

# Division of Early Intervention and Special Education Services | Bulletin # 20-05

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Date: Issued April 2020, Revised October 2020

# Navigating Secondary Transition Services for Students with Disabilities during COVID-19

#### Purpose

The MSDE, Division of Early Intervention and Special Education Services (DEI/SES) has created this Technical Assistance Bulletin (20-05) to provide guidance to local school systems (LSSs) and public agencies (PAs) to address secondary transition of the Individualized Education Program (IEP) in response to extended school closures during the COVID-19 pandemic. Maryland remains committed to the continuity of learning for students with disabilities as we develop, implement, and evaluate individualized secondary transition plans.

This document is a supplement to Technical Assistance Bulletin (TAB) #20-01, Serving Children with Disabilities under IDEA during School Closures due to the COVID-19 Pandemic and TAB #20-03, Providing Continuity of Learning to Students with Disabilities during COVID-19. Please refer to these TABs for additional information and guidance on the provision of special education services to students with disabilities during this unprecedented time.

#### **Legal Drivers**

The Individuals with Disabilities Education Act (IDEA) ensures that all children with disabilities have available to them a free appropriate public education (FAPE) that emphasizes special education and related services designed to meet their unique needs and prepare them for further education, employment and independent living (20 USC §1400 (d)(1)(A); 34 CFR §300.1(a)). The IDEA's focus on preparing students for the future is embodied in its requirements related to transition planning. Developing and implementing a meaningful secondary transition plan (Transition Plan) is required to ensure that students with Individualized Education Programs (IEPs) are prepared for life post-high school.

At the time of this publication, federal requirements and timelines under IDEA have not been waived, including secondary transition. For students ages 14 through 21, the IEP team remains responsible for the development, implementation, and evaluation of the secondary transition plan. Under COMAR 13A.05.01.09(A)(3)(a), the first IEP in effect after a student turns 14 years old must include:

- Age-appropriate transition assessments of the student's skills, preferences, and interests;
- Transition goals in the areas of post-secondary education, employment, and independent

living based on transition assessment information;

- The course of study that will support the student to reach those goals; and
- A statement of the coordinated set of transition activities that comprise the transition services including, if appropriate, a description of a public agency's responsibilities before the student leaves the secondary school setting.

For more information about the legal requirements related to transition planning, please see Technical Assistance Bulletin #18-04, *Secondary Transition*.

# Continuity of Learning for Secondary Aged Transition Students

To provide continuity of learning during the extended school closures in response to the COVID-19 pandemic, a student's IEP, including the secondary transition plan, may need to be amended. The student's amended individual secondary transition services/activities must be implemented to the greatest extent possible through a virtual and/or distance environment.

Student **self-advocacy** and **community partnerships** remain key elements to support the individual services/activities designed to prepare a student for post-school outcomes (i.e., college, career, community). Both student self-advocacy and community partnerships may need to be heightened during this unprecedented time through flexible and meaningful opportunities that may include virtual or online learning, remote instruction, and computer-based instruction.

# Process Considerations for Amending the Secondary Transition Component of an IEP

During COVID-19-related school closures, it may be necessary to make amendments to the secondary transition plan for each student with disabilities beginning at age 14 through age 21. Amendments to the secondary transition plan, in conjunction with any amendments made to the student's comprehensive IEP, may occur outside of the IEP Team process if a parent agrees and prior written notice is provided consistent with the September 28, 2020 OSEP Q&A<sup>1</sup>. To help support amending the secondary transition plan of a student's IEP, consider the following:

<sup>&</sup>lt;sup>1</sup> https://www2.ed.gov/policy/speced/guid/idea/memosdcltrs/qa-provision-of-services-idea-part-b-09-28-2020.pdf © 2020 Maryland State Department of Education. Produced under the guidance of Marcella E. Franczkowski, Assistant State Superintendent, Division of Early Intervention and Special Education Services. 2

# Step 1. Review Review the student's IEP, inlcuding Secondary Transition Goals and Services/Activities. Step 2: Develop Identify and document necessary amendments required to deliver Secondary Transition Services/Activities, including the course of study needed to reach Transition Goals through a distance learning environment. Step 3: Agreement Obtain parent agreement to the individualized amendment(s) to the Secondary Transition Plan as part of the comprehensive amended IEP process and provide prior written notice. Step 4: Implement Implement the Secondary Transition Services/Activities as defined in the amended IEP in a virtual and/or distance learning environment. Step 5: Evaluate Monitor the delivery of Secondary Transition Services/Activities and document implementation and progress.

