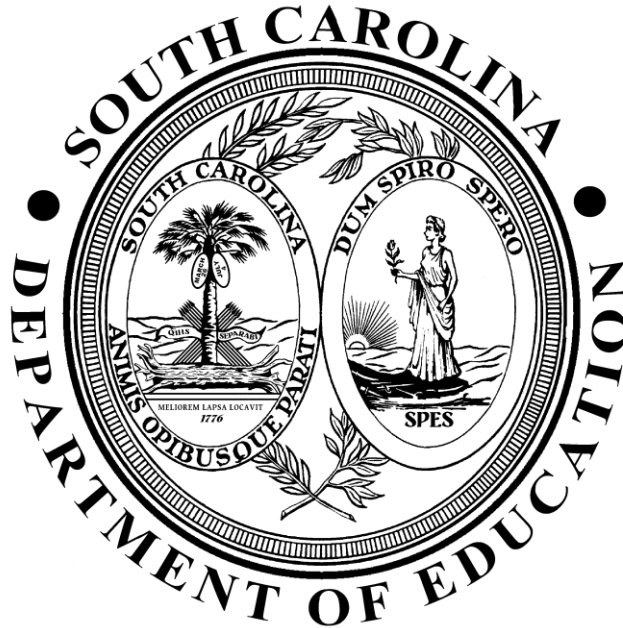


STATE OF SOUTH CAROLINA

DEPARTMENT OF EDUCATION

MOLLY M. SPEARMAN
STATE SUPERINTENDENT OF EDUCATION



Special Education COVID-19 Guidance

South Carolina Department of Education, Office of Special Education Services
In collaboration with: Advisory Council for Educating Students with Disabilities, Clemson University,
Family Connection of South Carolina, Protection & Advocacy for People with Disabilities, Inc.,
Transition Alliance of South Carolina, South Carolina Partnerships for Inclusion, University of South
Carolina, South Carolina Council of Administrators of Special Education, Edgefield, Florence Two,
Florence Three, Florence Four, Horry, Lexington Two, Newberry, Richland One, Spartanburg Two, and
Williamsburg County School LEAs

Pursuant to the Individuals with Disabilities Education Act, Section 504 of the Rehabilitation Act, and
Title II of the Americans with Disabilities Act

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Introduction

The purpose of this document is to provide guidance and information for local educational agency (LEA) leaders on the education of students with disabilities during and after the novel coronavirus disease (COVID-19) global pandemic. On March 15, 2020, Governor Henry McMaster issued an executive order closing physical school buildings for public schools.

Since South Carolina's school facilities first closed in March 2020 in response to the COVID-19 pandemic, the South Carolina Department of Education (SCDE) and the Office of Special Education Services (OSSES) announced that the health and safety of students and staff are our first priority. Additionally, the SCDE has worked together with LEAs on providing all students access to continuous learning experiences while remaining safely at home. All LEAs offered some type of continuous learning activities during the school closures. Such opportunities for continued learning were determined individually by each LEA and, therefore, looked different from LEA to LEA.

In anticipation of school facility closures or modified operations in the coming school year, the OSSES convened the Special Education COVID-19 stakeholder group. The focus of the stakeholder group was to provide guidance that is intended to ensure that school systems are prepared to serve students with disabilities, along with all students, for the 2020–21 academic year. The COVID-19 stakeholder group includes representatives from the South Carolina Advisory Council for Educating Students with Disabilities, Clemson University, Family Connection of South Carolina, Protection and Advocacy for People with Disabilities, Transition Alliance of South Carolina, South Carolina Partnerships for Inclusion, South Carolina Council for Exceptional Children's Council for Administrators of Special Education, and the University of South Carolina. South Carolina school LEAs represented on the COVID-19 stakeholder group include Edgefield, Florence Two, Florence Three, Florence Four, Horry, Lexington Two, Newberry, Richland One, and Williamsburg County school districts.

