

Questions & Answers:

Meeting Requirements During the IEPOnline 3.0 Migration

At the start of the 2026–27 school year, Washington school districts using IEPOnline through the Washington School Information Processing Cooperative (WSIPC) and their vendor Public Consulting Group (PCG) transitioned from version 2.0 to version 3.0. During this transition, users have identified questions and challenges with system functions and processes. OSPI is monitoring issues reported by districts and communicating with the organizations supporting IEPOnline.

We appreciate the significant efforts of districts to support students, families, and educators during this transition, and we understand the additional time, workload, and uncertainty these challenges have created for special education teams. Special education leaders and staff across Washington have shared questions, identified solutions, developed temporary processes, supported one another, and kept OSPI informed about what they are experiencing. We are grateful for that partnership and for the care, persistence, and creativity they are bringing to this work.

This resource is intended to help districts address immediate needs while system issues are being addressed. It focuses on federal and state special education requirements and provides platform-neutral options and temporary approaches that districts may use when needed.

Federal and state special education requirements remain in effect, and OSPI does not have authority to waive those requirements. **We also recognize teams are managing many issues at once and that some issues require more immediate attention than others.** This resource is designed to help teams maintain services for students, complete time-sensitive processes, sustain funding, and support accurate reporting while system issues are addressed.

The questions and answers are organized into the following sections:

- A. [Alternative Documentation and Paper Processes](#)
- B. [State/Federal Reporting and Student Count](#)
- C. [Safety Net and Downstream Processes](#)
- D. [Family Communication](#)
- E. [Student Transfers](#)
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- G. [IEP Amendments and Evaluations](#)
- H. [Progress Reporting](#)
- I. [Historical Records and Access](#)
- J. [Monitoring and Dispute Resolution](#)

Districts should continue to use established support channels for questions about IEPOnline functionality and technical support: customersupport@pcgus.com or [\(800\) 356-8040 ext. 4](tel:8003568040).



Continue to report system issues through [PCG](#) and [WSIPC](#) so concerns can be documented, tracked, and addressed.

Districts are also encouraged to connect with special education directors at their regional Educational Service District (ESD) and with special education peers in other districts. [WA-CASE](#) and OSPI's [Special Education Directory](#) can help districts connect with colleagues across the state.

This resource, current as of **September 15, 2026**, will be updated as additional questions and information become available. If you have questions about this resource or special education requirements, please contact the OSPI Special Education division at speced@k12.wa.us or 360-725-6075.

How to Use This Resource

Sections B-J of this document reference short-term alternative documentation and paper processes. Please refer back to section **A. Alternative Documentation and Paper Processes** for full guidance and specific details on this topic.

A. Alternative Documentation and Paper Processes

A1. May a district use OSPI's model forms or another alternative method when the electronic IEP system cannot support a required special education process?

Yes. IDEA and WAC establish the required content and process, but do not require districts to use a particular electronic IEP system. If the system cannot adequately support a required process, districts may use [OSPI's model forms](#) or another alternative method that captures all required information.

An alternative method does not need to be a new electronic system or a formal districtwide process. Depending on the need, it may be as simple as using an OSPI model form, securely maintaining a document in an existing district file or electronic location, or temporarily using a paper special education file. The goal is to use a practical, temporary method that allows the required work to continue and the information to remain accurate, accessible, and confidential until it can be reconciled with the electronic system.

A district may temporarily use paper forms when the electronic system does not provide the functionality needed to complete, amend, or document the IEP in a timely and compliant way. Districts must continue to meet applicable timelines and ensure that services are provided in accordance with the student's IEP.

A2. If a district uses a temporary paper or alternative process, how should the district maintain the record and document the date the action occurred?

The district must ensure that the student's educational records remain accurate and accessible regardless of the documentation method used. Until the electronic system is available, the short-term alternative documentation should be maintained as part of the student's official special education record, and districts should ensure that staff responsible for implementation have access to the necessary information.

