



## Placement Decisions During COVID-19 Pandemic

Placement decisions for eligible students can be, in the best of times, tricky for IEP teams, including the family. Add in the changing nature of educational services during the COVID-19 pandemic, and placement decisions become challenging, if not overwhelming, for IEP teams. This document is intended to help IEP teams clarify the factors to be considered when determining placement during continuous learning/virtual and hybrid delivery of general and special education.

The simplest placement decisions will occur when all students are receiving services through continuous learning/virtual delivery. Because all students are receiving education at home, there is a location change but not a placement change. Receiving services at home while districts are providing continuous learning to all students should not be confused with home services as an IDEA placement option. Home services as defined in IDEA occur when general and special education are provided in schools or related facilities. Home services, then, will not be a placement option until districts return to providing all services in schools and related facilities. (This does not apply to students who were already receiving home services prior to the pandemic).

IEP teams will be challenged with location/placement decisions as schools begin to provide general and special education services in schools on some days and virtually on others (hybrid model). Some eligible students will not be able to transition well between the two types of learning environments, some will be too at risk to be with others, and some will need physical support and prompting to learn. This means some students may need to continue to receive all services at home, and some may need to receive all services at school.

While schools are providing hybrid services to all students, IEP teams will need to consider whether FAPE can be provided in both on-site and virtual services. (See FAPE Considerations for ways FAPE may be provided through continuous learning/virtual and hybrid services). If the IEP team determines that the student needs to participate in a manner different from that of all students, the IEP team will need to follow the processes for a change in placement. Table 1 demonstrates the IEP implications for a hybrid model with 2 days on site and 1 day virtual for all students.

**Table 1. IEP Implications for Hybrid Model with 2 Days On-site and 1 Day Virtual**

| Student Participation   | IEP Implications  |
|---|---|
| Student participates in same manner as all students (i.e., 2 days on site, 1 day virtual)                                       | Location change. No additional documentation needed in IEP.   |
| Student participates in a different manner as all students: virtual only (i.e., 1 day virtual, up to 2 days additional virtual) | Placement change. Additional documentation and PWN needed, unless the IEP team has completed Page I for this situation. |
| Student participates in a different manner as all students: on-site only (i.e., 2 days on site, 1 additional day on site)       | Placement change. Additional documentation and PWN needed, unless the IEP team has completed Page I for this situation. |

## Home Services During COVID-19

Districts might return to completely providing general and special education in schools and related facilities while there is still some risk of contracting COVID-19. In this scenario, families may wish to keep their child at home either because the individual is at increased risk, has an underlying medical condition which necessitates taking extra precautions, or to keep others in the home safe from infection.

IEP teams that decide that an eligible student should receive home services must follow the procedures outlined in IDEA. During the COVID-19 pandemic, an eligible individual who is at increased risk or has an underlying medical condition that necessitates taking extra precaution is considered to have a medical condition that keeps them from participating in the general and special education provided in schools or related facilities and could be provided special education instruction and support services at home.

Designated students must satisfy the following:

- The service and location of the service shall be specified in the individual's IEP.
- The status of the individual shall be regularly reviewed, as determined by an IEP team, to verify the continuing need for specific services and supports.
- Procedural safeguards shall be provided to individuals receiving special education and related services through itinerant services in a home or hospital setting.

Given the rapidly changing conditions of the COVID-19 pandemic, it will be particularly important for the IEP team, including the family, to establish frequent reviews to determine the continuing need or change in specific services, supports, and settings.

For eligible students who are not at increased risk nor have conditions which necessitate taking extra precaution but whose families are concerned about infecting others in the home, first consider what options under these circumstances are available to all students, such as those available under Senate File 2310. If the option is available to all students, what adjustments are required for a student to receive a FAPE? If an option is not available to all students, is it necessary for the child to receive a FAPE?