Compliance with the Individuals with Disabilities Education Act (IDEA), Section 504 of the Rehabilitation Act (Section 504), and Title II of the Americans with Disabilities Act (ADA) mandates the continued provision of educational programs for students with disabilities during and after the pandemic. Under the IDEA, LEAs must continue providing students with disabilities a free appropriate public education (FAPE) during the current pandemic and any future recurrence. No procedural safeguards or programmatic requirements of IDEA have been waived.

Because of the unexpected school closure for the remainder of the 2019–2020 school year, the SCDE required LEAs to develop and communicate plans with parents and adult students on how the general education curriculum and instruction and special education and related services would be delivered to students, to the extent possible, during the COVID-19 school closure. Additionally, LEAs should have provided contact information for parents to report any concerns or questions regarding the amount, type, frequency, and method of delivery of instruction and services. The OSSES suggested the use of a prior written notice as a method to communicate this information for students with disabilities.

To ensure students with disabilities receive a FAPE, the Special Education COVID-19 Stakeholder group is providing guidance regarding services and funding that is intended to safeguard the quality and consistency of future instruction and access to continuous learning. This document includes this guidance and other information and procedures that LEAs and Individualized Education Program (IEP) teams should utilize in the decision-making processes related to the amount, type, frequency, location, and methods of delivery of general education, special education, related, and other applicable services for students with disabilities during the 2020–21 school year.

Legal Requirements

Definitions

Compensatory Services — Compensatory services are educational services that are awarded or can be agreed upon by an IEP team to be provided to a student with a disability to address an LEA's failure to provide the student with a FAPE under the IDEA. Compensatory services a student may receive are considered only on a case-by-case basis and when a FAPE has been denied. Compensatory services should be addressed by a student's IEP team. The goal of compensatory services is to put the student back in the position the student would have been in had a FAPE been provided.

Extended School Year (ESY) — For a student to receive ESY services, the student must have exhibited substantial regression and recoupment issues during breaks in the previous IEP year (summer break, fall break, winter break, and other extended breaks in instruction) and/or there is evidence of emerging skills that are often referred to as "breakthrough" skills that would be lost if there was an extended break in instruction and support. The focus of services provided to the student as part of an ESY program are generally not upon learning new skills or "catching up" to grade level, but rather to providing practice to maintain previously acquired, learned or emerging skills. The break from school caused by COVID-19 should not be a part of the ESY determination. The LEAs should continue plans to provide ESY services when needed, but during the pandemic, the mode of delivery may change.

Free Appropriate Public Education (FAPE) — All students residing in South Carolina between the ages of three and twenty-one who are eligible for services under the IDEA are to have a FAPE made available to them. A FAPE is defined as special education and related services that (a) are provided at public expense, (b) meet the standards of the State Educational Agency, (c) include an appropriate preschool, elementary school, or secondary school education; and (d) are provided in conformity with a student's individualized education program (34 CFR § 300.17). In the time of COVID-19, FAPE must be delivered, although it may look different than services provided before the pandemic because the nature of all instruction changed.

Individualized Education Program (IEP) — An IEP is a program of special education services developed for a student with disabilities who is eligible under the IDEA following the requirements of the IDEA. It is developed by a student's IEP team, which consists of a student's parents, a representative of the LEA, the student's special education and general education

teachers, and an individual who can interpret the instructional implications of the evaluation results. The IEP, when implemented, represents a student's FAPE.

Academic Recovery Services (ARS) — These services will be offered to all students who are determined by the LEA to be at risk as a result of missed instruction due to building closures in March. The ARS will be designed to address unfinished learning from the previous year and to help students recover skills and learning related to priority standards to ensure all students will be able to continue in the learning progression at the next level. The ARS may begin during the legislatively mandated Learn, Evaluate, Analyze, Prepare (LEAP) days that LEAs may be offering prior to the office opening of the new school year. For many students, including students with disabilities, these ARS will continue into the first semester.

