



# COVID-19 Considerations for Reopening Schools

July 20, 2020

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## Exceptional Learners and Preschool Students

This document is designed to align with the Healthy at School document, [“Guidance on Safety Expectations and Best Practices for Kentucky Schools \(K-12\)”](#) to provide specific considerations for exceptional learners and preschool students.

As schools plan for reopening during the COVID-19 pandemic, it is important to consider the unique needs of all learners. Admissions and Release Committees (ARCs) are responsible for ensuring each student with an Individual Education Program (IEP) has access to the appropriate placements, specially-designed instruction, supplementary aides and services, accommodations and modifications and any other supports and services necessary in order to receive a free appropriate public education (FAPE).

Section 504 teams are responsible for ensuring accommodations are provided for students who have plans under Section 504 of the Rehabilitation Act.

Districts should not expect or encourage sweeping accommodations or changes for all students with disabilities. Rather, any changes to the IEP or 504 plan must be determined by the ARC or 504 team based on individual student data that supports a need for a specific service, support or accommodation.

When modifications to the Gifted Student Service Plan (GSSP) are needed to meet the recommendations in the [“Guidance on Safety Expectations and Best Practices for Kentucky Schools \(K-12\),”](#) districts must consider a student’s individual needs, interests and abilities. The gifted and talented coordinator and teachers should work as a team with classroom teachers, counselors and administrators to identify and provide service options in accordance with state regulation [704 KAR 3:285](#).

Districts must ensure at-risk preschool children have equitable access to preschool services. The preschool program must coordinate and collaborate with Head Start and early childhood partners to actively recruit and enroll eligible children. Parent involvement opportunities should be made available to parents and caregivers, including two (2) way communication regarding the child’s individual needs and progress.

Due to the nature of the COVID-19 pandemic, health and safety information may change rapidly. The Kentucky Department of Education’s Office of Special Education and Early Learning (OSEEL) will provide additional guidance as updated information becomes available from the U.S. Department of Education. Districts are encouraged to continue consulting with local health departments to ensure local policies and processes follow the most current recommended guidelines.



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## Reopening Considerations

### Social Distancing

Districts should consider ways to differentiate instruction for exceptional learners when teaching students about social distancing. Some students may require a variety of prompts or reminders to successfully practice social distancing.

Options to consider when teaching students to practice social distancing:

- Place tape on the floor as a visual reminder of personal space.
- Read or provide social stories to students about the importance of social distancing.
- Provide students access to videos that demonstrate examples of social distancing in multiple settings.
- As a daily reminder, include the steps to following social distancing during school announcements.
- Use gestures to prompt students while practicing social distancing.
- Provide students with opportunities for repeated practice in multiple settings.
- Break down the steps for following social distancing into key components.
- Remember to provide feedback and reinforcement to students practicing social distancing.

### *Students Who Are Blind or Visually Impaired*

Schools should consider students who are blind or visually impaired when designing social distancing reminders. Simply adding Braille to a sign does not ensure the student is able to access the information. Students may not be able to see where the sign is located or may not know how to read Braille.

Schools may consider frequent verbal reminders for students to ensure they are aware of the necessary protocols. Students who are both deaf and blind may need additional supports to access reminders.

### *Preschool Students*

The most current recommendations from Kentucky's Department for Public Health (DPH) do not require preschool students to wear masks throughout the school day, as masks pose a higher risk of strangulation and suffocation for young students and also may increase the risk of improper wearing due to the developmental abilities of preschool students.

While preschool students will not be required to wear masks, they must social distance as much as possible. Classrooms should be set up in a reduced capacity that allow for social distancing. A capacity calculator is included within the "[COVID-19 Considerations for Reopening Schools](#):"



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[Facilities and Logistics](#)” guidance provided by the Kentucky Department of Education (KDE) on June 29, 2020. This calculator can provide support for districts when considering the capacity of each classroom based on the usable square footage.

