



Washington State Association of School Psychologists

Revised WSASP Guidance for Special Education Evaluations during the COVID-19 Closure

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WSASP Guiding Principles

Mission

Uniting school psychologists to support all students through advocacy, leadership and professional development.

Vision

School psychologists are an integral and dynamic force in fostering student success.

Values

- Social Justice*
- Problem Solving
- Whole Student Focused
- Collaborative Communication
- Integrity
- Advocacy
- Courageous Leadership
- Continuous Improvement

**WSASP endorses and operates from the National Association of School Psychologists' (NASP) [definition of social justice](#)*

Land Acknowledgement

WSASP acknowledges the commitment of all Pacific Northwest Tribes to the resurgence of their traditional ways and their respect and protection of all peoples, not only those who are living, but also those who have gone before and who are yet to be born. We pay our respect to the elders both past and present and to a valued resource the Tribes have defined as their children. They are the Tribes' future. They are the future for us all. We raise our hands to all sovereign Tribes who have stewarded these beautiful lands throughout the generations. We ask each of you to show gratitude to the Tribal Nations where you are currently located.



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Introduction

The Washington State Association of School Psychologists (WSASP) recognizes that in the current unprecedented times, all school staff are being asked to do our work in different ways. School psychologists have a long history of being flexible and focusing on the needs of our students, while adhering to strict legal requirements. It is with this focus on student needs that we have developed this guidance paper.

Much of our typical work as school psychologists involves observing students in their natural environment in the classroom and working with them one-to-one in order to understand their strengths and challenges cognitively, academically, and in social/emotional/behavioral areas. School psychologists are now trying to develop new ways to gather this same information indirectly from parents/guardians and teachers.

School psychologists in Washington are taking into account guidance from the U.S. Department of Education (US DOE), the Office of Special Education Programs (OSEP), the Washington Office of the Superintendent of Public Instruction (OSPI), and the National Association of School Psychologists (NASP) to inform their practice. School psychologists must be mindful of the legal mandates, ethical requirements, limitations and requirements of confidentiality, issues of equity, and the need to make decisions based on valid and reliable data. School psychologists should also consider that students with a variety of intersecting needs may have a higher magnitude of impact, including but not limited to students learning English, students with disabilities, students experiencing poverty, and students of color experiencing racial trauma.

WSASP encourages all school psychologists to continue to take our Child Find obligation seriously and ensure that students with disabilities are identified and provided the services they need, while maintaining the health and safety of students, staff, and families during this exceptional time.

As school psychologists, we are kind and caring, we try to help others, and we are flexible and solution-focused. During school closures, we have to use all of our coping skills and be prepared to be more flexible than ever before. In this time of rapid change, please consult the WSASP Prior Written Notice e-newsletter for further updates and recommendations, in addition to new or updated OSPI guidance.



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Evaluation Guidance for Teams

WSASP has provided guiding questions for evaluation teams to consider on a case-by-case basis for initial evaluations or re-evaluations during the Pandemic. In special education, each case is unique, and there is no one-size-fits-all answer. **These guiding questions are not intended to contradict or supersede rules being set by your district administration or OSPI, but are offered as a resource for your work within your district in determining how to best move forward. You should work with your administrators to determine how to proceed at this time.**

- What is best for the student?
- Does the team have means to access all the data *needed* to complete this evaluation?
- Is the parent or adult student comfortable proceeding with an evaluation during this time?

What is best for the student?

The evaluation team should consider if services are required to ensure that the student's needs are being met in their least restrictive environment. Initial evaluation teams are looking to establish eligibility. Re-evaluation teams may wish to consider adding a service, removing a service, or recommending a change of placement that was already in the process of consideration. Re-evaluation teams should also consider if the student continues to need specially designed instruction to make meaningful progress in the general education setting. Evaluation teams are also encouraged to consider the "stranger test." If the student moves to a new district, the receiving team should have adequate data in the existing paperwork to set up an appropriate program for this student.

What data is needed to complete the evaluation?

Evaluation teams are required to document evidence that a student demonstrates a need for specially designed instruction. Traditionally, there has been a reliance on individually administered standardized achievement tests in initial and re-evaluations across Washington State. While this has been our practice as school psychologists, it is not legally mandated that this testing be completed for most categories (See the [Establishing Eligibility for Specific Learning Disability \(SLD\)](#) section for guidance on how to proceed with initial SLD evaluations). This evidence can be built on relevant existing data. Evaluation teams should establish if the student is at grade level and able to access general education curriculum in the areas of concern. If the team collects data to demonstrate that the student is not meeting grade level expectations, student need may be established. See [Appendix B](#) for recommendations on existing information.



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For initial evaluations, cognitive testing is only required for specific categorical determinations (developmental delay, specific learning disability in a severe discrepancy model, and intellectual disability). In most re-evaluation circumstances, cognitive testing is not required. It may be considered common practice to conduct cognitive assessments in order to validate previous testing by the team or to rule out one of those listed conditions when evaluating for another category; however, this is not legally mandated. School psychologists may wish to evaluate their practices to consider if cognitive testing is truly needed for each evaluation and what value additional testing is adding to the student's educational plan.