The date a document or action is entered into the electronic IEP system does not necessarily determine the date the action occurred. When a short-term alternative method is used because of a system limitation, the date of the underlying action should be established based on the actual date the action occurred or was received, as applicable. Districts should maintain ongoing documentation of required activities completed while a system issue is occurring rather than relying on staff to reconstruct events from memory after the system is restored.

When system functionality becomes available, districts must enter, upload, or otherwise reconcile the information in the electronic system consistent with district procedures so that the student's record accurately reflects the completed process.

A3. How should districts ensure staff can access IEP information when an electronic system issue affects access?

Districts must ensure that the complete, current IEP is available and accessible to all staff responsible for implementation. This may include notifying staff where supplemental or paper documentation is stored and ensuring staff understand which version of the IEP or which alternative documents reflect the current IEP.

Any alternative method should protect the confidentiality of student information and limit access to authorized staff with a legitimate educational interest. When system functionality is restored, districts should reconcile or restore the information in the electronic system so that the student's record accurately reflects the current IEP.

A4. How should districts provide families with a complete copy of the IEP when information is documented in more than one place?

The district must provide the parent with a complete copy of the student's IEP, including any supplemental or temporary documentation that forms part of the IEP. Families should not have to piece together incomplete records or rely on a system-generated document that omits required information. Districts should proactively communicate with families about the IEP system challenges and explain why the supplemental or temporary documentation that forms

part of the IEP may look different than expected and explain what documentation constitutes the IEP as needed.

B. State/Federal Reporting and Student Count

B1. What should districts do if they cannot verify the accuracy of special education data generated by the electronic IEP system for state and federal reporting?

Districts must not rely solely on system-generated data they cannot verify. They should reconcile information against district records, including current or archived IEPs, enrollment, evaluations, service documentation, and other sources, to confirm accuracy before submitting required state or federal reports. If system limitations prevent verification through the electronic IEP system, districts should use an appropriate alternative method to verify and document the information. See A1 for examples of temporary alternative methods when an electronic system cannot support a required process.

Districts should contact OSPI when system issues affect their ability to complete required reporting so that OSPI can help identify appropriate workarounds, provide guidance on the specific issue, and discuss a potential extension when needed.

B2. What should a district do if a system or data integration is not functioning before a required state reporting deadline?

Districts remain responsible for submitting accurate data by required deadlines, even when a system or data integration is not functioning as expected. Districts should use an appropriate alternative process to establish accurate reporting information and document the steps taken to verify the data. See A1 for examples of temporary alternative methods and A2 for guidance on maintaining documentation created through a temporary process. Districts should also document relevant system issues and communications with the vendor or other support entity. If the system issue may prevent the district from meeting a reporting deadline, the district should contact OSPI as soon as possible to discuss available workarounds, potential alternate submission method(s), guidance specific to the issue, and whether an extension may be appropriate.

B3. What should districts do if IEP system issues affect the accuracy of data needed for the November federal child count?

Districts should use other reliable sources to verify the data needed for child count reporting, including information available in the student information system (SIS), enrollment records, IEP records, and service provider records or caseload lists. Key data elements may include students

receiving special education services, disability category, placement, age, and entry and exit dates.

When data normally flows from the IEP system to the SIS and then to CEDARS, districts should verify the information available in the SIS and determine whether affected data can be manually updated or maintained there. If the accuracy of the SIS data is uncertain, districts may create an independent list of students receiving special education services using enrollment records and service provider caseload information and compare that list against the SIS.

Districts may also need to manually review or reconcile student records, including archived IEPs, to establish whether a current IEP and evaluation were in place on the applicable count date. Districts should document the process used to verify the data and establish the final count.

B4. What should districts do if IEP system issues affect data used for federal indicators or other special education performance reporting?

Districts should identify reporting requirements that rely on information generated through the IEP process and establish an alternative method for tracking and verifying the required data. This may include data related to timely initial evaluations, Part C to Part B transition, secondary transition, early childhood outcomes, discipline, and exit reporting.

