met.
- The total number of minutes per week of services changed from a total of 480 minutes in the developmental preschool classroom to 330 minutes through distance learning (including both synchronous instruction with the preschool special education staff and asynchronous learning activities with family support).
- For more information about early childhood LRE, see the [Decision Tree for Coding Early Childhood Educational Environments](#).

LRE Statement

Averie will participate in the developmental preschool program for 330 minutes per week, with specially designed instruction in the areas identified on the Service Matrix, and 90 minutes per month of parent training and/or coaching with a special education provider to support Averie in making progress in her IEP goals with a student specific schedule. Currently, the developmental preschool program is a separate preschool program that enrolls students with disabilities and typical, community-based peers. Averie will have access to same aged peers within small and large group instruction and during free choice activities while participating in Hybrid, Distance, and an In-Person service delivery, when peers are available.

Preschool Case Study: SDI in a Hybrid Model

School Plan for Hybrid Learning

Students will follow an alternating schedule to reduce the number of students on campus and in each classroom. Students will report to school two days per week with social distancing procedures in place and will use a virtual platform two days per week. Students will attend in groups of no more than 10 students, minimizing transitions whenever possible. This model will be implemented for selected students starting in November 2020, if permitted by health guidelines.

IEP Team Planning for Averie's Access to Hybrid Learning

Starting in November, Averie will attend developmental preschool in person for two days per week, in groups of no more than 10 students.

Cognitive SDI will include:

- 20 minutes three times per week (one day online, two day in person) large-group activity (math, reading, writing) in collaboration with classmates, family and special education provider and/or

aide. (special education setting)

- 20 minutes three times per week (one day online, two days in person) small group learning session (math, reading, writing) with the special education teacher and classmates. (special education setting)
- 20 minutes two times per week through adapted online curriculum (Teaching Strategies Gold) individualized learning activities, and pre-recorded learning sessions (math, reading writing), with asynchronous support designed by the special education teacher in collaboration with family. (special education setting)

Communication SDI will include:

- 20 minutes one time per week in person, led by the Speech Therapist, with an individualized focus on articulation, expressive and/or receptive language development to support child in increased engagement in their natural environment (childcare, home, etc.). (special education setting)

Adaptive SDI will include 30 minutes three times per week (one day online, 2 days in person) embedded into large and small group learning activity facilitated by special education teacher or Aide. (special education setting)

Social-Emotional SDI will include:

- 20 minutes three times per week (one day online, two days in person) embedded in large group instruction led by special education teacher (special education setting)
- 20 minutes three times per week of (one day online, two days in person) embedded in small group learning activity facilitated by special education teacher or Aide. (special education setting)
- 15 minutes four times per week asynchronous learning developed by special education teacher, in collaboration with family and individualized to ensure integration into natural environment. (special education setting)

OT services will include 30 minutes one time per week in person therapy session (ex; Handwriting w/o Tears, task boxes-writing, cutting, snapping, zipping) in collaboration with Occupational Therapist. (special education setting)

Accommodations & Modifications:

- Behavior cues of focus
- Frequent checks for understanding
- Visual cues to move through a routine
- Extended time to complete projects
- Additional time to process
- Use of reinforcement system
- Adult proximity

Parent/Family Supports: Parent training and/or coaching with a special education provider as a supplementary aid and service to support Averie in making progress in her IEP goals with a student specific schedule. Parent training minutes will be provided in three, 30-minute virtual training sessions with follow-up support and added sessions based on need. IEP team program planning with parents occurs biweekly to share ideas and approaches they have developed for teaching content that families could support at home.

Progress monitoring: data will be gathered and documented in collaboration with the family and reviewed in family conferences biweekly regarding IEP goal progress, anecdotal notes, work samples, and progress on the adapted online curriculum.

Service Matrix Considerations

Averie's IEP amendment dated 8/6/2020 remains in effect. The portion of the service matrix specific to hybrid learning is referenced below:

Service Area	Frequency	Location
Cognitive	160 minutes per week	Special Education
Communication	20 minutes per week	Special Education
Adaptive	90 minutes per week	Special Education
Social-Emotional	180 minutes per week	Special Education
OT	30 minutes per week	Special Education

SAS	Frequency	Location
Parent training	90 minutes per month	N/A

NOTE:

- Averie's IEP team determined the asynchronous services will consider a special education setting, unless the student ratio described for a Regular Early Childhood Program (50/50 students with disabilities vs. students without disabilities) is met.
- For more information about early childhood LRE, see the [Decision Tree for Coding Early Childhood Educational Environments](#).