Other points to consider when planning social distancing in preschool:

- Explain “social distancing” and “personal boundaries” using developmentally appropriate words and phrases.
- To mitigate risk, develop simple routines for preschool students to follow and help students internalize these new routines.
- Use age-appropriate signs and stickers to encourage students and adults to stay 6 feet away from one another.
- Arrange classrooms with enough space between learning centers for small groups and individual play.
- In full-day classrooms, provide at least 6 feet between sleeping mats and cots.
- Avoid large group activities.
- Stagger times for outside play to limit how many classes are on the playground at one time.
- Although students must be spread out, developmentally appropriate instructional materials must be used.

## *Gifted and Talented Students*

Some gifted and talented students may engage in accelerated classes that require them to travel to other buildings within the district. Alternatives to this practice – such as the use of a virtual platform – should be considered while practicing social distancing.

If the district chooses to continue to allow students to travel from one building to another, the [“Guidance on Safety Expectations and Best Practices for Kentucky Schools \(K-12\)”](#) suggests rechecking a student’s temperature when arriving to the building. Additionally, activities that normally require multiple students to engage in an activity that could cause close social contact do not have to be canceled if distance and sanitation needs are met.

Below are some considerations when planning for social distancing while providing gifted and talented services:

- To minimize student movement, consider options such as collaboration and cluster grouping rather than pulling multiple students out of the classroom.
- For visual and performing arts identification and instruction, use a virtual platform or digital recordings.
- Increase space between students by rearranging seating to be 6 feet or greater.



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### *Staff*

Some students with complex needs may require one-to-one assistance as mandated by the IEP. This may include (but is not limited to) assistance with toileting, hand-over-hand assistance, physical transfers, feeding and physical restraint. In these cases when social distancing cannot be maintained, staff must utilize the appropriate personal protective equipment (PPE) as explained below and referenced in the [“Guidance on Safety Expectations and Best Practices for Kentucky Schools \(K-12\).”](#)

When attending to the hygiene needs of students, staff must wear gloves in addition to both a surgical mask and a face shield. Face shields alone do not provide enough protection from the aerosols produced by the nose and mouth. When assisting students with toileting, staff also may consider the use of a surgical gown. Students should continue to wear face masks while staff attend to their hygiene needs unless the student is exempt from wearing a mask. Gloves for students are not required.

When providing hand-over-hand assistance to a student, staff must wear gloves, surgical masks and face shields. The same requirements apply to feeding students. Gloves for students are not required.

Staff working with students who bite others should wear long sleeves. Staff may consider wearing jackets or additional layers to protect themselves.

Some students may require the use of physical restraint to prevent harm to the student or others. In the case of physical restraint, staff should utilize gloves, surgical gowns, surgical masks and face shields. If a core team member has time to don the appropriate PPE prior to the physical restraint, this is preferable. However, there may be cases where safety is an issue and putting on PPE prior to the physical restraint is not possible. In this case, protect the student first, then have someone who is wearing appropriate PPE take over as soon as possible. If PPE is accidentally removed during the physical restraint, the team member should be replaced by another core team member wearing appropriate PPE. Schools should consider assigning a core team member to assist with PPE needs during the physical restraint.

Related service providers who cannot maintain social distancing due to the nature of their work (such as orientation and mobility providers, oral mechanism checks for students with speech impairments and others) must use appropriate PPE in order to protect the health and safety of the provider and students.

Schools are encouraged to think through situations that may require additional PPE and contact their local health department for further suggestions on how to ensure the safety of staff and students.



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## *Transportation*

During transportation when staff need to be in close proximity to students, the [“Guidance on Safety Expectations and Best Practices for Kentucky Schools \(K-12\)”](#) suggests that bus monitors or staff should wear personal protective equipment (masks) when assisting students with on/off loading or with buckling seatbelts. For additional information on transportation, please see [“Considerations for Reopening Schools: Pupil Transportation.”](#)

Preschool students will not be required to wear masks. The DPH suggests the following while transporting preschool students on the bus:

- Temperature checks;
- Proper hand washing and hand sanitizing; and
- Social distancing, if feasible.