For affected data, districts may use a manual tracking process to record the required information and verify it against other reliable district records. Districts should ensure that verified information is accurately reflected in the SIS and submitted through CEDARS or other applicable reporting systems. When system functionality is restored, districts should reconcile manually maintained information with the electronic records to ensure that the final data are accurate.

Districts should document the process used to track, verify, and reconcile the data and contact OSPI if system issues affect the district's ability to meet a reporting requirement or deadline. See A1 for examples of temporary alternative methods and A2 for guidance on maintaining documentation created through a temporary process.

B5. What should districts do to ensure data remain accurate after an IEP system issue is resolved?

Districts should not assume that restoring system functionality will automatically restore data accuracy. After system functionality is restored, districts should establish a process to reconcile affected records and verify that data entered, re-entered, restored, or batch-uploaded in the IEP system are consistent with other authoritative district records. When information in the electronic system conflicts with other reliable district records, districts should investigate and resolve the discrepancy rather than assume that the electronic system is accurate. Districts should use the information supported by the applicable records and document significant corrections and reconciliation activities.

Districts should review system audit logs or history, when available, and conduct validation checks to identify discrepancies. Particular attention should be given to records that were manually entered or corrected in another system during the system issue, as restored or outdated IEP system data may subsequently overwrite those records. Districts should consider a secondary review of affected data before major state or federal submissions and document significant corrections and the process used to validate the data.

Districts should contact OSPI if they identify discrepancies they cannot resolve or if system recovery creates questions about how data should be reported.

B6. What should districts do if IEP system issues may affect funding or other reporting that relies on special education data?

Districts should identify state and federal reports that rely on special education data and determine how accurate information will be established if the IEP system cannot provide the required data. For each affected report, districts should identify an alternative process for producing and verifying the required information using reliable district records.

As part of this process, districts should identify the specific data elements needed for affected reports or funding calculations and establish a way to track and verify that information while system functionality is unavailable. See A1 for examples of temporary alternative methods and A2 for guidance on maintaining and later reconciling records created through a temporary process.

If a system issue may affect a required report, funding calculation, audit requirement, or reporting deadline, districts should contact OSPI as soon as possible to discuss the specific issue, available workarounds, and whether an extension or other reporting option may be appropriate.

B7. What should districts do if an electronic system limitation affects the accuracy of monthly enrollment reporting (P-223H)?

Districts should not rely solely on system-generated data that may be inaccurate due to a system outage or other system limitations. Districts should use other reliable records to verify the information, such as current or archived IEPs, evaluations, enrollment records, service documentation, or other available district records. Districts may need to manually review student records to confirm which students had a current IEP and evaluation in place on the applicable count date.

If the system issue affects a reported count, districts should correct the reported information to accurately reflect the students who met the applicable requirements as of the count date. For 2026–27 enrollment reporting, districts may revise their counts through November 22, 2027, **provided the student had a current IEP and evaluation in place as of the applicable count**

date. Districts should contact OSPI if they have questions about how to verify or report information affected by the system issue.

B8. What documentation should districts maintain when using an alternative process to establish an accurate student count?

Districts should maintain sufficient documentation to demonstrate how the student count was determined. This may include the records reviewed, the reconciliation or verification process used, any system limitations that affected the data, and the method used to establish the final count. Districts should also retain relevant communications or system support tickets when they help document the system issue or the steps taken to resolve it.

C. Safety Net and Downstream Processes

C1. What should districts do if an electronic IEP system issue prevents them from accessing documentation needed for a Safety Net application?

Districts should identify students who may be included in a Safety Net application and verify that the documentation needed to support each application is accessible and complete. At a minimum, districts should be able to demonstrate the relationship between the student's IEP, the special education and related services required by the IEP, the services provided, and the costs associated with providing those services.

If a finalized IEP, amendment, or other required documentation cannot be retrieved from the electronic IEP system, districts should use another reliable source or method to obtain and maintain the documentation. This may include securely retained copies of finalized IEPs and amendments, prior written notices, service documentation, or other records that support the information reported in the application. Districts should not alter or recreate historical IEP documentation solely because of a system limitation.