LRE Statement

Averie will participate in the developmental preschool program for 480 minutes per week, with specially designed instruction in the areas identified on the Service Matrix, and 90 minutes per month of parent training and/or coaching with a special education provider to support Averie in making progress in her IEP goals with a student specific schedule. Currently, the developmental preschool program is a separate preschool program that enrolls students with disabilities and typical, community-based peers. Averie will have access to same aged peers within small and large group instruction and during free choice activities while participating in Hybrid, Distance, and an In-Person service delivery, when peers are available.

APPENDIX: FREQUENTLY ASKED QUESTIONS ABOUT LRE ACROSS REOPENING MODELS

LRE/Settings¹²

- 1. My district is using the same online reading program for all students. My reading groups only include students with disabilities, and the content of the program is adjusted for their needs. When my students with disabilities are accessing the adapted online program during asynchronous instruction, is this considered a general education setting?**

Yes. Setting is determined by the level of access to the peer group. In situations where students across a school or district are participating in a distance learning model, the home is the setting from which all or most students are accessing their instruction. Therefore, asynchronous learning in the student's home is typically considered a general education setting. Also, in this scenario, the online reading program is accessed by both students with and without disabilities.

- 2. What is the setting for students with IEPs accessing asynchronous learning on software only used by other students with IEPs?**

This would be considered a special education setting. Although asynchronous learning in the home through a distance or hybrid model is typically considered a general education setting, in this scenario, the peer group only includes students with IEPs, and any follow-up instruction would only include other students with IEPs.

- 3. What is the setting for students with IEPs engaging in asynchronous learning using materials created by a special educator and sent to the student's home?**

Typically, when all or most students across a school or district are engaging in a distance learning model, asynchronous learning in the home is considered a general education setting. There are, however, exceptions. A paper-based activity or pre-recorded video lesson only intended for access by, and further discussion with, students with IEPs might be considered a special education setting by the IEP team.

- 4. Are all synchronous online (e.g., Zoom) meetings considered general education settings?**

Not necessarily. The setting for synchronous instruction, whether in person or through distance learning, is determined by the make-up of the student group that is participating. Here are some considerations:

- Similar to in-person instruction in a school building, a Zoom meeting would be considered a special education setting if more than 50% of the group included students with IEPs.
- A ratio of exactly 50% students with IEPs and 50% students without IEPs on a Zoom session would be considered a general education setting.
- Some students may be participating in online meetings while in an in-person school setting. For example, three students with IEPs are receiving SDI for behavior in the school building while

¹² Considerations for what is considered general education are addressed in D-7 of the [OSPI Special Education COVID Q&A](#).

they access their online general education content via Zoom. Because they are interacting with at least 50% non-disabled peers (factoring in both in-person and Zoom learning environments), this would be considered a general education setting.

- A 1:1 Zoom with a student with an IEP would be considered a special education setting.

Specially Designed Instruction (SDI) & Related Services

5. Do services or instruction need to be synchronous in order to be considered SDI?

Not necessarily. Time spent engaged in asynchronous learning activities can be counted as service minutes if the activities meet the definition of SDI.

- SDI means adapting the content, methodology, or delivery of instruction to meet the unique needs of the student resulting from the disability, to ensure access to general curriculum and to meet educational standards.
- SDI must be provided by appropriately qualified staff. Other staff, including general education teachers and paraeducators, may assist in the provision of SDI as long as the SDI is designed and supervised, and the student's progress monitored and evaluated, by a certificated special education staff.
- SDI can be provided in a general education setting or a special education setting across reopening models, through synchronous or asynchronous delivery.

6. I am teaching in a high school that uses block scheduling. Can districts decide to provide one type of service (e.g., math) for six weeks and then switch to another type (e.g., English language arts) for the next six weeks? How should this be documented on the IEP service matrix?

Before deciding to provide services on a rotating basis, the following should be considered¹³:

- Services should reflect the unique needs of the student and not the school schedule.
 - How will these decisions be made and documented on a case-by-case basis, rather than a standard, "blanket" offer?
 - What is the process for providing uninterrupted services across these schedule rotations, when the IEP team determines it is necessary?
 - How will related services such as speech and motor therapy continue to be provided?
- Gaps in services may result in regression and result in a need for extended school year (ESY) services and/or recovery services.
 - How will the IEP team consider whether the gap in services may lead to regression?
 - What progress data will be collected, and how often, to support the IEP team with monitoring these processes to prevent regression?