#### **Step 1: Review**

Review the student's IEP, including Secondary Transition Goals and Services/Activities.

It is important to note that amending a Transition Plan **does not** require an IEP Team meeting. Participants in the amendment process should include the student, parent(s), community partner(s) implementing the current Transition Plan, and case manager, as appropriate.

The initial step requires a review of the current Transition Plan, including the student's postsecondary goals, transition services/activities, and their relation to and impact on the annual (academic, behavior, communication) goals and progress toward the transition goals. A determination must be made about whether the current Transition Plan can be implemented as written in a virtual and/or distance learning environment or needs to be amended. To make this decision, the student's needs and performance, instructional goals and objectives, and identified related services should be considered. A review of additional supports and accommodations is important, as well as consideration of the support services that were accessible by the student daily when he/she was in the school building and community.

#### Step 2: Develop

Identify and document necessary amendments required to deliver Secondary Transition Services/Activities, including the course of study needed to reach Transition Goals through a distance learning environment. Secondary transition services/activities are a part of the comprehensive IEP linked to the annual goals and objectives.

Shifting instruction and transition activities to a virtual or distance learning environment requires an assessment of resources (including utilization of staff), technology available to both the student and service provider, and whether the method of instruction to be used is accessible to the student, community partners, and teachers. The activities from the Transition Plan should continue to be a primary area of focus, even if how services are implemented, who is implementing the services, as

well as the methodologies used to meet the individual needs of students with disabilities are different.

In these unique circumstances, think about what can be done to meet the overarching purpose for the transition services/activities if not necessarily the specific activity or task to the greatest extent possible. As an LSS or PA balances health and safety concerns with educational services, it is important that IEP team staff are flexible and consider employing a variety of delivery options. Special educators should work collaboratively with general educators, parents, and students to identify transition services/activities while keeping in mind that the goal with all students is to develop skills they can use in the community, education, and workplace settings after graduation.

To develop the written Transition Plan amendments, as necessary, for each student's individualized distance and/or virtual learning plan, consider:

### Content

- Identify what the IEP team staff, parent, and student want to accomplish during the school closure. Consider their goals and services/activities and discuss how/what can be implemented in a virtual and/or distance learning environment.
- Consider annual goals, transition services/activities, and the context and implementation of the comprehensive instructional program.
- Define how specially designed instruction (SDI) will be achieved during school closure.
- Consider the Present Levels of Academic Achievement and Functional Performance (PLAAFP) and what that tells the team about how the student learns best.
- Consider how the student's accommodations and modifications impact implementation of transition activities in a virtual and/or distance learning environment.
- Amend the IEP, as appropriate, to address the student's current unique needs and changes for the Transition Plan.

#### Environment

- Review transition services/activities and discuss how they can be implemented in a virtual and/or distance learning environment or within the community with social distances.
- Identify supports (material, technology, information) the parent and student need and barriers to success in the new environment.

#### Collaborating with Parents

- Clarify and agree on the role of parent and special educator; be cautious not to place an unnecessary burden on parents.
- Determine if the parent needs parent training/consultation services added to the IEP to assist with implementation of the amended IEP.
- Work closely with parents to be aware student progress.
- Help parents identify barriers to learning at home, community, and any other concerns.
- Listen to students and parents--acknowledge their feedback and concerns.

### Agency Linkage

- Reach out to local adult agencies to determine if there are services that may be provided remotely if the student is already a client.
- Identify staff responsible for making sure that students who are exiting have been connected with appropriate agencies as identified in their Transition Plan.

#### Step 3: Agreement

Obtain parent agreement to the individualized amendment(s) to the Secondary Transition Plan and provide prior written notice as part of the comprehensive amended IEP process.

A positive parent/teacher/system partnership will provide the necessary flexibility to develop and support an amended Transition Plan. Before any proposed amendments can be implemented, the parent(s) must agree to the amended Transition Plan and be provided prior written notice, as well as the data to be collected to monitor progress (this process can take place remotely). If the parent(s) is not in agreement, an IEP Team meeting should be convened, if possible. The amended Transition Plan should be continually reviewed as circumstances change, both in terms of student progress and LSS/PA delivery method. Following the parent's agreement, the amendments to the Transition Plan should be shared with the appropriate teacher(s) and community partner(s) prior to implementation.