Districts should also maintain documentation explaining any significant system-related limitation and the steps taken to obtain or verify the required records. If different records contain inconsistent information, districts should investigate the discrepancy and determine which information is supported by the most reliable available records. Districts should retain documentation showing how the information was verified or reconciled. Districts should not alter or recreate historical IEP documentation solely to resolve inconsistencies between records.

C2. How should districts document services when the electronic IEP system cannot reliably provide information about the services required or provided?

When the electronic IEP system cannot provide accurate or accessible service information, districts should use a temporary alternative method consistent with A1 and A2 to track and verify services. The district should maintain sufficient documentation to demonstrate what services were required by the student's IEP and the relationship between those services, staffing, and actual costs.

Depending on the circumstances, districts may need to retain or compile:

- service logs or other documentation of services provided;
- provider schedules and caseload information;
- staffing assignments and other records showing which staff provided services;
- documentation of related services or contracted services;
- information from the student's current IEP and amendments; and
- financial records that connect staffing or contracted service costs to the student's educational program.

Districts should reconcile this information against the student's IEP, applicable amendments, and other reliable records rather than relying solely on system-generated service information that may have been affected by the system issue. If discrepancies are identified, districts should document the reconciliation process, retain the records supporting the determination, and clearly identify any information that was reconstructed from available documentation.

C3. How should districts prepare for a Safety Net application when an electronic IEP system has been unreliable?

Districts should take steps early to ensure that documentation needed for a Safety Net application can be located, verified, and connected to the student's educational program.

Districts should:

1. **Identify potentially eligible students early.** Districts may begin with students included on prior-year Safety Net applications, when applicable, and update the list based on current information.
2. **Review documentation for each student.** Confirm that finalized IEPs, amendments, service information, and other records needed to support the application are accessible. If the electronic IEP system cannot generate or display information accurately, see A1 and A2 for temporary alternative methods for obtaining and maintaining required documentation. Any discrepancies identified during the review should be resolved using the most reliable available records and documented before the application is submitted.

3. **Preserve service documentation.** Maintain service logs, schedules, caseload information, staffing assignments, and other records needed to demonstrate that the services were required and provided.
4. **Maintain financial documentation.** Ensure that staffing and contracted-service costs can be connected to the student's educational program. This may require coordination with the district business office to obtain contracts, purchase orders, invoices, expenditure records, or other supporting financial documentation.
5. **Designate responsibility for the application.** Identify a staff member responsible for coordinating the Safety Net application and ensuring that information entered into EGMS is consistently calculated, supported, and verified for each student.
6. **Maintain student-level documentation.** Establish a secure, organized location for documentation associated with each anticipated Safety Net student, consistent with district records-retention and confidentiality requirements.
7. **Document mitigation efforts.** Maintain a record of significant system limitations, alternative methods used to obtain or verify information, and communications with the vendor or OSPI when those issues affect the district's ability to substantiate an application.

The purpose of these steps is to ensure that the district can substantiate the information reported in its Safety Net application, including the applicable IEP requirements, services provided, and costs associated with the student's educational program.

C4. What should districts do when system limitations affect information used for Medicaid billing or other programs outside special education?

Districts should coordinate with the program area responsible for the billing and reporting process, verify information against the official special education record, and maintain documentation of any system limitation and alternative process used. Districts are responsible for ensuring that information used for billing or other program-specific reporting is accurate and supported by appropriate records. Requirements specific to Medicaid billing or other programs should be addressed with the appropriate program authority.

D. Family Communication

D1. What should districts do if an electronic system issue affects their ability to provide required information or communications to parents or families, including obtaining or documenting required consent or agreement?

Districts should use another reliable method to provide required information or communications within applicable timelines and document that the information was provided. Alternative

methods may include other electronic communication, mail, telephone, or another method appropriate to the circumstances. The alternative method should be consistent with applicable requirements regarding communication, language, accessibility, and confidentiality.