Supplemental School Closure Services — This is the term the OSES is using to describe the special education services students with disabilities may need related to the COVID-19 school closure, and the extended change to the instructional environment. As school buildings reopen, LEAs will take steps to determine the impact that the extended school closures had on student progress for all students. For students with disabilities, IEP teams will need to review the students' data to determine where the students were when school buildings closed, where the students are when schools reopen, and what services, if any, students may need to recover and begin working toward IEP goals. Critical components include:

1. What instruction and continued learning opportunities looked like for all students;
2. How general education students accessed instruction during this time; and
3. How the closures affected students without disabilities.

Contingency Plan Services — Contingency services were provided during the spring in response to the building closures when the LEA was unable to provide the "typical" standards-based, high quality instruction and instead provided emergency learning opportunities. The contingency services were designed to provide reasonable and practicable access to those continued learning opportunities. Moving forward, contingency plan services will be designed to provide access and progress during short-term emergency closure of the building when the LEA is unable to provide "typical" standards-based, high quality instruction through an alternative instructional delivery model.

The chart below summarizes the difference among services described.

Recovery Services	Supplemental School Closure Services	Compensatory Services	Contingency Plan Services
<ul style="list-style-type: none"> ● Offered to all students as a result of missed instruction due to COVID closures ● Address unfinished learning for all students ● Designed to recover priority standards to ensure all students will be able to continue in the learning progression at the next level 	<ul style="list-style-type: none"> ● Based on degree to which services during emergency deployment of continued learning opportunities were accessed ● Will include special education and related services needed to ensure student with a disability can continue to make progress toward annual goals ● Will be part of the school day ● Should not change least restrictive environment (LRE) 	<ul style="list-style-type: none"> ● Needed when there was a denial of a FAPE due to the school/district’s failure to provide services in the IEP ● Provided in addition to school day and services currently in the IEP ● Designed to close the gap between where the student would have been if services had been provided and where the student is now 	<ul style="list-style-type: none"> ● Provided during an emergency school closure when the school/district is unable to provide “typical” instruction and must deploy emergency continued learning opportunities ● Designed to provide reasonable and practicable access to the continued learning opportunities ● Designed for short-term, emergency closure when the school/district is unable to provide standards-based, high quality instruction through an alternative model

Legal Precedence

The IDEA, Section 504, and Title II of the ADA do not specifically address a situation in which elementary and secondary schools are closed for an extended period because of exceptional circumstances, such as the COVID-19 pandemic. In South Carolina, all LEAs continued to provide educational opportunities to all students during the pandemic, including special education services.

Since all LEAs continued to provide educational opportunities to general education students, each LEA had to ensure that students with disabilities had equitable access to the same opportunities, including the provision of a FAPE in accordance with the IDEA Regulations 34 CFR §§ 300.17, 300.101 and services and accommodations under Section 504 34 CFR §§ 104.4,

104.33 and Title II of the ADA 28 CFR § 35.130. LEAs ensured that, to the greatest extent possible and in keeping with the health and safety restrictions necessitated by the pandemic, each student with a disability was provided the special education and related services identified in the student's IEP developed under IDEA Regulations 34 CFR §§ 300.101 and 300.201, and individualized accommodation plan or 504 plan under Section 504 34 CFR § 104.33.

A main purpose of the IDEA is, “to ensure that all children with disabilities have available to them a FAPE that emphasizes special education and related services designed to meet their unique needs and prepare them for further education, employment, and independent living” per requirements of regulations 42 USC § 1400(d)(1)(A); 34 CFR § 300.1. The major purpose of the IDEA is to provide specially designed instruction to (a) address the unique needs of a student with disabilities that result from that student's disability and (b) to ensure access of the student to the general curriculum so the student can meet the educational standards that apply to all students per requirements of regulation 34 CFR § 300.39(3). The change in education from standards-based, high quality instruction for all students to the emergency deployment of continued learning opportunities during the pandemic meant that special education services were impacted as well. The access and support needed to receive a FAPE looked different due to the difference in instruction in general.