#### Step 4: Implement

Implement the Secondary Transition Services/Activities as defined in the amended IEP in a virtual and/or distance learning environment.

Keep in mind that transition services/activities occur throughout the IEP year and frequently all activities are not implemented at one time. Identify the services/activities that should be initiated during the current learning environment to facilitate the student's progress toward the postsecondary goals, and plan how each activity will be addressed during this time. A transition service/activity that cannot be completed during the current IEP year may be addressed in the student's next IEP Transition Plan, as appropriate. Documentation of progress must be evident for each service/activity and include a statement regarding why the activity was not initiated or completed during the current IEP year. For graduating seniors, it is critical to review all transition activities and identify how remaining activities can be addressed to the greatest extent possible during this unprecedented time.

*Maryland's Transition Continuum* (see <u>Secondary Transition Implementation Guide</u>) supports the implementation of meaningful participation in transition activities that impact positive outcomes for students with disabilities. Effective amended Transition Plans leverage and prioritize age-appropriate milestones and competencies.

#### Early Years (14-17)

Introductory/fundamental skill development in:

- technology (availability and use)
- transition assessments
- job/career exploration
- self-advocacy
- activities of daily living
- social skills
- annual goals that align with Postsecondary Goals
- developing study skills/work habits
- Maryland Transition Digital Portfolio as appropriate

Implementation Examples: Early Years (Ages 14-17)

**Celina** is an 8th grader with a transition activity written in her amended transition plan to prepare for future employment by using a name stamp as appropriate on classwork and other documents. The case manager scheduled and conducted a virtual meeting with the parents and student to scaffold the skills to do this activity using her learning packets. In addition, they discussed how the transition activity would be monitored by the parents and case manager. Celina's progress will be monitored through a data sheet to identify the number of times Celina uses her name stamp with verbal and visual prompts, using a predetermined time delay. The parent and case manager will discuss progress and share the data sheet electronically or through mail.

Jose is a 9th grader with a transition activity written in his amended transition plan to explore careers of interest and discuss his findings with his case manager. The case manager provided Jose and his family a resource sheet that provides step by step instructions on how to use  $O^*Net's My Next Move$  to explore careers of interest and an organizer to complete the activity. To monitor progress, a phone conference to review what Jose discovered about his career interests was scheduled for the end of April.

### Later Years (Ages 17-21)

Refinement/application skill development in:

- technology (availability and use)
- transition assessments
- employment skill development
- career immersion
- self-advocacy
- independent living skills development
- social skills
- annual goals that align with Postsecondary Goals
- practicing study skills/work habits
- complete additional task cards and make updates in the *Maryland Transition Digital Portfolio*, as appropriate

#### Implementation Examples: Later Years (Ages 17-21)

*George* is an 11th grader with a transition activity written in his amended transition plan to explore the different branches of military service. George was scheduled to meet with recruiters on Recruitment Day at his high school in mid-April. He was going to meet with the different recruiters to learn about the different career paths in each branch and find out if he would be able to receive further training in computer programming. Since Recruitment Day has been canceled, George's case manager made available resources for George to access to explore training opportunities in each branch. George will submit his findings to his case manager through the Maryland Transition Digital Portfolio. Additionally, George can take work on improving his ASVAB score by taking the practice test on the <u>Military.com</u> website.

**Sharonda** is a 12th grader with a transition activity written in her amended transition plan to tour the local college and meet with the college's Disability Services Support Center and the financial aid office. The activity was scheduled to take place in late April. Due to the closing of local college this activity cannot take place as initially planned. The overarching purpose of the activity is for the student to learn about college programs, the application process, the cost, and documentation needed for accommodations. The case manager developed an online scavenger hunt for Sharonda to explore college programs, resources and student services. The case manager made resources available to complete this activity in packet form. The following resources can be used in preparing for college and for completing virtual college tours.

#### Step 5: Evaluate

Monitor the delivery of Secondary Transition Services/Activities and document implementation and progress.

*IEP Transition Plans will continue to be monitored for compliance with final submissions due by June 30, 2020.* 

The evaluation process identifies progress monitoring toward the amended IEP, including secondary transition services/activities. Keeping the end in mind during this time of continuity of learning helps keep the student on their path towards post-school outcomes. All secondary transition services/activities must continue to be monitored and progress reported in alignment with IEP goal © 2020 Maryland State Department of Education. Produced under the guidance of Marcella E. Franczkowski, Assistant State Superintendent, Division of Early Intervention and Special Education Services. 7

progress reporting. The amended Transition Plan should be continually reviewed as circumstances change, both in terms of student progress and LSS/PA delivery method, especially if community partners provide services. Communication with the student and family is key for progress monitoring. Engage students and parents in a discussion about the transition activities that will be addressed during this period of extended school closure. Determine what you can do, identify staff/community partners/parents to deliver instruction and understand the data to be collected, and monitor for progress. Document all services/activities provided and keep lines of communication open with parents and other community partners during this time.