When an electronic IEP system cannot capture or document required parent consent or agreement, districts should use a temporary alternative method consistent with A1 and A2 to obtain and document the consent or agreement and the information relevant to the decision. Districts should distinguish between requirements for written consent and requirements for parent agreement, as the applicable documentation requirements may differ depending on the action being taken.

Districts should maintain documentation of the communication, consent, or agreement as part of the student's record and enter or reconcile the information in the electronic system when functionality allows. If a system issue may affect the district's ability to meet an applicable timeline, the district should contact OSPI as soon as possible to discuss available options.

D2. What should districts do if an electronic IEP system cannot capture or document required parent consent or agreement?

Districts should use a short-term appropriate alternative method to obtain and document required parent consent or agreement when the electronic IEP system cannot support the process. The alternative method should clearly document the parent's consent or agreement and the information relevant to the decision. Districts should maintain the documentation as part of the student's record and enter or reconcile the information in the electronic system when functionality allows. See A1 for examples of temporary alternative methods and A2 for guidance on maintaining documentation created through a temporary process.

Districts should distinguish between requirements for **written consent** and requirements for **parent agreement**, as the applicable documentation requirements may differ depending on the action being taken. Consent is required for initial evaluations, reevaluations, for initial provision of special education and related services, for the use of an emergency response protocol, and for the release of records. For additional information about when written parental consent is required, see [WAC 392-172A-01040](#), [WAC 392-172A-03000](#), [WAC 392-172A-02105](#), and [WAC 392-172A-05225](#).

E. Student Transfers

E1. What are a district's responsibilities when a student with an IEP transfers in and complete records are not available through the electronic system?

The district remains responsible for ensuring the student receives special education and related services without unnecessary delay, including comparable services until the district conducts an evaluation, if necessary, and develops and implements an IEP. [WAC 392-172A-03105](#). If complete records are not available through the electronic system, the district must use other available records and contact the previous district directly to obtain the IEP, evaluation, and related documents. The district should also communicate with the student's family regarding records and discuss comparable services. The temporary unavailability of records through an electronic system does not relieve the district of its responsibility to provide a free appropriate public education (FAPE), including comparable services, while additional records are obtained.

E2. How should a district determine and provide comparable services when transfer information is incomplete or unavailable?

When a student transfers into a district, the district must provide comparable services until the district conducts an evaluation, if necessary, and develops and implements an IEP. [WAC 392-172A-03105](#). The district must use the best available information, including records from the parent, previous district, or other district files, to determine and provide comparable services while complete records are obtained. The district may want to meet with or discuss comparable services with the parents, and/or with the previous district team, if there are delays in obtaining records or gaps in records received. The district should document the comparable services provided, information used, and any steps taken to resolve missing or incomplete records.

E3. May districts obtain IEP and evaluation records directly from the previous district when electronic transfer functionality is unavailable?

Yes. If electronic transfer functionality is unavailable or incomplete, districts should use direct communication with the previous district to obtain needed IEP and evaluation records. The temporary unavailability of an electronic transfer process does not prevent districts from using other appropriate methods to obtain records.

If districts are having challenges getting records from another district, OSPI recommends reaching out to the educational service district (ESD) or OSPI for support in connecting with other districts.

E4. What should a district document when using an alternative process to obtain records or establish comparable services?

The district should document the records requested and received, contacts with the previous district or parent, the information used to determine comparable services, and how staff were informed of the services to be implemented. [WAC 392-172A-03105](#) requires the new district the student enrolls in to take reasonable steps to promptly obtain the student's records, including the IEP and supporting documents and any other records relating to the provision of special education or related services to the student, from the school district in which the student was previously enrolled; and for the previous district to take reasonable steps to promptly respond to the request from the new school district. See A2 for guidance on maintaining documentation created through a temporary process.

F. IEP Content and Services

F1. What should a district do if its electronic IEP system does not include a service, supplementary aid, accommodation, secondary transition component, or other options the IEP team determines a student's needs?

