



DISTRICT OF COLUMBIA

OFFICE OF THE STATE SUPERINTENDENT OF

**EDUCATION**

## **Guidance Related to Coronavirus (COVID-19): Individuals with Disabilities Education Act (IDEA), Part C Provision of Early Intervention Services (Strong Start)**

### **Background**

As part of the District's response to the coronavirus (COVID-19) outbreak in the United States, the Office of the State Superintendent of Education (OSSE) is offering this guidance document to accompany guidance issued by the U.S. Department of Education, Office of Special Education Programs (OSEP) on ensuring the provision Part C of early intervention services (EIS) to infants and toddlers with disabilities during the coronavirus (COVID-19) outbreak. OSEP's guidance document can be found [here](#).

### **Scope**

This document contains guidance specifically relating to the provision of IDEA Part C services by EIS providers under Part C of the federal IDEA. It describes which activities will still be administered to families and children, and how.

This document generally constitutes informal guidance and does not impose any additional requirements beyond those included in applicable federal and local law and regulations.

### **Date Issued and Effective Date**

This guidance was issued on March 14, 2020. It will take effect on Monday, March 16, 2020 and will remain in effect until March 31, 2020.

### **Part C<sup>1</sup> Policy Guidance**

As of the effective date of this guidance, March 16, 2020, the offices of the state lead agency (OSSE) and the early intervention service (EIS) provider (Strong Start, DC's Early Intervention Program (DC EIP)) are closed due to public health and safety concerns as a result of a coronavirus (COVID-19) outbreak in the area and will not be providing Part C services to infants and toddlers with disabilities and their families during this period of Monday, March 16, 2020 through Tuesday, March 31, 2020. No direct services shall be delivered to children and their families during this time. Contracted service providers shall cease the delivery of services to children and their families during this time.

On March 11, 2020, Mayor Bowser declared both a Public Health Emergency and a State of Emergency related to coronavirus (COVID-19) indicating that "the spread of COVID-19 is an imminent threat to the

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<sup>1</sup> In the District of Columbia, OSSE is both the state lead agency and DC's EIS provider through Strong Start.

health, safety, and welfare of District residents that requires emergency protective actions be undertaken by the District Government.<sup>2</sup>

Once the offices re-open, the service coordinator and the providers for each child must determine if the child's service needs have changed and determine whether the Individualized Family Service Plan (IFSP) team needs to meet to review the child's IFSP to determine whether any adjustments are needed.

### **Questions?**

Current families should contact their assigned service coordinator directly if they have questions relating to this guidance.

Providers and other stakeholders should contact Strong Start at [osse.dceip@dc.gov](mailto:osse.dceip@dc.gov).

## **FREQUENTLY ASKED QUESTIONS**

### **Are the community playgroups going to continue during this time?**

- No. Playgroups are canceled during this time.

### **Is the program going to process new referrals?**

- All referrals received on or before March 13 will be assigned to a service coordinator and the initial steps such as conducting a family interview will be allowed to be done over the phone. Assessments and evaluations to determine eligibility will not be conducted during this time.
- All referrals received between Saturday, March 14, 2020 and Tuesday, March 31, 2020 will be accepted and families will be contacted and notified that a service coordinator will be assigned once the Strong Start office reopens.

### **Will evaluations and assessments be conducted during this time?**

- No. Eligibility evaluations and assessments will not be conducted during this time.

### **If an evaluation was already conducted and the child is determined to be eligible for Part C services, can the Individualized Family Service Plan (IFSP) meeting still be conducted?**

- Yes, the initial or annual IFSP meeting will be allowed to be conducted over the phone provided that both the family and the evaluation team and/or service provider team can participate in line with the requirements for participation in 34 CFR § 303.343. The service coordinator must obtain the parent's verbal consent to begin services, document the consent and date obtained in the Strong Start Child and Family Data System. Parents can then sign and date the IFSP at the next face-to-face visit.
- For children already receiving services, six month and annual IFSP reviews can also be provided over the phone.

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<sup>2</sup>[https://mayor.dc.gov/sites/default/files/dc/sites/mayormb/release\\_content/attachments/MO.DeclarationofPublicEmergency03.11.20.pdf](https://mayor.dc.gov/sites/default/files/dc/sites/mayormb/release_content/attachments/MO.DeclarationofPublicEmergency03.11.20.pdf);  
[https://mayor.dc.gov/sites/default/files/dc/sites/mayormb/release\\_content/attachments/MO.DeclarationofPublicHealthEmergency03.11.20.pdf](https://mayor.dc.gov/sites/default/files/dc/sites/mayormb/release_content/attachments/MO.DeclarationofPublicHealthEmergency03.11.20.pdf)

**Can services be provided by early interventionists using telehealth practice?**

- Direct services are not permitted during this time and will not be reimbursed. OSSE and DCEIP are considering this option in the event the closure extends past Tuesday, March 31, 2020.

**Will contracted service providers be compensated during this time?**

No, unless they are evaluators and/or service providers who participate in initial, six-month, or annual reviews by phone.

**Can services that were not provided during this time be made-up?**

- Services not provided during this time may be made up beginning in April once the office reopens on Wednesday, April 1, 2020.
- Make-up sessions must follow the current make-up policy and will be reimbursed accordingly. While families are not entitled to make-up services, providers can elect to make up services as they see fit.<sup>3</sup>

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<sup>3</sup>[https://mayor.dc.gov/sites/default/files/dc/sites/mayoromb/release\\_content/attachments/MO.DeclarationofPublicEmergency03.11.20.pdf](https://mayor.dc.gov/sites/default/files/dc/sites/mayoromb/release_content/attachments/MO.DeclarationofPublicEmergency03.11.20.pdf) (Declaring COVID-19 a natural disaster under the Natural Disaster Consumer Protection Act of 1992);