#### **Resources for Families and Educators**

The National Technical Assistance Center for Transition has compiled resources to be used by parents to support their student with complex support needs virtually and in collaboration with families and staff. Click on the inks below to find:

- <u>Virtual Tips- Focus on Supporting Students in Transition with Complex Support Needs</u>.
- <u>Strategies & Resources in Distance Learning for Individuals with Disabilities with Significant</u> <u>Needs</u>

Parents and families can find additional resources to explore careers of interest at the following websites:

- <u>Explore Work</u>: A series of web-based modules that align with the five required WIOA Pre-Employment Transition Services activities for use with students with disabilities.
- <u>The Job Center</u>: Self-discovery activities written for teens to learn about work and why it is important.
- <u>Instructional Resources</u>: Resources that focus on postsecondary education Preparation and academic skills:
- <u>Get Ready for College</u>: A free series of online lessons for teens with disabilities, each focusing on a different aspect in the college preparation, selection, and disability services process. These online lessons contain video presentations and resources that can be used to equip students and others with the knowledge and skills for the transition to postsecondary education. Topics include the differences between high school and college, postsecondary education and training, selecting a college best fit, getting accommodations in college, and what you can do now in high school to prepare for college.
- <u>College Score Card</u>: Research colleges and universities through the US Department of Education
- <u>Virtual Job Shadowing</u>: To better prepare students for the workforce with career assessments and robust career planning, this website provides resources for career exploration and planning.

Families can support their child in college searches through virtual college tours:

- <u>University of Maryland</u>
- <u>Coppin State</u>
- <u>University of Maryland Eastern Shore</u>
- Frostburg State University
- <u>Salisbury University</u>
- <u>Towson University</u>

### **Frequently Asked Questions**

# **Q.** Should all transition goals and services/activities be reviewed to support continuity of learning during the extended school closure in response to COVID-19?

**A.** Yes. Review all current secondary transition services/activities in planning for continuity of learning. Determinations should be made as to how secondary transition services/activities can continue to be implemented in a virtual and/or distance learning environment or amendments need to be made to the IEP to modify the services/activities. In these unique circumstances, think about what can be done to meet the overarching purpose for the transition activity, not necessarily the specific activity or task. For example, an in-person college tour could be replaced by a virtual campus tour. It is important to be flexible and consider employing a variety of delivery options in order to provide secondary transition services and activities to the greatest extent possible.

### Q. Should Transition Plans continue to be monitored and progress reported?

**A.** During this unprecedented time, transition activities continue to be monitored by a designated staff member and progress reported in alignment with IEP goal progress reporting to the greatest extent possible. Communication with the student and family is key for progress monitoring. Engage students and parents in a discussion about the transition services/activities that will be addressed during this period of extended school closure. Document all services/activities provided and communication with parents during this time.

For example, if a student has a transition activity that is not being implemented during this time, progress monitoring should be reported by indicating "Not Yet Initiated/Not Yet Completed" and document the reason in the discussion box.

# **Q.** What is your first consideration as you address instruction in the amended Transition Plan of the IEP?

**A.** As local school systems plan for continuity of learning, including secondary transition, they should consider the whole student (preferences, strengths, interests, and postsecondary goals) while reviewing and amending the secondary transition plan. There should be evidence of alignment or relationship between annual (academic/behavior/communication) goals in the IEP and the transition services/activities in the amended transition plan that will be implemented in a virtual and/or distance learning environment.

# Q. How should transition services/activities aligned to postsecondary goals be implemented remotely?

**A.** Consider the overarching purpose for the transition activity and how it supports progress toward achieving the postsecondary goal. Do not focus on the specific activity or task itself if it cannot be implemented remotely – be flexible. The broad skills the student needs to achieve the postsecondary goals are now the focus. Discuss with the student and family what is most important and what can be accomplished within a virtual and/or distance learning environment. Frequent communication with the student and their family will allow you to understand individual circumstances and problem-solve ways in which services/activities can be delivered in a virtual/distance environment.