We recognize that there may be temporary and unanticipated situations in which a district's IEP system or process does not provide a field or functionality that adequately captures information required by IDEA and WAC, including required secondary transition components such as the Course of Study. When this occurs, districts may need to use other available locations within the IEP or temporary alternative documentation methods when a system field, code, or functionality is not currently available. [WAC 392-172A-03090\(2\)\(b\)](#) does not require an IEP team to include information under one component of an IEP when that information is already contained under another component. Accordingly, when required information can be clearly documented elsewhere within the IEP, districts may use another appropriate location rather than delaying completion of the IEP because a particular field or functionality is unavailable.

Where the system does not provide an available method to adequately document required information, districts may use a temporary alternative method, including OSPI's model IEP forms or, when necessary, a paper process. The priority is to ensure that the IEP team can complete the required process, clearly document its decisions, provide the IEP to the parent, and ensure that staff responsible for implementation have access to the information they need.

We recognize that these temporary approaches may create additional work for districts at an already demanding time of year, and we appreciate the care districts are taking to maintain continuity of services for students while system issues are being addressed.

F2. Should a student's IEP be changed to fit IEP system or functionality?

No. A limitation or change in an electronic IEP system or IEP process does not change IDEA or WAC requirements that services be based on student need and should not require an IEP team to revise services solely to fit the system. Services must continue to be based on the student's individual needs and the IEP team's decisions. If the system cannot accurately document the IEP team's decisions, districts should use the temporary alternative methods described in A1 and A2 to ensure that the required information is clearly documented and implemented. [WAC 392-172A-03090](#) requires that the IEP include services and supports determined necessary for the student and does not require the use of a particular electronic system.

F3. Can required IEP information be documented in another section of the IEP when the expected field or location is unavailable?

Yes. When required information can be clearly documented elsewhere within the IEP, districts may use another appropriate location in the IEP rather than delaying completion of the IEP because a particular field or functionality is unavailable. [WAC 392-172A-03090\(2\)\(b\)](#) does not require an IEP team to include information under one component of an IEP when that information is already contained under another component. The priority is to ensure that all required IEP content is clearly documented and accessible to those responsible for implementing the IEP.

F4. What should a district do if migrated IEP information is incomplete or differs from the student's current IEP?

The district must use the student's current, finalized IEP and other official special education records as the official record of information, and not rely on incomplete or inaccurate migrated data. If migrated information does not accurately reflect the student's current IEP, the district should use other available system fields, supplemental documentation (such as a prior written notice), or a temporary alternative process to ensure that the student's services, supports, and other required IEP content are accurately documented and implemented. See A1 and A2 for guidance on temporary alternative documentation and maintaining records created through a temporary process. The priority is to ensure that the student's current IEP and the decisions of the IEP team are accurately reflected in the student's educational record and implemented as written. [WAC 392-172A-03090](#) requires the IEP to include the services and supports determined by the IEP team.

F5. What should a district do if the system calculates or displays service minutes differently from the current IEP?

The district must use the student's current, finalized IEP as the official record of information when determining the services to be provided. If the system display or calculation is not accurate, the district should document the correct service minutes and maintain documentation

explaining the discrepancy and ensure staff have access to the correct service information for implementation. The district should use other available system fields, supplemental documentation (such as a prior written notice), or a temporary alternative process to ensure that the student's service minutes are accurately documented and implemented. See A1 and A2 for additional guidance on temporary alternative methods and maintaining documentation created through a temporary process.

G. IEP Amendments and Evaluations

G1. What options are available when the electronic IEP system does not allow a district to complete an IEP amendment as intended?

The district may use another available location in the system, supplemental documentation (such as a prior written notice), [OSPI's model forms](#), or a temporary paper process to document the amendment. The selected approach should clearly identify the amendment, reflect the IEP team's decision-making process, and be provided to the parent and staff responsible for implementation. See A1 and A2 for additional guidance on temporary alternative methods and maintaining documentation created through a temporary process.