## Special Transportation (T5)

The needs of students who receive special transportation, known as a T5 code in Infinite Campus, must be considered when planning reopening practices. A local school district must provide special transportation when the student’s ARC determines that it is necessary to address the individual needs of the student and provide a FAPE. According to [“Guidance for Special Transportation in Kentucky,”](#) there are many factors to consider if the parent of a student receiving special transportation is asked to provide transportation. The local school district must ensure the arrangement is mutually agreeable to the parent and reimburse the parent for transportation costs.

Other factors to consider:

- Parental reimbursement requires prior approval in writing from the district and must comply with the student’s IEP or 504 plan as determined by the ARC or 504 team.
- Expenses incurred by parents who opt to transport the student in a family vehicle are allowable so long as the parent has obtained this formal approval in advance.
- Schools must ensure that any parent providing transportation for a student with a disability has met all district requirements and align with district reimbursement policies.

## Food Preparation and Snacks

Food preparation and snacks are a vital part of promoting physical growth in preschool students. During the COVID-19 pandemic, serving snacks and meals within the classroom poses a unique challenge. Local school districts should consider, [704 KAR 3:410, Section 6 \(12\) \(e\)](#) “... involving children **as feasible** in the planning and preparation of snacks and meals ...” when planning for preschool reopening.



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It is also important to note, the [Centers for Disease Control and Prevention \(CDC\)](#) recommends the elimination of family style meals and having staff serve food to mitigate the spread of germs when preparing food or snacks for students.

When districts are developing reopening plans concerning food and snacks it is important to consider students who may have an IEP or 504 plan that specifies the need for food or drink. Food on the bus may be one environment where this may need to be addressed. In this example, transportation staff must be made aware of these students and that food or drink must be provided as indicated in the IEP or 504 plan, with appropriate precautions taken.

### Instructional Experiences in the Community

Using the community as an instructional setting is a strategy that allows students to use functional and academic skills in an authentic environment. Although an effective strategy, in-person, community-based instruction should be suspended while social distancing policies are in place.

Rather than amending IEPs to remove community-based instruction, districts may consider virtual opportunities as a temporary, alternate method for continuing to provide this type of instruction to students during the COVID-19 pandemic. Field trips to the community also must be suspended, [“Guidance on Safety Expectations and Best Practices for Kentucky Schools \(K-12\)”](#). Schools should consider how to create opportunities for students to have authentic experiences within the school environment.

In gifted education, it is important to continue to provide enrichment, extra-curricular and academic competitions as services. To limit cross transfer between special programs and school staff, consider using virtual platforms for service delivery (e.g., academic competitions, guest artists) and cross-district consortiums.

### Least Restrictive Environment

Local school districts are planning for a variety of instructional delivery models for the 2020-2021 school year, including traditional in-person instruction, periods of complete virtual learning through non-traditional instruction (NTI) and days of blended in-person and remote delivery. Regardless of the district’s chosen delivery model, schools should be cognizant of the effects social distancing may have on a student’s Least Restrictive Environment (LRE). In a small number of cases, long-term remote instruction may have caused a need for the student’s LRE to be reviewed by the ARC. Some students may need a more restrictive environment upon their return. Other students may have done well during remote instruction and will need a less restrictive environment upon their return.



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Practices such as placing all students with disabilities in the same classroom in response to the pandemic may result in a denial of a FAPE. According to [707 KAR 1:350, Section 1](#), which outlines the requirements for placement decisions, the district shall ensure that to the maximum extent appropriate, children with disabilities are educated with children who are nondisabled. A child with a disability shall not be removed from education in age-appropriate regular classrooms solely because of needed modifications in the general curriculum. Placement decisions must be made by the ARC and based on the individual needs of students.

It is important to note, an ARC may not be required to determine a change in placement if the district is practicing non-traditional instruction. Because the instructional setting of the regular classroom becomes remote, the extent to which a student participates in the regular education environment does not change. Therefore, it would be considered a change of location, not a change of placement.

