

April 17, 2020

Ms. Ronnetta Stanley Loud Voices Together Educational Advocacy Group, Inc. P.O. Box 1178 Temple Hills, MD 20748

Dear Ms. Stanley:

Below are the responses to the questions from Prince George's County Special Education Coalition regarding the convening of IEP and Section 504 meetings in Prince George's County Public Schools.

1. The guidance from PGCPS states the following which directly contradicts MSDE's April 2, 2020, TAB:

Reevaluation and Annual Review IEP meetings shall be postponed until school reopens. Evaluations and Reevaluations require assessment of students and observations in the learning environment. IEP meetings require consideration of multiple sources of information, including classwork, classroom-based assessments, accommodations checklists, written observations and other information that is maintained at the school. Given the need for comprehensive information, these IEP meetings will be rescheduled upon the reopening of school due to the inability of PGCPS staff members to physically access students' records, conduct observations and or formally assess students.

- a. Please explain why the students' data cannot be digitized and shared in a digital format?
- b. What physical records do you need access to that are not in Maryland Online?

**PGCPS Response:** Guidance for IEP meetings shall remain in effect until April 24, 2020. PGCPS will provide additional guidance regarding IEP meetings if schools remain closed after April 24, 2020. Reevaluations and annual review IEP meetings require the review of multiple confirming data including but not limited to, observations of the student in the learning environment, information, classwork, classroom-based assessments, accommodations checklists, written observations and other information that is maintained at the school. Many data sources are currently maintained in hard copy formats at the school site and are not available in an electronic format.

2. What is the plan once school reconvenes? (a) For making up postponed IEP meetings. (b) For making up for missed services/specialized education.

**PGCPS Response:** Guidance for IEP meetings shall remain in effect until April 24, 2020. PGCPS will provide additional guidance regarding the status of IEP meetings being held by April 24, 2020, since schools are now closed until May 15, 2020.

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3. Why is PGCPS implementing different guidelines than other counties around the state?

<u>PGCPS Response</u>: Guidance for IEP meetings shall remain in effect until April 24, 2020. PGCPS will provide additional guidance regarding IEP meetings if schools remain closed after April 24, 2020. PGCPS's implementation of distance learning through the Continuity of Learning Plans is consistent with state guidance.

4. We have been told by parents that PGCPS is denying parents the opportunity to have advocates and attorneys participate in the ICLP meetings. Parents are also being denied the opportunity to have a copy of the ICLP in advance of the meeting and input in the development of the ICLP. Is this PGCPS's policy?

**PGCPS Response**: The development of the ICLP is not part of the IEP meeting process. Parents/guardians have the opportunity to contribute to its development. If there are specific incidents that you would like to share where this did not occur, please provide the name of the student and school and send that information via email to Trinell Bowman, Director of Special Education for follow up. The Compliance Office will contact parents who have expressed disagreement with the ICLP.

5. What happens to students who cannot access online learning because of their disability/ies? What accommodations will be provided for them to have access?

**PGCPS Response:** Effective Monday, April 20, 2020, hard copy enrichment packets for students who do not have access to online technology or cannot access online learning will be provided at all meal pick-up sites throughout Prince George's County. The meal pick up sites are available at this link: <u>https://www.pgcps.org/coronavirus/meal-sites/</u>. In addition, hard copy or electronic braille instructional materials and equipment are being provided to students with visual impairments who cannot access online technology. Special education teachers and related service providers will provide telephone consultative services to families who do not have access to technology to further assist families with supporting their children with distance learning activities.

6. How will ESY determinations be made? It seems that if the student received ESY last year, the student should be eligible again this year, unless there is an agreement or meeting with a decision to the contrary. For students who didn't receive ESY last year but where there is agreement the student should receive it this year, the team could agree to ESY by amendment without a meeting.

**PGCPS Response:** Extended School Year (ESY) IEP determination meetings that were not held prior to the COVID-19 school closure will be held from April 27, 2020 through May 22, 2020. Case managers will begin contacting parents to schedule ESY determination IEP meetings virtually on during the week of April 27, 2020. ESY determinations are not made based on the previous year's decision. The school has to determine that the student meets the criteria every year.

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7. For students who are found eligible for special education and related services and an IEP is developed during the school closure, will an ICLP also be created for the student? Will an ICLP also be created for the student? Will the IEP that is developed focus on the student's needs when attending school in the school building?