G2. Does a system limitation require an IEP team to hold a new meeting or make substantive IEP changes?

No. A system limitation does not, by itself, require a new IEP meeting or substantive IEP changes. If the district is using short-term alternative methods (such as other available locations in the system, OSPI model forms, prior written notice, or other supplemental documentation) to accurately document the existing IEP, an IEP team meeting is not required solely because of the system limitation. In addition, if the district uses another document or method to accurately document implementation of the existing IEP, that does not by itself constitute an IEP amendment or require an IEP meeting. If the district is actually changing the content of the IEP, the applicable IEP amendment procedures must be followed. A system limitation does not provide a basis for making changes to an IEP's content outside of the required process. See A1 and A2 for additional guidance on temporary alternative methods and maintaining and later reconciling documentation created through a temporary process.

G3. May a district temporarily document an IEP amendment outside the electronic IEP system?

Yes. When the electronic system cannot support the amendment process, a district may temporarily document the amendment outside the system, provided the documentation is maintained as part of the student's IEP record, shared with the parent, and accessible to staff who are responsible for implementation. Districts could use a prior written notice or other methods, such as [OSPI's model forms](#) or a temporary paper process to document the

amendment and document that the IEP in the electronic IEP system will be updated at a later time. This may also include required documentation, such as a Summary of Performance, when the electronic system does not provide a workable method to complete the documentation without initiating an unnecessary IEP amendment. See A1 and A2 for additional guidance on temporary alternative methods and maintaining and later reconciling documentation created through a temporary process.

G4. What should districts do when an electronic system issue affects the ability to complete an evaluation or annual IEP?

Districts must ensure that required reevaluation and annual IEP processes are completed within applicable timelines. When an electronic system issue prevents a district from completing or documenting a required process within the system, districts may use a temporary alternative method consistent with A1 and A2.

A system limitation does not, by itself, provide a basis for determining that a reevaluation is unnecessary. Reevaluation decisions must be made on an individual student basis in accordance with applicable requirements. If the electronic system limits access to existing data, districts should use other available records to provide the evaluation group with the information needed to make the determination and should document the information considered.

The district must document the process used and ensure required decisions are captured. When system functionality becomes available, the district should enter or reconcile information in the electronic system so that the student's record accurately reflects the completed process.

G5. What should districts do if an electronic system issue prevents staff or parents from using the district's usual special education referral process?

A system limitation does not eliminate the district's Child Find responsibilities or the requirement to have a process for initiating and responding to referrals. Districts should provide an alternative method for receiving and documenting referrals when the usual electronic process is unavailable or not functioning as expected. See A1 and A2 for additional guidance on temporary alternative methods and documenting actions completed through a temporary process. Districts should ensure that referrals are appropriately documented and that applicable timelines are calculated from the appropriate date, regardless of the method used to receive the referral.

G6. What should districts do if an electronic system issue affects a Part C to Part B transition?

Districts remain responsible for completing the Part C to Part B transition process within applicable timelines, including completing the evaluation and developing an IEP by the child's

third birthday when the child is determined eligible for Part B services. If an electronic system issue affects the district's ability to complete or document the process, the district should use an appropriate alternative method and maintain documentation of the actions taken. Districts should communicate with OSPI as soon as possible if a system issue may affect the applicable timeline.

H. Progress Reporting

H1. What should districts do if the electronic system does not provide access to historical progress-reporting information?

Districts must use other available records or reliable alternative methods to access and maintain prior progress-reporting information as part of the student's record. This may include paper or electronic copies of prior progress reports, information maintained in other district systems, or other records documenting progress that are available to the district. Districts should not recreate or alter historical information solely to address a system limitation.

If the information is needed for current IEP decisions, the team should review the available information, document the information considered and any limitations caused by unavailable system data, and use the information available to inform the team's decisions.

H2. May districts use an alternative method to document and provide required progress reports when the electronic system does not support the process?