### Cloth Face Coverings (Masks)

According to the [“Guidance on Safety Expectations and Best Practices for Kentucky Schools \(K-12\),”](#) students who are enrolled in 1st grade and above and staff should be required to wear a cloth face covering, unless medically waived. In most cases, students with disabilities should be able to adhere to the requirements for cloth face coverings. However, there will be some exceptions for individual students for whom this is not possible. For some students, it may not be safe to wear a cloth covering due to their age, physical condition or disability.

On considerations for wearing cloth face coverings, the [CDC](#) writes, “In some situations, wearing a cloth face covering may exacerbate a physical or mental health condition, lead to a medical emergency, or introduce significant safety concerns. Adaptations and alternatives should be considered whenever possible to increase the feasibility of wearing a cloth face covering or to reduce the risk of COVID-19 spreading if it is not possible to wear one.”

The CDC provides the following examples and alternatives:

“Some people, such as people with intellectual and developmental disabilities, mental health conditions or other sensory sensitivities, may have challenges wearing a cloth face covering. They should consult with their healthcare provider for advice about wearing cloth face coverings.”

“People who are deaf or hard of hearing – or those who care for or interact with a person who is hearing impaired – may be unable to wear cloth face coverings if they rely on lipreading to communicate. In this situation, consider using a clear face covering. If a clear face covering isn’t available, consider whether you can use written communication, use closed captioning, or





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decrease background noise to make communication possible while wearing a cloth face covering that blocks your lips.”

According to the CDC, cloth face coverings should **not** be worn by:

- Children younger than 2 years old;
- Anyone who has trouble breathing; or
- Anyone who is unconscious, incapacitated or otherwise unable to remove the cloth face covering without assistance.

According to Kentucky guidance, preschool students are not required to wear face masks. Instead, encourage preschool students to protect their personal health and each other’s health by making statements such as:

- Don’t touch your face.
- Sneeze into your elbow.
- Stay home when you are sick.

It may be necessary to schedule an ARC meeting to determine if a student with a disability requires a waiver for wearing a face covering. Wearing a cloth face covering is an essential preventive measure; the ARC waiver decision should be based on the individual needs of the student and not be made unilaterally for students with disabilities.

### School Health Policies

#### *Health Screening*

When developing screening protocols, schools should consider wait times for students with disabilities. Some students may not be able to tolerate long wait times and should be permitted to skip to the front of the line.

Additionally, preschool students are not developmentally ready to wait for extended amounts of time while temperatures are checked. Make sure planning for processes takes into consideration age-appropriate practices.

#### *Sanitation and Environmental Standards*

When planning sanitation practices, districts should consider staff who work with multiple groups of students. For example, a teacher who provides services to students in multiple classrooms will need to sanitize prior to working with a new group of students. Time for sanitizing may need to be built into the teacher’s daily schedule.



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## *Handwashing Procedures*

Develop and follow good hand washing procedures and routines (i.e., when students arrive, before and after eating, after diapering or toileting, after sneezing or coughing). Staff should:

- Supervise and assist with student handwashing. Staff should remember to wash their own hands after assisting preschool student with handwashing.
- Make sure students wash hands often throughout the day, one at a time, maintaining physical distance.
- Make sure students do not re-contaminate hands by touching trash cans or doorknobs.
- Advise students, families and staff to avoid touching their eyes, nose and mouth with unwashed hands.
- Allow hand sanitizing to occur throughout the day with close adult supervision. Hand sanitizer should be kept out of reach of children.
- Ensure students should wash or sanitize hands before and after being on the playground.

## *Instructional Environment*

Assessments for eligibility and identification are often administered to multiple students using the same materials. When conducting assessments, consider these strategies:

- Test booklets should sit out for at least 24 hours. If possible, lay out individually rather than in a stack.
- Sanitize any hard surfaces students will touch such as table, chairs and pencils. This must be done between testing sessions.
- If using keyboards, wipe down keyboards before and after using. Be careful with screens because some sanitizing agents can ruin screens and monitors.
- Students and staff should wash hands before and after testing.