For assessment in the areas of adaptive, social-emotional, or behavior, school psychologists typically use direct observations or observational data in addition to survey or questionnaire data. Direct observational data may not be possible at this time and is not required to move forward with an evaluation. In addition to informal information gathering with team members, school psychologists should continue to have access to a variety of teacher, student, and parent/guardian questionnaires, which can be administered remotely online or as an interview. School psychologists should consider the assessment manual directions regarding who should complete rating scales (i.e., how long has the rater known the student). Parents are likely to be a primary source of data during online continuous learning, as teachers of students who attend school virtually may not have enough observational time with the student to meet the norms/standardization of the instrument being used. **WSASP encourages school psychologists to refrain from scanning and emailing the protocols to team members to complete, as this is a violation of copyright ([NASP Principles of Ethics, Standard II.5.3](#)).** **WSASP also encourages administrators to support school psychologists by providing appropriate tools needed to continue their work at this time.** Many test publishers are making their digital libraries easier to access during this crisis.

The Washington Administrative Code (WAC) requires a comprehensive evaluation in all areas of suspected disability, even those that are not commonly linked to the disability in question ([WAC 392-172A-03020](#) sections e and g). This may become a challenge if data is needed in a given area, including if a related service provider needs direct testing, but the rest of the evaluation team is able to move forward. Here, again on a case-by-case basis, evaluation teams must problem solve in a collaborative manner.

Input from parents and students has always been an important part of a comprehensive evaluation, but in times when it may be more difficult to do observations and collect some of the information we usually include in evaluations, the parent and student input becomes even more important. Interviewing parents and explaining what information will be included in the evaluation and what data (such as individual cognitive assessment) might not be used at this time will help the parents to understand the evaluation process and help to ensure that parents have had the opportunity to share their concerns about their student and their observations of



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how the student has performed during remote instruction. Students who are old enough to have some awareness of their own learning process can share their observations about their strengths and challenges for both in-person and remote instruction. See [Appendix C](#) for resources and sample of parent and student interview forms.

Is the parent/guardian or adult student comfortable proceeding with the evaluation?

Parents/guardians and adult students who are their own guardians have the right to decline an evaluation. If the evaluation team feels ready to proceed, but the guardian denies this, the school team is obligated to honor that decision. ([OSPI Q-A 7/10 E-1](#)). School psychologists should work with their district to determine how to document this decision, although a Prior Written Notice (PWN) may be the minimum that should be completed.

Special Education Referrals

If a student is referred for an initial special education evaluation, the school psychologist should contact the parent/guardian to identify and discuss the specific concerns. A referral team meeting should also be scheduled, including the parent/guardian, administrator, special education teacher, school counselor, and general education teacher(s) to discuss what information is available. The team may wish to invite the general education teacher from the previous year to provide insight to the student's performance. The general education teacher(s) should be able to speak to what skills and behavior were observed in the classroom. Parents/guardians can provide a developmental history, medical history, and an overview of academic skills and behavior. The administrator may be able to speak to any discipline concerns and provide additional information. The school counselor may have additional information about the family and the child.

Teams have an ethical responsibility to consider the evaluation carefully in the climate of a global pandemic and the accompanying disruption to general education instructional access for students. **A lack of instruction is not a disability nor is exposure to trauma due to COVID-19.** Important considerations include the impact of online learning during school closure and the student's present levels compared to other students in their grade level or class, as well as to their levels of performance prior to school building closure.

Evaluating Evidence of Adequate Instruction

The obligation to rule out lack of appropriate instruction in reading and math has not been removed by the COVID-19 school closures. We still have a professional responsibility to consider access to appropriate instruction prior to concluding that a lack of progress is due to a



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disability. Particularly during the time that students are engaged in distance learning, answering this question requires consideration of a variety of sources of information. Consider the [RIOT ICEL model](#) to help in this process. Below is a list of considerations for demonstrating adequate instruction:

- **What did the data say about the student's learning prior to the spring building closure?** See [Appendix B](#) to see WSASP's recommendations for existing data sources. The location of these data will vary based on your district or building. Note that CEDARS has all state test scores earned by a student while in the state of Washington. Student moves between schools should also be considered.
- **What does the data say about the student's learning during the building closure, including spring 2020 and this school year?**
 - **What expectations were set for this student's class?** This may have two separate answers. How often did the class meet, what assignments were given, and what were the teacher expectations for participation or engagement?
 - **How did the class in general respond to those expectations?** Teams should consider what percentage of the class regularly logged in, what percentage completed assignments, etc.
 - **What data has been collected during remote instruction to assess the student's engagement with and response to instruction?** Possible sources of information may include: Distance Learning Platform (Canvas, SeeSaw, Teams, etc.) log-in data, assignment completion, participation and presence during classroom instruction (remote or in person), observation, etc.
 - **How did the student in question meet those expectations based on the above data?** This can be provided in comparison to the class at large, as with local norms but on a very small scale.
 - **What data has been collected using assessment tools, and how has the student performed compared to others in their class, grade, and school?** For example, Curriculum Based Measures may be collected. If possible, the district should work to develop local norms. If not, compare the student's scores to their class, grade, and building's scores as well as to the norm group.
- **Have interventions been completed?**
 - What range of intervention is available at the school/grade level for the areas of concern?
 - Have teachers been given instruction on how to conduct Tier 1 and Tier 2 interventions on a virtual platform?
 - What interventions are available to this student?
 - How are students identified for intervention? What data was used to determine eligibility for the intervention?
 - If the student is not receiving interventions, was the student determined to be ineligible for interventions? Why?