Disclaimer: This document is not intended to cover all situations and circumstances. The IEP teams must remember all IEP team decisions should be individualized to meet the student's unique needs that arise from his/her disability.

Flexibility

According to the United States Education Department (USED), there was a “fundamental misunderstanding” in the educational community regarding students with disabilities during the COVID-19 pandemic. To address this misunderstanding, USED officials wrote: “As school LEAs nationwide take necessary steps to protect the health and safety of their students, many are moving to virtual or online education (distance instruction). Some educators, however, have been reluctant to provide any distance instruction because they believe that federal disability law presents insurmountable barriers to remote education. This is simply not true.”

The Guidance further noted, “To be clear: ensuring compliance with the IDEA, Section 504 of the Rehabilitation Act (Section 504), and Title II of the Americans with Disabilities Act should not prevent any school from offering educational programs through distance instruction.”

Clearly, the USED recognized that the use of distance and online instruction to provide special education and related services may be necessary to protect the health and safety of administrators, teachers, and students. Additionally, disability-related modifications and services may be provided, such as (a) distance instruction, (b) teletherapy and tele-intervention, (c) extensions of time for assignments, (d) videos with accurate captioning or embedded sign language interpreting, (e) accessible reading materials, and (f) speech or language services may be provided through video conferencing.

Nonetheless, officials at the USED asserted that school LEAs “must provide FAPE consistent with the need to protect the health and safety of students with disabilities and those individuals providing education, specialized instruction, and related services to these students.” The guidance indicates, “These exceptional circumstances may affect how all educational and related services and supports are provided, and the Department will offer flexibility where possible.” The guidance provides that, “where, due to the global pandemic and resulting closures of schools, there has been an inevitable delay in providing services – or even making decisions about how to provide services - IEP teams (as noted in the March 12, 2020 guidance) must make an individualized determination whether and to what extent compensatory services may be needed when schools resume normal operations.”

<https://www2.ed.gov/about/offices/list/ocr/frontpage/faq/rr/policyguidance/Supple%20Fact%20Sheet%203.21.20%20FINAL.pdf>.

The guidance suggests that USED understands it may not be feasible for schools to provide all of the same services as they did before the COVID-19 pandemic and urged that educators and parents collaborate in determining how services will be delivered. The USED confirmed that existing special education law provides room for flexibility in how schools can meet the needs of students, even during the COVID-19 pandemic.

Convening IEP team meetings or IEP reviews in the time of COVID-19 continues to be a challenge. The IDEA does allow a student’s IEP meeting to be held through alternative means, such as virtual meetings if parents and school personnel agree to this under IDEA Regulation, 34 C.F.R. § 300.328. The USED has identified three of the national technical assistance centers as being the repositories for information related to COVID-19 resources including an excellent resource for conducting virtual IEP meetings. These centers include the National Center for Systemic Improvement (<https://ncsi.wested.org/>); the Early Childhood Technical Assistance Center (<https://ectacenter.org/>); and the Center for Parent Information and Resources (<https://www.parentcenterhub.org/>). The tip sheets developed by these centers are available on their websites. It is important that confidentiality be maintained in such meetings as required by the IDEA and the Family Educational Rights and Privacy Act (FERPA).

Determining Services upon Return

All students, including those with identified disabilities, have been affected by the COVID-19 pandemic. There are complexities when determining how distance and emergency learning impacted all students. In addition, we must consider to what extent specialized services, supports, and accommodations were delivered to and made accessible to students with disabilities during the pandemic.

Moving forward, it is essential that the impact of the school closure and the needs of students with disabilities are clearly identified so as to know how best to mitigate the impact.