**PGCPS Response**: Yes. An ICLP will be developed for any student once their initial IEP is developed and approved by the parent/guardian. The IEP will be developed based on needs and supports when attending school. The ICLP is based on the student's Individualized Education Program (IEP) that can be implemented during the COVID-19 school closure. It does not seek to replicate the classroom experience in its entirety. Rather, teachers will provide specially designed instruction that may be completed independently, guide students through a variety of learning experiences, and provide opportunities for students to ask questions and engage with the teacher remotely during scheduled online sessions.

8. Will ICLPs be developed for Section 504 students?

**PGCPS Response**: No. ICLPs will not be developed for students with a 504 plan. Professional School Counselors (PSCs)/504 Case Managers will continue to provide services to individual students on their caseload in accordance with each student's 504 Plan. Related services providers will collaborate with the student's teacher(s) and parent around specific accommodations delineated on the student's 504 plan.

9. How will students who require services under IDEA Part C participate in telehealth related services and distance learning?

**PGCPS Response**: Primary service providers, in collaboration with other team members, will work together to address the needs of family and child as indicated in the Individualized Family Service Plan (IFSP). Service providers working with families will determine the best platform to implement the IFSPs. For children transitioning to preschool at age 3, PGCPS will proceed with the development of the initial IEP. Children will be assigned to a teacher and an ICLP will be developed.

10. What reading and math interventions can be provided via the ICLP during the school closures?

<u>PGCPS Response</u>: As indicated on the PGCPS website at this link: <u>https://ektron.pgcps.org/Coronavirus/distance-learning/cards/Important-Update-for-Parents-or-</u> <u>Guardians-of-Students-with-IEPs-or-Section-504-Plans/</u>

Students with disabilities who were receiving an online evidence-based intervention as documented on their IEP or through the Intervention Selection Procedure (ISP) prior to the COVID-19 school closure. Interventions that do not have an online component are unable to be implemented during the COVID-19 school closure. Students will continue to have access to the following online interventions:

Elementary Interventions	Secondary Interventions
• I-Ready Mathematics Grades K-5/6	Achieve 3000 Grades 6-12
Lexia Core 5 Grades K-5	<ul> <li>I-Ready Mathematics Grades 6-10</li> </ul>
• SPIRE Grades K-5/6	• Read 180/System 44 Grades 6-12
	• SPIRE Grades 6-8

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11. For MDR determinations that a student's behavior is not a manifestation of his disability, what virtual/distance learning educational services will be provided during the length of the removal? How will BIP be monitored and data collected?

**<u>PGCPS Response</u>**: Students who are suspended during the COVID-19 school closure will have an ICLP developed. Behavior intervention plans will not be implemented at this time due to factors that adversely impact the ability of school-based staff members to implement strategies, observe, document and modify or adapt the instructional environment to generate changes in behavioral outcomes.

12. How will grading be handled from March 16 – present? Will students receive pass/fail? What will be the transcript impact for high school students or graduating seniors?

**PGCPS Response:** As indicated on the PGCPS website at this link: https://www.pgcps.org/coronavirus/distance-learning/#grading

Monday, March 30, 2020, will remain the end of the third quarter. From Monday, March 30 through Friday, April 3, 2020, students were allowed to electronically submit any work assigned or expected to be turned in during the two-week closure. Students who are unable to submit assignments electronically will not be penalized. Any work identified by the teacher as enrichment during the two-week closure will not be graded. Fourth quarter started on Tuesday, April 14, 2020. Students will earn a Pass (P) or Incomplete (I) grade at the conclusion of the quarter. Final grades will represent a letter grade from the first three quarters and an explanation included on all transcripts that fourth-quarter grades were earned remotely.

13. What is the process for graduating seniors who had previously scheduled IEP meetings before school closed?

**<u>PGCPS Response</u>**: Exit IEP meetings for graduating seniors will be held between April 27 - May 15, 2020.

If you have any questions, please email me at <u>Gwendolyn.Mason@pgcps.org.</u> Thank you.

Sincerely,

I. Mara

Gwendolyn J. Mason, Ed.D. Chief, Division of Special Education and Student Services

c: Ms. Trinell Bowman Ms. Gail Viens Ms. Marcella Franczkowski