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- What interventions have been in place specifically for this student? For how long?
- Was data collected prior to the intervention?
- What progress monitoring data was collected during the intervention?
- Does the data indicate that the student is making progress? How do you know?
- Does data indicate sufficient growth to close the gap?
- Has the student been making slow progress in intervention for two or more years and still not closed the gap?
- **Has the intervention gone through a data-based intensification process?** See the [NCII website](#) for more information on this process as it pertains to academic interventions and the demonstration of adequate instruction. If a student is in an intervention and is not demonstrating progress, the team should consider the fidelity of implementation of the intervention. If that is not a concern, then the team should intensify or change the intervention based on the hypothesized need, for example:
 - Needs more time: Increasing the time or frequency of intervention (dosage)
 - Needs more opportunities to respond: Reducing the group size
 - Is not engaging: Implementing a behavioral intervention if that is the need
 - Too broad: narrow the focus of the intervention

An intervention or intervention change should be implemented for a minimum of six to eight weeks with weekly progress monitoring in order to reliably determine effectiveness. A reliable trendline should have eight to ten data points. Two intervention changes are recommended prior to consideration of a disability as the cause, though this is an individual determination.

- **Does this student have any other intersecting needs?** The referral team should consider factors such as poverty, cultural and linguistic diversity, and students of color experiencing racial trauma along with the possibility of trauma related to COVID-19. If there are other intersecting needs, consider available data around those needs. (For example, if the student is an English Language Learner (ELL), how have they progressed on the state ELL assessment, how is their progress in the ELL instruction, what services do they receive, etc.)

Initial Evaluations

If the referral team agrees that an evaluation is appropriate, and parent/guardian consent is obtained, school teams must then determine if they are able to proceed with the initial evaluation at this time or extend the evaluation until all necessary data can be collected. Evaluation teams are encouraged to use WSASP's [Evaluation Guidance for Teams](#) questions to determine if it is appropriate to proceed with an initial evaluation. More guidance is located in the [Determining How to Proceed with an Evaluation](#) section of this document.



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Part C to B Transition (Age Of Three) Initial Evaluations

Part C to Part B transition refers to children transitioning from Early Intervention services (Part C) to Early Childhood Special Education (Part B) prior to the student's third birthday. OSPI has provided updated guidance in the document [Reopening Washington Schools 2020: Special Education Guidance](#). Additional guidance is available in the document [Provision of Services to Children with disabilities in Early Childhood Programs During a School Facility Closure](#).

Although not all school facilities are currently closed in Washington State, many of the recommendations in this document may be helpful for remote evaluation. Districts remain obligated to complete a timely Part C to Part B transition, with an IEP put in place by the child's third birthday if found eligible for special education. Districts should partner with families through ongoing communication and collaboration to complete the initial Part B evaluation, understanding that the process will not look the same for every student and family and that safety remains the priority.

The evaluation team must also consider alternate ways of gathering additional data to support Part B eligibility determinations, including the use of assessment tools that do not require in-person implementation. Such methods might include:

- Review existing data from Part C agency providers. If the district team believes there is enough current information to complete a comprehensive evaluation and determine Part B eligibility, the district could complete their evaluation using the existing data
- A remote observation of the child with caregiver support during a play session or daily routine
- A checklist or rating scale form completed by phone, remote interview, online administration, or returned by mail delivery
- If face-to-face transition planning meetings are needed, staff should arrange those to be conducted while following health and safety guidelines, including physical distancing

Districts should prioritize the completion of any delayed Part C to Part B transitions that were unable to be completed in spring of 2020 and consider what recovery or compensatory services might be needed for eligible children as a result of the delayed transition. If evaluation data is available in some, but not all areas of suspected disability, school district teams may consider completing a partial evaluation at this time and completing a re-evaluation when schools reopen if parental/guardian agreement is obtained and documented in advance as further described in the [Determining How to Proceed with an Evaluation](#) section.

Establishing Eligibility for Specific Learning Disability (SLD)

Special consideration should be made by evaluation teams if looking to establish eligibility for specific learning disability (SLD) during an initial evaluation or re-evaluation. A majority of school



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districts are still working within the severe discrepancy model for SLD eligibility, with standardized cognitive and achievement testing required to determine eligibility.