## *Centers in the Preschool Classroom*

Centers may be a challenge to maintain sanitation and social distancing requirements. Districts should take into consideration the following items when planning for developmentally appropriate center work in a socially distanced environment.

- Limit teaching and learning materials to those that can be easily cleaned and disinfected as often as needed.
- Avoid using materials that cannot be cleaned or sanitized, such as playdough.
- Refrain from using water or sensory tables.
- Structure center time (students playing in one center for an allotted amount of time) to help maintain sanitation and social distancing.
- Consider grouping students to rotate through centers in pairs.



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- Keep art supplies in individual containers assigned to individual students.
- Have students wash or sanitize hands before and after each center.
- Limit the number of centers available during the day.

### Contact Tracing

Schools should consider how to best document the movement of students who frequently transition throughout the building in order to support contact tracing. Staff will need to design sign-in systems to document how they moved through a building on a daily basis. Schools who do not take attendance in resource settings will need to begin doing so in order to effectively contact trace.

It is also important to document where staff and students have been and what they used (e.g., laptop in the computer lab). Below are methods for documentation for use in contact tracing to consider when providing gifted services:

- rosters and schedules
- seating charts and line charts
- service logs

Many of the suggested strategies in the “[Guidance on Safety Expectations and Best Practices for Kentucky Schools \(K-12\)](#)” can easily be applied to the preschool setting. For example, keep the same group of preschoolers together throughout the session (half or full day), with the same staff, day to day, as much as possible. Minimize combining classes or groups of preschool students.

### **Waiver to Extend 2018-2019 IDEA Funds**

On June 12, 2020 the KDE was notified by the Office of Special Education Programs (OSEP) in the US Education Department (US ED) that its waiver request to extend the period of availability (POA) of Individuals with Disabilities Education Act (IDEA) funds awarded July 1, 2018 was approved. This waiver applied to funds awarded under Section 611 for School Age programs and under Section 619 for Preschool. The original POA for these funds was from July 1, 2018 through September 30, 2020.

The waiver extended the POA for an additional 12 months through September 30, 2021. This means the KDE and local district sub-grantees will have another full year to carryover these funds to support the operation of special education programs. A similar waiver was granted previously for Title funds but was not available for funds under the IDEA until several weeks



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later. The OSEEL quickly applied for this waiver upon notification from the US ED and received the approval of the extension to the POA in less than a week.

While the POA for the FFY 2018 IDEA funds was extended through September 30, 2021, states and local district sub-grantees will have an additional 90 days after this date to liquidate any unpaid obligations made during the POA. After this 90-day period, any unused funds must be returned to the U.S. Department of Education.

### **Special Education Questions and Answers**

#### Question 1

***Must students with sensory issues, behavior issues or health concerns wear masks? If not, is a doctor's directive required or is it an ARC decision?***

#### Answer 1

If a student with a disability presents with a doctor's note referencing the need for a waiver of the face mask requirement, an ARC meeting is not necessary. The school should immediately grant the waiver and begin implementation. Doctor's notes can be written by anyone on the student's medical team who is qualified to make that determination. For example, notes from a physician's assistant or nurse practitioner should be accepted.

Schools and ARCs already may have substantial information about the medical issues of children that may cause mask wearing to be problematic. In these cases, an ARC meeting should occur to discuss the information and determine the appropriateness of a face mask. If a waiver is approved by the ARC, it should be documented in the student's IEP and implemented immediately.

In both cases, the student's teachers should be notified of the waiver. There may be additional staff in the building who should also be notified about the waiver to prevent staff from requiring the student to wear a mask. Schools should consider ways to help students identify themselves as having an approved waiver. An example of how to do this includes giving a student a card he or she can carry and produce to staff members when asked to don a mask they are not required to wear.