Yes. Districts may use a short-term alternative method to document and provide required progress reporting when the electronic system cannot support the process. See A1 and A2 for additional guidance on temporary alternative methods and maintaining documentation created through a temporary process. The alternative method must ensure that the required information is complete, provided to families in accordance with the IEP and applicable requirements, and maintained as part of the student's record.

To fulfill ongoing progress reporting and special education requirements districts should proactively identify gaps in needed student progress data and may need to locate or collect additional data when needed. Districts should retain sufficient documentation to demonstrate that progress reporting occurred as required.

I. Historical Records and Access

I1. What records must districts maintain when transitioning from one electronic IEP system or version to another?

Districts must continue to maintain required educational records, including special education records (IEPs, evaluations, progress reports, prior notices, amendments, and other documentation needed to demonstrate compliance and support the provision of student services). Districts should review their district policies and procedures related to record retention, what records are retained, and where and how records are retained. Moving to a new system or version does not change records-retention responsibilities. Districts must ensure the required records remain available.

I2. What should districts do if historical IEP, evaluation, progress-reporting, or other special education records did not migrate into the new system?

The district must maintain access to historical records through another reliable method and use those records when needed for current decision-making. If records are missing from the new system, districts should document the issue and the short-term alternative process used to access or maintain the records. See A1 and A2 for additional guidance on temporary alternative methods and maintaining and later reconciling records through a temporary process. When the system issue is resolved, the district must enter, upload, or otherwise reconcile the information in the electronic system consistent with district procedures.

If historical records are needed for a current IEP or evaluation, but are not accessible through the system, the district must use other available district records, paper files, archived documents, parent-provided records, or records obtained from another district as appropriate. The team should document what records were reviewed and how missing information was addressed.

I3. Does moving to a new electronic IEP system change district records-retention requirements?

No. A system migration does not change a district's obligation to maintain required education and special education records. Districts must ensure records remain accessible for required purposes even if they are not fully available in the new platform yet.

J. Monitoring and Dispute Resolution

J1. What should a district do if issues with its online IEP system prevent or interfere with its ability to respond to an OSPI monitoring request or correct a finding of noncompliance (Form Package 442)?

The district should communicate with OSPI as soon as possible. A system issue does not by itself eliminate the district's obligation to address findings of noncompliance or respond to monitoring requests, but OSPI can work with the district to identify appropriate workarounds and, when necessary, discuss extensions to established timelines. See A1 for examples of temporary alternative methods and A2 for guidance on maintaining documentation created through a temporary process.

Districts should maintain documentation of actions taken to correct noncompliance and be prepared to provide requested records through an alternate method if needed.

J2. What can districts do when system challenges create concerns or disagreements with families?

Districts should be proactive and transparent with families about challenges related to the electronic IEP system and any impact on the IEP processes or documentation. Districts should communicate how they are ensuring continuity of special education services and, when IEP documentation is affected, explain that documentation may temporarily look different as districts use the alternative methods described in Section A.

If concerns or disagreements arise, districts should consider available district-level problem-solving options and may also consider facilitated IEP meetings or mediation to support communication and resolution.

J3. What should districts do if electronic IEP system limitations impact a district's ability to respond to a special education community complaint (SECC)?

Districts should respond to the complaint as required by [WAC 392-172A-05030](#) and if there are anticipated challenges in providing the documentation OSPI has requested, the district should immediately contact the assigned investigator and/or assistant director of special education dispute resolution to discuss. OSPI is required to investigate and identify whether there is any noncompliance via the SECC process. However, OSPI's dispute resolution team can work with the district on how information is provided as part of the investigation.

Districts should provide any available documentation, including the IEP or temporary alternative documentation that has been created using [OSPI's model forms](#) or, when necessary, a paper

process, prior written notices, or other documentation. See A1 and A2 for additional guidance on temporary alternative methods and maintaining documentation created through a temporary process. Districts may also want to request interviews or that the OSPI investigator visit the district as an alternative way to provide information.