The WACs allow for professional judgement in the determination of a SLD ([WAC 392-172a-03070](#)). Professional judgement is defined as determining that cognitive or achievement testing data is not representative of the learner. Documentation should include that assessment results were somehow invalid and include a secondary case of data to support eligibility. If the team has other data to support an eligibility determination, this is an appropriate use of professional judgement. Additionally, OSPI's [Identification of Students with Specific Learning Disabilities](#) document states on page 5 that professional judgement may be used "...when properly validated tests are unavailable." In these circumstances, as further outlined in the [Standardized Assessment](#) section, properly validated instruments may not be available, and the use of those tests may be invalid at this time. These reasons indicate that professional judgement may reasonably be used in these circumstances, without attempted standardized testing.

Developmental Delay Expiration/Age Of Nine Re-Evaluations

Students currently eligible under the category of developmental delay should be re-evaluated if they turn nine prior to their next re-evaluation due date. WSASP encourages evaluation teams to be thoughtful about what eligibility category the team suspects the student will qualify under and use WSASP's guiding questions to develop an evaluation plan.

Teams may do as suggested in the [SLD section](#) of this guidance document and gather existing data to support the use of professional judgement. Evaluation teams may consider the use of data to support a lack of or insufficient response to intervention where specially designed instruction (SDI) provided under the developmental delay category was the intervention. The argument that the student has been receiving intensive intervention (their SDI) for a period of time and continues to be below grade level in that area can support the team's professional judgement that a severe discrepancy could not be obtained due to inability to assess at this time (see [Evaluating Evidence of Adequate Instruction](#)).

Functional Behavior Assessments (FBAs)

For students who are referred with concerns about behavior, or are up for a re-evaluation who have a Functional Behavior Assessment (FBA), and the team agrees that an FBA continues to be needed, evaluation teams will have to be flexible and creative in their problem solving. When updating an existing FBA, school psychologists may work with the evaluation team to add existing data, including progress monitoring from the current plan and details of what has and has not worked to support the student's behavior. If the team can collect sufficient data to provide a current functional behavior hypothesis, they may be able to proceed.



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If the FBA is for a new behavior concern, the team may consider evaluating behavior without using the FBA protocol if there is insufficient data. The team may consider questionnaires, qualitative data, and intervention data. Teams may agree to a functional hypothesis without an FBA for the purposes of informing intervention. Evaluation teams cannot recommend a Behavior Intervention Plan be attached to the IEP without a FBA, but teams may recommend specially designed instruction in the area of behavior and that a FBA be completed if the student does not make improvement with SDI.

Finally, if the team agrees that a FBA is needed and there is insufficient data to complete one, please see the [guidance provided](#) for options on how to proceed with an intent to revise at a later date, and file an extension for the evaluation.

Standardized Assessment

School psychologists spend the vast majority of their assessment duties administering standardized tests. The term ‘standardized’ refers to the effort to have such tests administered and scored the same way every time. Questions are asked, directions are delivered, and queries are made in an identical manner for each administration. Most standardized tests are thus administered in a face-to-face manner. These demands make the administration of standardized testing particularly problematic with current social distancing protocols. The intent of this section is to identify the options for face-to-face testing and to clarify the reasons for WSASP’s limited support for remote administration of standardized tests.

Providing cognitive assessments is a consistent role for school psychologists. The vast majority of these tests require face-to-face assessment with students. The value of administering these tests in the manner prescribed include:

- A high degree of reliability, making the test results more interpretable
- The opportunity to observe testing (problem-solving) behavior of the student
- The ability to maintain student confidentiality
- Extensive training in the administration and scoring of such tests
- Guaranteed equity for students, in terms of being able to access the test
- No other personnel, equipment, or new training necessary, with no demands on family members
- Availability of student and quiet environment free of distraction
- Ability to ensure professional ethical standards of test administration

Recently, the option of remotely-administered, online cognitive testing has surfaced due to the COVID-19 school building closures. The provided list of **values** associated with face-to-face testing becomes a list of **concerns** if the cognitive assessment is conducted remotely. The



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WAC provides guidance about standardized assessments, stating that school psychologists should use technically sound instruments, which are used for the purposes for which the assessments or measures are valid and reliable, and which are administered by trained and knowledgeable personnel ([WAC 392-172a-03020](#)). While school psychologists are trained to administer these assessments face to face, remote assessment procedures and physical materials are different and require specific training. Most school psychologists lack adequate training to provide remote assessment at this time. Existing testing kits and materials are not appropriate to use in a remote assessment setting and are not valid when used in this manner.

Additionally, distractions that take place in the home, the availability of a trained adult to proctor materials in the home, lack of confidentiality, additional technology and psychologist training required, and prohibitive cost all result in a situation that may violate the [NASP Principles for Professional Ethics](#), and this may result in invalid results that do not reflect student ability level. Remote assessment could be a strategy adopted over time, but it will require significant investment in materials and training to be a viable option producing valid results.