With regard to documenting services in the IEP, the regulations do not require a specific format for documenting the frequency of services; that would be an IEP team decision. Services should be documented in a manner that enables the parents and all individuals implementing the IEP to understand the services that will be provided. While identifying weekly minutes is common, there are also cases where it may make more sense to note services provided monthly or in another format. There can also be separate matrices to show changes in service delivery over time.

¹³ This question is addressed in A-1A of the [OSPI Special Education COVID Q&A](#).

Parent/Family Training & Support

7. When and how should parent/family training and support be documented in the IEP?

Families may need help to support student learning across reopening models, and these generalized supports would not be documented in an IEP. These could include topics such as how to set up a learning environment or how to use the learning platform selected by the district.

Individualized parent/family training and support might also be documented in the IEP. IEP teams should consider the purpose of parent training when determining whether it will be provided as a related service or a supplementary aid and service (SAS).

- Related services are intended to support the student with benefiting from special education. Parent training can be part of a district's offer of FAPE to address barriers to learning in the home environment and support student progress toward annual IEP goals and objectives.
- SAS are services and supports intended to allow a student to access general education. If the intent of the parent training is to support the student in accessing general education instruction, those minutes could be documented as SAS. This might include topics such as how to utilize a student-specific schedule template or how to use positive behavior supports during asynchronous learning activities.

8. Can parents be required to participate in training?

Although parents cannot be required to participate in district-offered training, IEP teams should identify individual family needs and offer supports when appropriate. Learning in the home is new for many students, families, and educators. For some students, this may require parent/family training to support learning in the home.

9. Is a reevaluation required to add parent/family training as a related service or a supplementary aid and service?

As described in question 7 above, parent training or counseling is considered to be a related service if the primary goal of the service is to assist the student in benefiting from their specially designed instruction (SDI). It would be considered a supplementary aid and service (SAS) if the primary goal was to assist the student in accessing the general education instruction to the maximum extent possible. The decision to add individualized parent training or counseling, which is not a direct service to the student, is typically an IEP team decision, and would generally not require a reevaluation to support the addition of the service.

IEPs and IEP Amendments

10. All of the case studies included in this resource document required at least one IEP amendment at the start of distance learning. Does this mean that IEP amendments are required every time the reopening model changes?

Not necessarily. When a student's services (e.g., service areas, minutes per week, and location/setting (i.e., special education or general education)) remain the same across reopening models, an IEP amendment may not be required. Online or in person instruction, and synchronous or asynchronous

instruction are generally considered instructional models and do not need to be documented in an IEP. Talk with your district leadership about local decisions regarding the IEP amendment process.

11. Is an IEP amendment required anytime a student's number of service minutes change?

There is no distinction in the regulations about minimal changes versus larger changes to the offer of a Free and Appropriate Public Education (FAPE). The IEP should reflect the anticipated frequency, location, and duration of services. If the student's services (e.g., service areas, minutes per week, and special education or general education location/setting) are changing, an IEP amendment is required. See question D-1 of the [OSPI Special Education COVID Q&A](#) for additional considerations regarding IEP amendments.

12. I work with a student who receives special education and related services in a special education setting for the majority of the day. During distance learning, even with synchronous and asynchronous supports, the student is receiving fewer minutes per week of services. Can the service matrix and LRE calculation be updated through an IEP amendment, or is this a significant change in placement, requiring a reevaluation?

If the only reason that LRE calculation is changing due to a change in learning models because of health and safety requirements, a reevaluation may not be needed. The IEP team should consider if a reevaluation is warranted for individual students whose needs may have changed as a result of the student's disability, creating a potential need for significantly more or less services. Or, the team may determine that a reevaluation is needed in order to gather current information to help develop the IEP. Ultimately, it would be a team decision whether a reevaluation was needed – it would not just be a blanket requirement for all students transitioning to distance, hybrid or in-person services.

If the team determines that a reevaluation is necessary, then it could be completed through a review of existing data or additional testing (which may be able to be completed remotely). See [additional information](#) on testing during COVID from WSASP.

13. Can a Prior Written Notice (PWN) be used to document changes in services instead of an IEP amendment?

No. The IEP is the offer of FAPE, and the purpose of prior written notice is to inform the parent of a decision proposing or refusing to change the identification, evaluation, educational placement or the provision of FAPE to the student. When the IEP team agrees to change a student's services, those changes must be reflected in the IEP. A PWN must then be provided to document the decision process within a reasonable time prior to implementation of the change in services. See questions D-2 and H-1 of the [OSPI Special Education COVID Q&A](#) for additional considerations regarding PWNs.