The LEAs will be opening schools for the 2020–21 school year in a manner unlike any other year. The LEAs have developed reopening plans designed to meet the needs and be responsive to current pandemic conditions within their communities. These plans have been submitted to and approved by the SCDE. All plans included alternative instructional delivery models to the traditional “face-to-face” model with which most students and parents were familiar. Alternative models seen across most reopening plans included hybrid and virtual instructional delivery models. The LEAs had to assure that standards-based, high quality instruction would be provided across all instructional delivery models. The chart below provides a description of each model:

INSTRUCTIONAL DELIVERY MODELS			
Face-to-Face	Hybrid	Virtual-Synchronous	Virtual-Asynchronous
Provides traditional, in-person instruction and learning	Provides face-to-face instruction several days a week and virtual instruction the other days	Provides instruction through a live, virtual format using an on-line learning platform	Provides instruction via pre-recorded lessons that may be accessed at any time

Many LEA reopening plans offered parents the option of choosing among the different instruction delivery models or even the option to change between models once schools reopened. This flexibility in instructional delivery model and parent choice is unprecedented across most the state’s public school system.

All reopening plans were required to describe how the needs of students with disabilities would be met. All plans were required to include language that clearly communicated that all IEPs must reflect the instructional delivery model chosen by the parent so that appropriate special education and related services, supports, accommodations, and modifications are designed to provide meaningful educational benefit (FAPE) in the least restrictive environment.

In order to prepare for the 2020–21 school year, the LEAs, schools, and teachers should communicate early and often with students and parents. The two groups need different types of reassurance.

- For students: All students, especially those with disabilities, will need clear directions about expectations for face-to-face, hybrid, and virtual learning.
- For parents: Communication and partnership is essential. Reassure parents that services will be provided to the extent practicable and reasonable given the circumstances. This could be communicated through means such as written correspondence or other methods used in the LEA. Set parents at ease by stating your commitment to ensure students with disabilities will receive FAPE regardless of the instructional delivery model.
- For both: Setting reasonable expectations for learning and services can help students, parents, and educators feel confident and informed. Be open and honest about what is working and what needs to be adjusted. Acknowledging solidarity and a shared commitment to a FAPE, even during these times of uncertainty, will go a long way toward building the kind of relationship that continues to support IEP teams now and in the future.

Special education LEA leaders will need to establish communication throughout the LEA with principals and essential members of the IEP team. As LEAs prepare to return to school, there are key issues that the families of students with disabilities have concerns about including compensatory services, ESY services, and supplemental school closure services. This communication will help to prevent disruptions in student learning, and difficulties during IEP team meetings.

Throughout the 2020–2021 school year, the IEP teams will need to meet to determine what types of services students may need. The IEP teams will need to gather data prior to the meeting in order to answer the following questions during the IEP meeting:

- What instruction was delivered to all students in this grade level during the closure?
- How has the school/LEA measured the learning of all students during the closure?
- What services was the student provided during the closure?
- What was the student’s progress towards IEP goals prior to school closure?
- Once the student has returned to school, what is the student’s progress towards IEP goals?
- What did the trend in progress monitoring show before and after the school closure? How do the data compare?
- If the student did not make expected progress, what services are needed to make up for that lack of progress?
- Where was the student in relation to peers on the last winter benchmark prior to COVID-19?
- Where does the student fall on the first benchmark in the fall in relation to their peers?
- What was the growth of average peers versus the growth of the student with a disability?

IEP teams should meet to determine the performance of the student prior to school closure, review the student's current performance, and determine the appropriate services that are necessary moving forward. Based on the data and information discussed, the IEP team will need

to determine whether there are any needs for supplemental school closure services and/or compensatory services. The IEP team must take into account the effect of the COVID-19 school closures for ALL students to determine the relative impact for a student with a disability when considering supplemental school closure services. Special education services are not intended to mitigate the impact of COVID-19, therefore the impact for all students must be considered first.

Compensatory services should be considered if no special education services were provided to the student or if the IEP team determined the student did not receive a FAPE. Compensatory services should be individualized to the unique needs of the student. The team must consider how the student was impacted by the denial of a FAPE and how the student is expected to respond to compensatory services. Some students will demonstrate an impact consistent with ALL students from the extended school closure, and therefore not require compensatory services.