There is a further and final consideration for the use of direct standardized assessment with students during this extraordinary time: we are all experiencing a time of crisis. Most school psychologists will refrain from testing students prior to a break, during preferred classes or activities, after a trauma in the family, or after a school crisis. School psychologists refrain from testing in these circumstances due to concerns that students do not perform their best under those emotionally trying circumstances. The COVID-19 pandemic is a school crisis, a home crisis, and a public health crisis. COVID-19 is extraordinary in how it has impacted everyone's daily lives. To administer a standardized assessment in this time and presume the results are generalizable to a student's typical ability may be unjustified. School psychologists must consider the appropriateness of any assessments we give in these circumstances.

WSASP recommends that school psychologists and evaluation teams carefully consider the need for current cognitive assessment as part of the current evaluation. The team should consider past data that may reflect current levels of cognitive functioning, as well as if the suspected disability category requires cognitive assessment. If such assessment is required, evaluation teams should consider those options outlined above in the [Determining How to Proceed With an Evaluation](#) section to complete the evaluation in the fall.

If the evaluation team has decided that in-person individual standardized assessment is needed, the school psychologist should advocate for a clear protocol of safety provisions and make sure that the parent and student understand the risks and benefits of the in-person assessment. See the [Professional Advocacy](#) section below for more information. In the evaluation report, a description of the procedures and how they differed from standardized assessment procedures should be included in the testing observation section.



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If the evaluation team has decided that remote assessment is needed, it is recommended that the administration procedures match those used in the available literature as closely as possible and interpretation is done with caution. In addition, please consider the following recommendations which are based on existing empirical evidence ([Appendix D](#)), as well as NASP and APA guidance:

- Include information about the current state of literature and limitations during the informed consent process of an evaluation.
- Expand rapport-building questions and consider use of a student interview before testing. This may provide insight about the student's experiences during the pandemic and provide general information about their mental state during assessment.
- Consider more conservative interpretation by widening confidence intervals (ie. 95% or 99%) to increase the probability of capturing the student's true score. Keep in mind that increasing confidence intervals also increases the variability of possible true scores. This practice may also warrant further explanation in the evaluation report.
- As always, school psychologists should triangulate data from multiple sources, including performance in previous school years and using local and progress norms when possible.

Professional development on remote assessment is accessible through WSASP's [Virtual Summer Institute](#) August 18, 2020, and [Fall Conference](#) October 15-17, 2020. Most sessions from these events will be available by recording with registration for the event.

Observations

Many school psychologists promote the practice of observing each student they evaluate. Direct observations are common in school psychology practice and considered best practice in many situations; however, an observation is only legally required for an initial SLD evaluation ([WAC 392-172A-03075](#)). Observation is also noted in the Review of Existing Data section for evaluations and re-evaluations ([WAC 392-172A-03025](#)). This indicates the team should consider "Observations by teachers and related services providers" as part of that review.

Regarding the required observation for an initial SLD evaluation, the WAC states that the evaluation group can "use information from an observation in routine classroom instruction and monitoring of the student's performance that was done before the student was referred for an evaluation..." This suggests that if staff have observational information from an intervention process, that could be used in this situation. While the required observation is to help the team determine the "access to adequate instruction" question, it is primarily focused on "the relevant behavior, if any, noted during the observation of the student and the relationship to that behavior to the student's academic functioning" ([WAC 392-172A-03080](#)).



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Teams may consider observing the student reading to a family member during an online conference, or observing if the general education teacher is providing direct academic services through distance learning. Teams may also ask a teacher who has worked regularly with the student to provide general observational notes about how the student performed in class on a typical day. School psychologists could provide guiding questions about time spent on-task or the student's ability to work independently. The input would be based on the teacher's observation, not the school psychologist's.

The evaluation team, including the parent/guardian, may also discuss and agree to remove an observation from an evaluation plan previously agreed upon. The decision to waive a component of the evaluation documented on the consent form must be documented in a PWN. The team should work to obtain written parent/guardian permission for this change, similar to other consent documentation procedures during this closure.

Collaborating With Other Professionals

School psychologists regularly chair evaluation teams and facilitate multi-disciplinary team meetings with other special education and general education staff members. WSASP recognizes that other educational staff associates (ESAs) that participate on these teams have separate codes of ethics for their professions, which are to be respected. These ethical requirements may not always align with WSASP's recommendation or guidance, especially regarding how and when to complete assessments for a comprehensive evaluation. The guidance WSASP has laid out applies to school psychologists only. **WSASP encourages school psychologists to engage in positive and productive conversation with team members and families in order to reach a mutual agreement about how to proceed on a case-by-case basis** ([NASP Principles for Professional Ethics, Principle III.3.](#)).

Determining How to Proceed With an Evaluation

Evaluation teams must make a good faith effort to complete evaluations prior to their expiration date when this is possible ([OSPI Q-A 7/10 E-4, E-5](#)). It is important to meet existing deadlines to serve our students appropriately. Keep in mind that the purpose of a re-evaluation is to determine continued need for special education and to outline those needs, not to re-establish eligibility ([WAC 392-172A-03025](#)).

