



ILLINOIS SCHOOL PSYCHOLOGISTS ASSOCIATION

Chief Education Officer, Dr. Ernesto Matias
Director, Barbara Moore
Illinois State Board of Education
Office of Special Education
Department of Education

April 15, 2020

RE: Special Education Evaluations and Services

I am writing on behalf of the Illinois School Psychologists Association and school psychology practitioners across the state in response to the ISBE Special Education Guidance dated March 18, 2020. We strongly discourage the continuation of evaluations during this turbulent time of crisis. With the mandatory suspension of in-person instruction through April 30, 2020, and the possibility of remote learning extending beyond this date, we urge the state board to revisit its guidance to provide additional clarity with respect to completing special education evaluations, timelines for evaluations to be completed, as well as the use of tele-formats for assessments.

As we are making adjustments to our comprehensive scope of service delivery, the COVID-19 pandemic presents unique challenges in regard to ethical assessment and decision-making practices:

- Some direct services to students can be provided through virtual means; however, direct observation and assessment cannot be administered through means other than face-to-face. A full and individual evaluation, initial or reevaluation, requires direct classroom-based observation of the student in the child's learning environment to document the child's academic performance and behavior in areas of difficulty (34 C.F.R. §300.310(a)). Direct observation of a student is required by statute for evaluations when a Specific Learning Disability is being considered.
- Federal guidelines, and therefore state guidelines, require that assessments and other evaluation materials used to assess a child are used for the purposes for which the assessments or measures have been determined to yield valid and reliable data, administered by trained and knowledgeable personnel, and are administered in accordance with any instructions provided by the producer of the assessment (34 C.F.R. §300.304(c)(1)).
- The standardized tests used (i.e. IQ tests, formal achievement tests) as part of evaluations are not designed to be administered electronically outside of a school setting during a pandemic crisis. In short, the administration of tests *must* be given through the means in which they were standardized. Deviations from standardization must be reported and, at times, can invalidate test results, which could potentially impact eligibility determinations.
- If evaluations are to be conducted remotely, they should be conducted through platforms specifically designed for that purpose. At this time, such delivery would also require training

beyond the evaluator, but also include training for the student and adult facilitator (likely parent/caregiver) who is assisting the student at home. It is unlikely the appropriate supports can be developed in time to be implemented during the current school year.

- Tele-format assessments and electronic communications between school personnel, students, and families present a myriad of concerns including lack of access to reliable technology and uncertain security for online meeting platforms. Of greatest concern is that confidentiality for the student cannot be ensured in a tele-format setting.
- Rating scale assessments completed by teachers and parents cannot replace direct face-to-face assessment or observation of a student in a school setting. Rating scale assessments are intended to be used as a complement to other assessment and interview tools as part of a comprehensive evaluation. Additionally, most ratings are intended to be based on describing the student's current or very recent educational and developmental functioning for the purposes of planning school-based interventions. Ratings collected while the student has not been attending school for more than one month and while experiencing uncommon personal or family stress cannot be assumed to be useful for educational decision-making.
- Finally, these unique circumstances pose validity issues which must be addressed when assessments are taking place in a time of anxiety for youth, their families and caregivers, and school personnel. The likelihood of making inappropriate eligibility determinations based on invalid assessment data is high. With consideration for these serious factors, we ask the state board to revisit its guidance regarding evaluation timelines and conducting assessments during this extended time of remote learning.

Our primary goal as school psychologists is to consider the best interests of the students and families we serve, while not abandoning their social, emotional, academic, and mental health needs. We have an ethical responsibility to maintain the highest standard for professional practices in educational and psychological assessment. We look forward to any opportunity to partner with state board colleagues to create appropriate guidelines for ethical professional practice in special education evaluation and service delivery to students across Illinois.

Respectfully,



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