Parents and staff should remember that instruction changed for all students during the closure. Many students with disabilities adjusted to the difference in continued learning opportunities and were able to access and progress in these opportunities

Examples

Extended School Year (ESY)

Are ESY services the same as supplemental school closure services?

No, ESY services are not the same as supplemental school closure services. The consideration for ESY services should be made based on data obtained prior to the extended school closure. These data should be considered in light of the questions below:

1. Has the student shown substantial regression and recoupment issues during the previous IEP year(s) and breaks (e.g., Winter break)?
 - If yes, the student has had extended school year in the past, and/or there is data to show that the student regresses during the summer– discuss ESY services.
 - If no, the student has NOT had extended school year services in the past, and/or there are no data to show that the student regressed during the summer, the student is likely not eligible for ESY.
2. Is there evidence of emerging skills that are often referred to as "breakthrough" skills?
 - If yes, the student's IEP present levels and goals show that the student has been working on breakthrough skills, the team should discuss ESY services.
 - If no, the student's IEP present levels and goals do not show that the student has been working on breakthrough skill, the student is likely not eligible for ESY services.
3. Is there evidence of the nature and severity of the student's disability impacting the maintenance of attained skills?

- If yes, the student’s IEP present levels and goals show that the nature and severity of the student’s disability impact the maintenance of attained skills, then discuss ESY services.
 - If no, the student’s IEP present levels and goals do not show that the nature and severity of the student’s disability impacts the maintenance of attained skill, the student is likely not eligible for ESY services.
4. Is there evidence of special circumstances such as a large number of absences during the school year that are relevant to the consideration of ESY services?
- If yes, the student’s data shows evidence of special circumstances such as a large number of absences during the school year that are relevant to the consideration of ESY, then the team should discuss ESY services.
 - If no, the student’s data does not show evidence of special circumstances such as a large number of absences during the school year that are relevant to the consideration of ESY, the student is likely not eligible for ESY services.

Supplemental School Closure Services

Supplemental School Closure Services is the term South Carolina will be using to discuss the services students may need related to the COVID-19 school closure, and the related extended learning change to the instructional environment. Critical components include:

- How instruction was made available for all students, with and without disabilities, during this time?
 - Given how general education was accessed during this time did the student receive a version of special education services during the extended school closure?
 - If applicable, did the services allow for the same access as students without disabilities?
- How the closures affected students without disabilities.
 - If data collected shows similar impact to that of general education peers, supplemental services may not need to be provided.
 - Caveat: Not all goals and services can be compared to peers, because peers aren’t working on those types of goals or skills e.g.: Speech goals addressing pragmatic skills, articulation, voice, dysphasia, etc. The team will have to compare to the student’s rate of improvement using past data.

For example, the student’s IEP includes specialized instruction in the area of reading for sixty minutes per day to be provided in the special education classroom for academic support. During the extended school closure, the student received virtual assignments and direct virtual lessons two times weekly from the special education teacher in addition to the general education assignments and offerings. Using progress data collected upon return to school, consider the impact of the extended school closure for ALL students and determine the extent to which supplemental services may be needed for the student with a disability.

Another example might be a student with an IEP that includes services in the area of speech-language for sixty minutes per week in a small group setting. During the extended school

closure, the student received a weekly learning packet and weekly phone/virtual contact from the speech provider. Using progress data collected upon return to school, consider the impact of the extended school closure for ALL students and determine the extent to which supplemental services may be needed for the student with a disability.

The final example is a student whose special education provider contacted the student and the parent to discuss the contingency services to be provided to the student during the extended school closure. The parent declined the services offered. The special education provider continued to contact the student and family to provide the services to the student and these contacts were documented. Using progress data collected upon return to school, consider the impact of the extended school closure for ALL students and determine the extent to which supplemental services may be needed for the student with a disability.

In all examples, the IEP team would need to consider the need for recovery services for all students, then for the student with a disability. If the team determines supplemental school closure services are needed after the student has received recovery services to enable the student to begin to work on his/her annual goals and continue in the learning progression, then these services would need to be provided.