When answering the three guiding questions for an evaluation, many evaluations will be able to move forward using a review of existing data, and data collected remotely or in person with all safety guidelines followed. **As of fall of the 2020-2021 school year, there are only two options for how to proceed with an evaluation when a team agrees they cannot obtain adequate data for decision making purposes.**



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The first option is available if evaluation data is available in some, but not all areas of suspected disability. Evaluation teams may consider completing a partial evaluation prior to the evaluation expiring, with the written and explicit intention of completing a re-evaluation revision when the data collection can be completed. This can only take place if the parent/guardian is in agreement, and the agreement is documented per district approved methods, such as a prior written notice. This does mean the evaluation may not be comprehensive; however, it does address all areas of concern and provides a documented solution.

The second option is that the evaluation team may open an evaluation and file an extension. OSPI had provided guidance for this process ([OSPI Q-A 7/10 E-1](#)). If a member of the team is not able to complete a necessary portion of the evaluation, or more time is needed in order to gather data and parent/guardian agrees, the evaluation team may extend the re-evaluation process. During the exceptional situation of school closures in Spring 2020, OSPI had indicated that evaluation teams may extend a triennial re-evaluation past the expiration date ([OSPI Q-A 3/24 E1 and E5](#)). **This is not an option for the 2020-2021 school year, as IDEA is expected to be fully implemented.** An extension can be filed for a re-evaluation with parental/guardian agreement so long as the final completion date is before the expiration date ([WAC 392-172A-03015](#), section 3). **The extension cannot extend beyond the expiration date for any reason.** This is a change from the guidance provided in Spring 2020 from OSPI, which indicated “OSPI does not plan to identify issues of noncompliance through monitoring based on timelines that were missed as a result of the COVID-19 outbreak” ([OSPI Q-A 7/10 E-2](#)). In Spring 2020, OSPI gave districts 30 school days after school resuming in Fall 2020 to complete paperwork that was not done due to the closure, including IEPs and re-evaluations ([OSPI Letter 3/18](#)). **This 30 school day timeline must be met this fall, regardless of service delivery model.**

The third option, recommended in Spring 2020, was to delay the evaluation entirely. **This is no longer an option for the 2020-2021 school year.** Evaluations which were delayed under this guidance must be completed within 30 school days of school starting this fall, regardless of service delivery. Refer to the former two options on how to complete these evaluations.

Logistical Concerns

The school psychologist should use communication tools made available to them by their school district, including email, phone calls, online meeting platforms, or conference calls. When teams meet remotely, there are four logistical concerns that pertain to our processes and paperwork: obtaining written consent, the signature page typically signed at the time of meeting, school day timelines, and Federal Education Rights and Privacy Act (FERPA) protections during remote meetings.



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To obtain consent for an evaluation, OSPI is allowing written permission to include: email, digital or e-signature, digital photograph or scan of a parent/guardian signature on an applicable document, or district staff noting temporarily that consent was given verbally ([OSPI Q-A 7/10 E-3](#)). If the team proceeds with verbal consent, an attempt to mail the form and have it mailed back with written consent is recommended. There continues to be the option for proceeding without consent in the event that you are not able to get in touch with families during this time.

For obtaining signatures for evaluations, OSPI is encouraging districts to explore digital platforms to use for signatures; however, many districts are not able to support this. Teams should document team members in attendance and their method of participation. Meeting attendance can be documented on the signature page and should also be in the PWN. Please check with your district administrators to determine your local plan for these issues.

Clarification about what counts as a school day should come from the school district. If the school district is providing continuous learning opportunities, then they are likely to be considered school days. “In the fall of 2020, districts employing a model that provides education and special education services through in-person, continuous learning, or a combination of both, should count all days educational services are offered as school days for the purposes of meeting special education timelines” ([OSPI Q-A 7/10 E-2](#)). OSPI is not monitoring timelines missed as a result of COVID-19, but timelines may be a concern in some situations, such as with a due process filing ([OSPI Q-A 7/10 E-2](#)).

Though we are in a time of crisis, our students are still entitled to their privacy. FERPA requires particular security around access to and sharing of special education information. This law, however, predates most social media and technology. OSPI has released [information for districts](#) to consider in how to proceed with online conference programs such as Zoom. Companies are also providing users with information for how to arrange the settings of their programs for maximum security. WSASP encourages school psychologists to engage their districts in discussion to ensure student privacy before engaging in private conferences on platforms which may be insecure.

Professional Advocacy

To support school psychologists in improving advocacy skills to support change at the team, building, and district level, WSASP has created the [Self-Advocacy Toolkit](#). Another resource for advocacy is the [ESA Behavioral Health Coalition position paper](#) pertaining to meeting the needs of students, staff, family and community during the COVID-19 Pandemic. WSASP anticipates the need for professional advocacy for the school psychologist role in two broad areas: in-person standardized assessment and a multi-tiered system of supports (MTSS) with student intervention.



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In-Person Standardized Assessment

If the district is proposing that school psychologists see students in person when teachers are not seeing students in person, the union representative should be consulted to review the process being considered. Some school psychologists may **choose** to see students in-person in an environment that is safe for the student and school psychologist, based on their collective bargaining agreement. If the team decides that in-person standardized assessment is needed, the school psychologist must advocate for personal protective equipment and a safe testing environment.