#### Question 2

***What funding can be used to purchase personal protective equipment (PPE) for students with disabilities?***



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### Answer 2

Districts have the option of using a variety of funding sources to pay the cost of purchasing PPE. This may include state and local funds, the Elementary and Secondary School Emergency Relief (ESSER) funds available under the Coronavirus Aid, Relief, Economic Security (CARES) Act and, if necessary, funds available under Part B of the IDEA.

While it may be tempting to purchase PPE for students with disabilities using IDEA funds, it is important to remember that according to [34 CFR 300.202](#), IDEA funds are intended to supplement, not supplant state, local and other federal funds and may only be used to pay the excess costs of providing special education and related services to children with disabilities.

Since PPE is necessary to reopen schools and must be provided for all students in all programs, IDEA funds should not be used in most cases. IDEA funds should only be used to purchase PPE when there is a specific situation when a student needs *additional* or specialized PPE because of his or her disability.

An example of an allowable IDEA expense might include a special education student requiring assistance with toileting. In this case, the provider assisting the student uses a gown. Gowns are not provided to educate all students but are necessary for this student. In this case, IDEA funding may be used. Another example of an allowable expenditure could be purchasing clear face masks for use with students who use American Sign Language as their primary mode of communication.

It is important to note that districts also may use state and local or ESSER funds to purchase PPE used for students with disabilities, including those in the examples described above. CARES Act funding does not have the excess cost requirement included under Part B of the IDEA.

The OSEEL also advises local districts to review the IDEA's maintenance of effort (MOE) requirements. This is necessary to ensure the district continues to spend from local or state and local funds an amount necessary to meet the IDEA's MOE requirements. Because schools have not had in-person classes, it is highly likely that the amount of state and local funds spent to provide special education and related services (such as special transportation) to children with disabilities has been reduced from prior years. As a result, districts may want to consider using state and local funds to ensure the MOE requirement of the IDEA is met.

### Question 3

***If students with speech or language impairments are physically at school, can therapy be provided with safety measures in place?***



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### Answer 3

Yes. Districts may hold in-person speech therapy sessions as long as they follow safety expectations as outlined in the “[Guidance on Safety Expectations and Best Practices for Kentucky Schools \(K-12\)](#)”. If this is not possible, speech therapists should consider providing instruction to the student through a virtual platform.

### Question 4

***Are group therapy sessions allowed?***

### Answer 4

Yes. Group therapy may be provided as long as expectations outlined in the “[Guidance on Safety Expectations and Best Practices for Kentucky Schools \(K-12\)](#)” are followed.

### Question 5

***If a student is scheduled to receive therapy or special education services in a resource setting, how can this be safely delivered? What safety protocol should be in place?***

### Answer 5

Therapists and resource classroom teachers should follow the classroom safety expectations addressed in the “[Guidance on Safety Expectations and Best Practices for Kentucky Schools \(K-12\)](#).” It is important to consider sanitation expectations for these classrooms. One safety expectation noted in the guidance is for teachers and administrative staff to assist janitorial staff by routinely disinfecting frequently touched items in the classroom. This is especially important for resource settings in which multiple students may utilize the same desk, chair or other items at different times throughout the day.

Schools should consider the service needs of students when developing schedules and should consider ways to minimize multiple transitions throughout the school building for students and staff while continuing to follow students’ IEPs. IEPs should not be modified to change a student’s educational setting for reasons other than the needs of the student.

### Question 6

***Therapists will be in contact with a number of students across a school day. What safety protocols should be in place for someone who will be making multiple contacts with students in a number of classes to meet contact tracing guidelines?***



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### Answer 6

In this situation it is important for therapists to maintain accurate records of daily schedules and interactions with students in order to assist with contact tracing as needed. Therapists also should consider minimizing contacts when developing schedules. For example, if students' IEPs require therapy once per week but do not specify the specific day, therapists should carefully consider how to develop schedules to limit contacts from multiple classes and grade levels throughout the day. If the therapist provides services to several students from one classroom, the therapist may choose to schedule sessions with students from that classroom all in the same day. In this case if contact tracing was needed, the therapist was only exposed to students from one classroom within that school day.