Note that for most students, the provision of supplemental school closure services should not change the student's LRE.

Compensatory services

Compensatory services are educational services that are awarded to students with disabilities to make up for services that they lost because of an LEA's failure to provide a FAPE under the IDEA.

Was the student provided access to and opportunity to progress in the same instruction that non-disabled students received during the school closure?

- Yes, the student was able to access instruction delivered during the closure and was affected in the same manner as students without disabilities progress, then the team should discuss supplemental services if appropriate.
- No, the format of the instruction was not accessible to the student and the student did not make progress, then the team should discuss compensatory services in needed areas. It is possible for a student to receive supplementary services and compensatory services.
 - For example, a student received services in reading but not in speech, the IEP team would need to determine if the student needs compensatory speech services due to the LEA's failure to provide speech services. Based on student progress in reading, the student may qualify for supplemental school closure services but not compensatory services.

Was the service necessary during the school closure? For example, the IEP includes transportation daily to and from school, but during the closure this services was not necessary; therefore, compensatory services are not necessary.

The IEP includes special education services, related services, or goals specific to the school setting. For example, the IEP includes one hour per day of behavioral support related to transition from class to class or activity to activity within the classroom. This specific service was not necessary; therefore, no compensatory services are necessary. However, the student may have substantial needs when returning to school. The IEP would need to discuss the student's present levels and current support and discuss if supplemental school closure services are needed.

Budget Guidance

The Coronavirus Aid, Relief, and Economic Security Act (CARES Act), also known as the “third COVID-19 supplemental relief bill,” was signed into law on March 27, 2020. The CARES Act provides economic relief to public school LEAs in a variety of ways, allocating funding to COVID-19 response measures, after-school and summer learning programs, student nutrition and mental health supports.

LEAs will need to evaluate the impact of funding available under the CARES Act as they continue to meet their students' many needs. There are three immediate steps that LEA leaders can take to prepare for these funds:

1. Identify the most critical needs—now and in the future. The LEA needs to use key data and evidence, as well as community stakeholder input, to identify highest priorities. To determine the impact the pandemic will have on the most marginalized students and families, the LEA should consider equity and the students with the most needs, and work to ensure equitable access to education services.
2. Consider how these funds can be used to close equity gaps in remote learning, support school communities, promote summer learning to mitigate further learning loss and efforts to ensure equitable access to educational resources for students with disabilities. The CARES Act funds can be combined with other state and local funds to promote an integrated approach. The LEAs should consider how to best engage families and communities to help identify the greatest needs and best strategies, and how to best engage with state leaders as well.
3. Analyze and track additional needs as early as possible. At this time, how schools will look at the state of the 2020–21 school year is not predictable. Uncertainties include the duration of the pandemic as well as its impact on public health and safety, the economy, and state and local revenues. The long term effects of the pandemic and educational opportunities and learning is unknown. Implications could extend into the next school year or beyond. The CARES Act funds will be helpful but at this time do not extend past the immediate needs. As early as possible, LEAs should analyze the impact of the crisis on students' long-term academic, social, and emotional development.

Summer Instructional Opportunities

The CARES Act funding is for the short-term COVID-19 response. This is not long-term funding and these funds must be spent according to the guidelines from the USED. These funds are intended to help immediately with costs related to the crisis. The law gives many options for what these costs might be, including (but not limited to) summer school and after-school programs and mental health programs. It also has some very expansive options at the school and LEA levels: "providing principals and others [sic] school leaders with the resources necessary to address the needs of their individual schools" and "activities necessary to maintain the operation of and continuity of services in local educational agencies."

Even when schools reopen, the pandemic related consequences will stay with everyone for some time. The OSES and the Special Education COVID-19 Stakeholder group suggest using funds on ARS for ALL students, including students with disabilities.

Supplemental School Closure Services

Unlike ARS, supplemental school closure services are specific to students with disabilities. Additional supplemental school closure services are decided on an individual student basis by the student's IEP team, making the costs of supplemental school closure services difficult to determine.