Considerations for in-person assessment include, but are not limited to:

- Do you have a room where the student and examiner can sit six feet apart?
- Does the space have good ventilation? Can windows or doors be left open while maintaining confidentiality and a quiet environment?
- Can the room and all equipment be sanitized before and after testing? Are disinfectant wipes and cleaner available?
- Some districts have designated a room or rooms in the district office or one school for testing; if so, will there be transportation provided to the testing site?
- If the parent is transporting the student, will they wait for the student or provide a cell number where they can be reached?
- What is the district's response if parents want to be in the room during the assessment?
- Will the district provide masks, face shields, plexiglass table divider, and a reacher/grabber tool for moving test materials across the table?
- Is there a system for taking temperatures of staff and students as well as a health questionnaire to look for other possible symptoms of illness?
- How will materials be shared between the student and examiner? Do you need additional sets of blocks and stimulus books?
- If there is a single location for testing, is there a procedure for scheduling the space?
- Will the student keep their mask on?
- Can the student hear and understand the examiner when they are wearing a mask? This can be especially important on tasks requiring the student to repeat back information.
- Consider getting masks with a clear plastic insert for the examiner to wear for tasks when the student may need to see the examiner's lips.
- After testing, is there a place to store the materials that were touched by the student to let any possible virus die before the examiner touches the materials?
- Can the examiner wait several days or sanitize the test materials before scoring the test and using the materials again?



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MTSS With Student Intervention

Throughout the 2020-21 school year and beyond, school psychologists must be strong advocates for implementation of MTSS in our public schools. MTSS is a critical tool to ensure equitable educational opportunities for each and every student in our state, but also to enable us to complete comprehensive evaluations in the absence of our usual standardized assessments. OSPI has encouraged the implementation of MTSS in school districts, and school psychologists have the power to be change agents and support the implementation of MTSS procedures within their buildings ([OSPI MTSS webpage](#)).

Summary Statement

In closing, WSASP encourages school psychologists and school teams to be flexible, collaborative, and thoughtful about supporting individual student needs during this time. If you have any questions that were not addressed through this document, [please submit your question using this form](#). Someone from WSASP's response team will respond within two days. Questions and responses will be posted in the Prior Written Notice e-newsletter.

In these uncertain times, it can be difficult to remember that the COVID-19 Pandemic will end, and that school closures will be temporary. We can take comfort in knowing that the fundamentals of our work will not change. We will continue to collaborate with school staff, students, and families. We will continue to complete evaluations with multiple sources of data outside of standardized assessment. We will continue to advocate for equitable educational opportunities and instruction for each and every one of our students. We will be better practitioners in the future for having this shared experience.



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Appendix A: Additional Resources

- National Association of School Psychologists (NASP)
 - [Telehealth: Virtual Service Delivery Updated Recommendations](#)
 - [Principles for Professional Ethics](#)
 - [Ask the Experts Webinar Series](#)
- Washington Office of Superintendent of Public Instruction (OSPI)
 - [Questions and Answers: Provision of Services to Students with Disabilities During School Closures for COVID-19](#) (Cited as OSPI Q-A 7/10)
 - [Guidance Regarding IEP Reviews During Covid 19 3/18](#) (Cited as OSPI Letter 3/18)
 - [Special Education Planning For Reopening Washington Schools 2020](#) (Cited as OSPI SPED Reopening Guide)
- [National Center on Intensive Intervention](#)
- Team Initiated Problem Solving (TIPS-II)

Appendix B: Review of Existing Information Sources

WSASP has compiled a list of sources of existing information that school psychologists may wish to consider as part of their evaluation process, in lieu of new standardized assessment:

- State Assessment Data (e.g. SBA)
- District Progress Monitoring Data (STAR, Renaissance, EasyCBM, iReady, etc.)
- Review of current IEP goals and progress monitoring from report cards
- Input from general education teachers regarding individual student needs
- Input from special education teachers regarding individual student needs and progress toward IEP goals not reported at report cards
- Grading data from prior to school closures (e.g. percentage of missing assignments, performance on tests and quizzes) as well as transcript of classes taken and grades
- Summary of changes in services (e.g. if additional supports were added such as more time or check-in check-out before the school closure)
- Review of previous evaluation data (e.g. the student's performance at the time of their last full evaluation)
- Attendance history
- ELPA21 Testing Results (if appropriate)
- Office/Discipline referral data (if appropriate)
- Review of previous vision/hearing screenings
- Input from students and parent/guardian
- Review of pre-vocational skills (secondary)



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Appendix C: Parent and Student Interview Resources

As part of a comprehensive evaluation parent, student, and educator input is critically important. During the COVID-19 Pandemic this is more true than ever. WSASP has put this brief list of interview protocols together to help school psychologists obtain this input by either using existing interview protocols, or using these examples to create a protocol that makes sense for your school system and community. This list includes examples for a range of student ages, LRE settings, and pertaining specifically to COVID, or more general interviews and forms; but is by no means comprehensive.