While this is just an example and may not always be possible, it is important to consider ways to minimize contacts across multiple classrooms and grade levels and to develop schedules to address this as much as possible while still providing the appropriate services to students based on their IEPs.

### Question 7

***If a student participates in co-teaching for a portion of the day and resource for a portion of the day, should the student's program be altered to stay with the same group of students?***

### Answer 7

While efforts should be made to limit contacts throughout the day, it is important for school districts to remember their requirement to provide a FAPE to students with IEPs. The ARC is responsible for determining the appropriate placement decisions under least restrictive environment provisions as set forth in [707 KAR 1:350, Section 1](#). While the local school district should follow the appropriate safety expectations as outlined in the "[Guidance on Safety Expectations and Best Practices for Kentucky Schools \(K-12\)](#)," whether the student is spending a portion of his or her day in the co-teaching setting or the resource setting must be determined by the ARC and based on the needs of each student.

### Question 8

***Should ARCs develop a contingency plan?***

### Answer 8

During this unprecedented time, it may be impossible to predict when and if schools may need to close again to in-person instruction due to a COVID-19 outbreak. ARCs may choose to develop contingency plans to address students' needs during NTI.



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According to the U.S. Department of Education's "[Questions and Answers on Providing Services to Children with Disabilities During the Coronavirus Disease 2019 Outbreak](#)," ARCs may include distance learning plans in a student's IEP that could be implemented during a closure due to COVID-19. In this case the contingency plan may include information regarding the provision of special education and related services through an alternate location or through alternate means.

Developing a contingency plan provides an opportunity for staff and parents to clearly communicate the expectations for NTI and to document how special education and related services will be provided during these unique circumstances. Establishing a contingency plan early minimizes questions that may arise regarding how to implement a student's IEP if changes occur and schools quickly transition to NTI.

### Question 9

***How do we protect students with disabilities who come to school but are medically fragile?***

### Answer 9

Schools should consider how they can creatively develop schedules for medically fragile students to limit their contacts as much as possible. Schools should apply 6 feet of social distancing and wear appropriate PPE when working with the student. Schools also may obtain parental consent to speak with the student's medical team to gain knowledge on how to best accommodate the student's medical condition in the classroom.

### Question 10

***One of our students has a hearing impairment. Her IEP includes the use of a frequency modulation (FM) system. How can her teachers wear appropriate PPE while still allowing the student to access instruction?***

### Answer 10

In this case, it would be appropriate to accommodate the needs of the student. Teachers wearing cloth face masks may potentially muffle sound and negate the benefit of the FM system. Instead of a face mask, teachers using FM systems may wear reusable face shields that wrap around the sides of the wearer's face and extend below the chin. Reusable face shields should be cleaned and disinfected after each use. When the teacher is not using the FM system, he or she must wear a face mask.





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## Preschool Questions and Answers

### Question 1

*If a student turns 5 during the year, does this child have to wear a mask from that point forward?*

### Answer 1

No, guidance from the DPH states that only children enrolled in 1st grade and above are required to wear a face mask.

### Question 2

*Is 6 feet social distancing expected for preschool students since masks are not required?*

### Answer 2

Yes. Guidance from the DPH states if preschool children are not wearing masks, it will be critical that preschool programs are planning for social distancing within the classroom.

### Question 3

*Is there a waiver on the required minimum instructional time for preschool programs?*

### Answer 3

According to [704 KAR 3:410, Section 6](#), programs must provide students a minimum of two and one-half hours of instruction per day, not including a meal (breakfast or lunch) at least four days per week, or they may design a local program that meets the needs of the community. The program must provide direct services to children or families for at least the same amount of instructional days as the local school district. This regulation provides flexibility with instructional days when considering local school districts' reopening plans for preschool programs and therefore would not require a waiver.

### Question 4

*Are local school districts expected to assign playground equipment designated only for preschool students?*

### Answer 4

Playground equipment use and schedules will be determined by the local school district. The [CDC](#) writes, "Close communal use shared spaces such as dining halls and playgrounds with shared playground equipment if possible; otherwise, stagger use and clean and disinfect between use."