### Q. How do we engage and coordinate adult agencies during this unprecedented time?

**A.** Consider identifying a liaison to facilitate agency coordination and engagement. Many medical, behavioral health, and other health-related agencies provide critical programs and related services to students with disabilities. The MSDE, DEI/SES encourages you to work with these agencies to take advantage of services that can be offered for those that elect to continue to provide services during school closures related to the COVID-19 pandemic.

# **Q.** How would the progress of transition services/activities be monitored for students without internet access?

**A.** Each LSS/PA has identified alternate ways for families without internet access to access learning materials through their *Continuity of Learning Plan*. Refer to the local *Continuity of Learning Plan* to find out how progress for all students is being monitored. Communicate with the parents and student to determine how the transition services/activities will be monitored at home and how progress will be shared (over phone, by email, etc.). Be sure to document this communication with the parents (e.g., through a contact log).

# Q. What options are available for students who were engaged in Work Based Learning Experiences (WBLEs) or community programs (Ages 18-21) prior to school closure?

**A.** WBLEs and other community experiences are intended to give students an opportunity to link what they have learned in the classroom to real world experiences. To accomplish this during this extended time of school closure will require creativity. Some options for students may include:

- Engage in phone and email exchanges with host employers around the specific job or more generally about the industry;
- Participate in selected appropriate webinars being conducted by host sites;
- Watch video clips and/or listen to podcasts about the industry related to the WBLE;
- Record video clips explaining what they were learning on the WBLE or community experience;
- Develop a home-based project related to their area of interest, to share with others; and
- Engage in household activities that relate to a work experience (i.e. cooking, organizing, budgeting, minor maintenance/repair work, housekeeping, child care, elder care, etc.).

# Q. What rationale should be documented in the IEP Agency Linkage section when parental consent to refer/communicate or invite agency representatives is not known due to inaccessibility of records?

**A.** Agency Linkage remains an integral component of the secondary transition process. It is more critical now than ever to connect students to adult agencies such as the Division of Rehabilitation Services (DORS), Developmental Disabilities Administration (DDA), Behavioral Health Administration (BHA) and the Maryland Department of Labor. Flexible ways to facilitate the process include:

- Consistent due diligence to obtain parent consent with documentation of efforts;
- Strategic utilization of staff to obtain documentation; and
- Conversations with parents to verify written consent was provided.

• National Technical Assistance Center on Transition (NTACT) Resources During COVID 19 Outbreak

# https://transitionta.org/covid19

The NTACT has provided state and local education and service providers with a list of Transition resources that can be used during the C19 outbreak. This site also hosts "toolkits" of resources on a variety of topics, related to secondary education and services for students with disabilities.

Categories of resources include the following:

- o Transition Assessment and Planning Resources
- Transition Focused Instructional Resources
- Employment Preparation
- o Resources specifically focused on Students with Complex Support Needs

### • Pacer's National Parent Center on Transition and Employment

https://www.pacer.org/transition/learning-center/

Video and resources to support families and students in transition and the challenges of facilitating the movement to post-school environments, including independent living. Additional virtual resources aimed at exposure to traditional areas of secondary transition service delivery in employment, postsecondary education, community settings and self-advocacy.

#### National Collaborative on Workforce and Disability for Youth http://www.ncwd-youth.info/

Resources to support families of youth, professional supporting youth, and youth pursuing employment and career exploration (Career Development, Workforce Development, Youth Development and Leadership, and Self-Advocacy) are collected and available in various formats. A variety of modes of delivery ranging from podcasts to self-paced webinars are available at no cost while promoting full access to high quality workforce development services for youth.

# National Alliance on Mental Illness (NAMI) https://www.nami.org/getattachment/About-NAMI/NAMI-News/2020/NAMI-Updates-onthe-Coronavirus/COVID-19-Updated-Guide-1.pdf

*This website provides resources and information gathered in response to COVID-19 for individuals with Mental Illness.* 

For more information, call 410-767-0249 MARYLAND STATE DEPARTMENT OF EDUCATION Division of Early Intervention and Special Education Services 200 West Baltimore Street Baltimore, MD 21201

> Karen B. Salmon, Ph.D. State Superintendent of Schools

> > Clarence C. Crawford President State Board of Education

Carol A. Williamson, Ed.D. Deputy State Superintendent for Teaching and Learning

Marcella E. Franczkowski, M.S. Assistant State Superintendent Division of Early Intervention and Special Education Services

> Larry Hogan Governor

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