Parent Interviews:

- [Evaluation Interview Forms Differentiated by Eligibility Category](#) (Source: Itasca Area Schools Collective)
- [Parent Interview Form](#) (Source: Frederick County Public Schools, MD)
- [Suggested Questions for Parent Input for Re-Evaluation](#) (Source: Ionia County Intermediate School District)
- [Semi-Structured Interview](#) (Source: Whittier Area Cooperative Special Education Program)
- [FACTs \(specifically for behavior\)](#) (Source: PBIS)
- [Quick Developmental Interview](#) (Source: Federal Way)
- [Parent Transition Questionnaire](#) (Source: National Service Inclusion Project)
- [Brief Parent Interview](#) (Source: Carrie Suchy)
 - Consider completing with developmental interview
- [COVID 19 Impact Parent Interview](#) (Source: Riverside Insights)

Student Interviews:

- [All Things Possible](#) (Source: Individual Transition Plan material, California)
- [Student Interview](#) (Source: rodspecialeducation.org)
- [FACTs \(specifically for behavior\)](#) (Source: PBIS)
- [Collaborative and Proactive Solutions Model](#) (Source: Ross Greene)
- [COVID 19 Impact Student Interview](#) (Source: Riverside Insights)

Teacher Interviews:

- [COVID 19 Impact Teacher Interview](#) (upon return to in-person instruction) (Source: Riverside Insights)
- Student Information Questionnaires, to be completed by educators, all created by Carrie Suchy. For all digital forms, the links go to a template you can save and manipulate at your own judgement. For all paper forms, please be sure to edit out my name, and check any other information that might not match your current system.
 - General Education Teacher
 - Elementary: [Paper form](#), [digital form](#)



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- Secondary: [Paper form](#), [digital form](#)
- Modified for students in Life Skills type programs: [Digital form](#)
- Special Education Teacher: [Paper form](#), [digital form](#)
- English Language Learner Teacher: [Paper form](#)
- Counselor/Social Worker: [Paper form](#)

Other

- [COVID 19 Impact Checklist](#) (Source: Riverside Insights)

Appendix D: Remote Assessment Literature

Articles

- Daniel, M., & Wahlstrom, D. (2019). Raw-score equivalence of computer-assisted and paper versions of WISC–V. *Psychological Services*, 16(2), 213–220.
<https://doi.apa.org/doiLanding?doi=10.1037%2Fser0000295>
- Farmer, R. L., McGill, R. J., Dombrowski, S., Benson, N. J., Smith-Kellen, S., Lockwood, A. B., Powell, S., Pynn, C., & Stinnett, T. (2020a). Conducting psychoeducational assessments during the COVID-19 crisis: The danger of good intentions. *Contemporary School Psychology*. <https://doi.org/10.1007/s40688-020-00293-x>
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- National Association of School Psychologists (2020). Telehealth: Virtual Service Delivery Updated Recommendations.
<https://www.nasponline.org/resources-and-publications/resources-andpodcasts/covid-19-resource-center/special-education-resources/telehealth-virtual-service-delivery-updated-recommendations>
- Wright, A.J. (2020). Equivalence of remote, online administration and traditional, in-person administration of the Wechsler Intelligence Scale for Children – Fifth Edition (WISC-V) *Psychological Assessment*, 32(9), 809-817.
<https://psycnet.apa.org/fulltext/2020-54568-001.pdf>
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https://www.presencelearning.com/app/uploads/2016/09/WJ-IV_Online_Remote_whitepaper_FINAL.pdf
- Wright, A. J. (2018). Equivalence of remote, online administration and traditional, face-to-face administration of the Reynolds Intellectual Assessment Scales-Second Edition. [White



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paper]. Psychological Assessment Resources, Inc.
<https://www.parinc.com/Products/Pkey/365>

Wright, J. A., Mihura, J. L., Pade, H., & McCord, D. M. (2020). Guidance on psychological tele-assessment during the COVID-19 crisis.

<https://www.apaservices.org/practice/reimbursement/healthcodes/testing/tele-assessment-covid-19>

Podcasts

Sharp, J. (Host). (2020a, April 3). Remote administration of the WISC-V & KTEA-III with Dr. Susie Raiford. [Audio podcast]. The Testing Psychologist.

<https://www.thetestingpsychologist.com/remoteadministration-of-the-wisc-v-ktea-iii-w-dr-susie-raiford/>

Sharp, J. (Host). (2020b, April 8). APA guidelines for remote assessment with Dr. Jordan Wright. [Audio podcast]. The Testing Psychologist.

<https://www.thetestingpsychologist.com/apa-guidelines-forremote-assessment-w-dr-jordan-wright/>

Comizio, R., Donnelly, R., & Elias, E. (Hosts). (2020, August 2). Pandemic testing and where we stand with remote testing with Dr. Farmer and Dr. Lockwood. [Audio podcast]. School Psyched!

<https://schoolpsychedpodcast.wordpress.com/2020/08/02/spp-109-pandemic-testing-and-where-we-stand-with-remote-testing/>