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### Question 5

*Are preschool teachers permitted to wear clear plastic face shields rather than face masks to allow students to see our expressions and our mouths when forming letters and sounds?*

### Answer 5

Face shields do not provide enough protection from the aerosols produced by the nose and mouth; therefore, shields were not included in the “[Guidance on Safety Expectations and Best Practices for Kentucky Schools \(K-12\)](#).”

However, Kentucky’s DPH has recently shared that clear face masks may be an appropriate option for those working with students who need to receive visual cues from adults.



# COVID-19 Considerations for Reopening Schools

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## Resources

[“Guidance on Safety Expectations and Best Practices for Kentucky Schools \(K-12\)”](#)

[Kentucky Administrative Regulations](#)

["Considerations for Reopening Schools: Pupil Transportation"](#)

[“Guidance for Special Transportation in Kentucky”](#)

[“COVID-19 Considerations for Reopening Schools: Facilities and Logistics”](#)

[CDC: “Considerations for Wearing Cloth Face Coverings”](#)

[CDC: “Guidance for Childcare Programs that Remain Open”](#)

[“Non-Regulatory Guidance on Flexibility and Waivers for Grantees and Program Participants Impacted by Federally Declared Disasters”](#)

[“Questions and Answers on Providing Services to Children with Disabilities During the Coronavirus Disease 2019 Outbreak”](#)

## Resources from the U.S. Department of Education

July 6, 2020

The Office of Special Education Programs (OSEP) provided a questions and answers document on the initial evaluation and assessment timelines under IDEA Part C.

[“Initial Evaluation and Assessment Timeline”](#)

June 30, 2020

OSEP provided a questions and answers document related to IDEA Part B Procedural Safeguards.

[“IDEA Part B Procedural Safeguards”](#)

June 30, 2020

OSEP provided a questions and answers document relating to IDEA Part C Procedural Safeguards.

[“IDEA Part C Procedural Safeguards”](#)

June 26, 2020

OSEP provided guidance in the form of questions and answers relating to flexibility on IDEA Part B Fiscal Requirements.

[“Flexibility on IDEA Part B Fiscal Requirements”](#)



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June 25, 2020

OSEP provide guidance in the form of questions and answers relating to IDEA Part B use of funds during the pandemic.

[“IDEA Part B Use of Funds”](#)

June 22, 2020

OSEP released guidance in the form of questions and answers as it relates to the IDEA Part B dispute resolution procedures.

[“IDEA Part B Dispute Resolution Procedures”](#)

June 22, 2020

OSEP released guidance in the form of questions and answers as it relates to IDEA Part C dispute resolution procedures.

[“IDEA Part C Dispute Resolution Procedures”](#)

May 14, 2020

The Rehabilitation Services Administration (RSA) within the Office of Special Education and Rehabilitative Services (OSERS) issued a questions and answers document responding to inquiries concerning the administration of the State Vocational Rehabilitation (VR) Services, American Indian Vocational Rehabilitation Services (AIVRS), and Randolph-Sheppard program as it relates to operations for individuals with disabilities during the Covid-19 pandemic.

[Questions and Answers Document](#)

April 28, 2020

The RSA issued a [questions and answers document](#) regarding the use of funds.

March 21, 2020

The Office for Civil Rights (OCR) and OSERS issued a supplemental fact sheet addressing the risk of Covid-19 in Pre-K through 12<sup>th</sup> grade while serving children with disabilities.

[“Supplemental Fact Sheet Addressing the Risks of COVID-19 in Preschool, Elementary and Secondary Schools While Serving Children with Disabilities”](#)

March 12, 2020

The United States Department of Education and OSERS, OSEP, and OCR provided a questions and answers document regarding providing services to children with disabilities during the coronavirus disease 2019 outbreak.

[“Questions and Answers on Providing Services to Children with Disabilities During the Coronavirus Disease 2019 Outbreak”](#)