Nationally, there is grave concern regarding the impact of the international health crisis on students. In particular, some of our most vulnerable youth and their families - often youth who are already disproportionately identified for special education services or who are disproportionately disciplined - have been placed in an additionally vulnerable position due to the move to distance learning related to COVID-19. In addition, these youth are also impacted by the concomitant issues related to special education assessment, eligibility, and supports during the pandemic.

A recent national survey found that parents from low-income and economically marginalized (LIEM) homes were 10 times more likely (38% vs. 3.7%) to say their students did little to no remote learning during this time. These youth were 3 times more likely not to have had consistent access to a device (32% vs. 10%) and 5 times more likely to go to a school not offering distance learning materials or activities at all (11% vs. 2%). Youth from LIEM homes were 2 times more likely to say their remote learning experience was poor or very poor (36% vs. 18%) and more likely to say the work felt like busy work (35% vs. 19%). When considering youth identified as needing special education services or students with Individualized Educational Plans (IEPs), only 20% of parents reported that their students were receiving services, with approximately 39% saying their child did not receive any support at all. Parents reported that these youth were twice as likely as peers to be doing little to no remote learning (35% vs. 17%), to report the distance learning experience was poor (40% vs. 19%), as well as reporting a greater concern about their children’s mental health (40% vs. 23%).

Prior to the COVID-19 crisis, youth in Florida were already having very different experiences in school. Currently, Black youth in Florida are more than twice as likely to be identified as having an intellectual disability or an emotional behavior disability relative to White peers. They are also more at risk for being identified as having a specific learning disability. Students with disabilities and Black youth are also at increased risk for receiving harmful, exclusionary discipline practices. Black students, in particular, are more than twice as likely to be suspended from school in Florida for more than 10 days. Additionally, Black students are 3.5 times less likely and Hispanic students 1.5 times less likely to be identified as gifted. There is great concern that identification practices that led to this disproportionality will be exacerbated as educators return to school under pressure to shore the gaps in instruction in the wake of the pandemic.

Throughout this crisis, there have been many discussions about whether students should continue to be evaluated during the pandemic for special education consideration. The Florida Association of School Psychologists (FASP) previously wrote a Call to Action: Evaluations, Eligibility, and Timelines to help schools better understand the concerns with remote assessment, most especially concerns about the lack of validity data supporting the use of these tests through electronic delivery. FASP has created this current document to help school psychologists and problem-solving teams guide psychoeducational assessment decision-making for when school returns to face-to-face instruction.

- The first and most important consideration is: What is best for the child?
  - Intentionally take an inventory of the child and family’s experiences since the pandemic. Try to understand how the child and family have processed these experiences. Will the child be able to give their best performance given these experiences and their current emotional state?

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Because of the critical importance of the social and emotional needs of students during this enormously stressful time, comprehensive evaluation of the social-emotional functioning of vulnerable students and recommendations for meeting their needs are critical. It is recommended that the child’s socioemotional needs have been assessed for and met prior to beginning the evaluation process.

- Please see the FASP Re-Entry Plan: Mental Health Service Delivery Guidelines for Educators for more information.

- Is the caregiver or adult student comfortable proceeding with an evaluation during this time once the limitations and risks have been carefully explained?

- Has the child reasonably re-acclimated to school-based learning formats?
  - This may be critical in reliably ruling out instruction disruption during the pandemic as the primary precipitating factor. For students who have a longer history of academic, social emotional, or cognitive difficulties, assessment should not be withheld but should take into consideration the potential exponential impact of pandemic recession and/or trauma. A thorough review of educational history is important.

- Have multiple assessments from multiple sources been used to assess academic needs and have corresponding appropriate intensities of interventions across all tiers of support (Tier I, Tier II, & Tier III) been implemented with fidelity?

- Has the student been provided access to grade-level standards and instruction through Universal Design for Learning principles, such that students were provided multiple means of representation to learn content and ensured multiple opportunities to act upon and to express their learning in an engaging environment?

- Are evidence-based class-wide interventions being used to shore the gap in instructional access that was created for all children because of the pandemic?

- For eligibility consideration, lack of appropriate instruction in reading and mathematics must be ruled out to determine eligibility. In this instance, there is clear evidence that instruction has been compromised. Is the nature of the contact the student had with a teacher during this time known? What did instruction look like? Was it intensive enough to determine if appropriate instruction was provided?
  - The student should be exposed to an ample amount of class-wide interventions (pre- and/or post-return to formal schooling) before deciding on the nature of response, ensuring that comparative data with peers are considered.

- Does the team have means to access all the data needed to complete the evaluation?

- In accordance with Rule 6A-6.0331, F.A.C., school districts are required to conduct a “full and individual evaluation” and that all evaluations are to be “sufficiently comprehensive” to identify all of the student’s special education and related ESE needs. Furthermore, districts must not rely on a single measure of assessment and must use technically sound instruments. In accordance with the rules, school psychologists have a professional responsibility to determine if the evaluation instruments they are using are appropriate during this time. For each instrument given, consider if it is appropriate for use during the pandemic given the high stakes decisions that will be made with the information.

- In general, for any assessment tools (e.g., behavior rating scales, academic testing, cognitive testing, etc.) that are used as components of the evaluation, ask the following:
Is the selected instrument appropriate considering language abilities and cultural background?

Are the norms being used to make comparisons still valid given likely instructional gaps?

Does it make sense to use wider confidence intervals given the current circumstances (e.g., stress in transitioning back into the school routine, housing or economic difficulties the family may still be facing, etc.)?

Also, are the tools being used appropriately and according to the APA Standards for Educational and Psychological Testing AND in keeping with the test publisher manualized instructions and guidelines for interpretation? If not, the extent to which modifications have been made and anticipated effects of those modifications must be noted.

In addition to these considerations, it is critical that CDC guidelines, including wearing masks and sanitizing all materials between use, be strictly followed for the protection of the practitioner and the child. Given that children and practitioners will need to wear masks, special consideration should be made as to whether the child was able to accurately hear the examiner and vice versa.

**Rating Scales:** The completion of rating scales, typically completed by parents/guardians and teachers, are required for several disability categories, namely Intellectual Disabilities (InD), Emotional/Behavioral Disabilities (E/BD), and Autism Spectrum Disorder (ASD).

- School psychologists and eligibility teams must consider the fact that many students referred for an evaluation due to a suspected disability in these categories have not been directly observed by their teachers from the prior school year for numerous months. Hence, the information gleaned from these rating scales is likely not appropriate for use in eligibility determination.
- Similarly, for students being rated by their teachers during the 2020-21 school year, it must be ensured that the minimum time for teachers to have observed the student meets the test publishers’ requirements for validity in order for the use of the instrument in educational decision making.
- In addition, the impact of the pandemic on the student’s behavior and functioning must be considered in the interpretation of the scores yielded on the rating scales.

**Academic Assessments:** Many Florida districts require the administration of an individually-administered, standardized test of achievement within their Exceptional Student Education (ESE) Policies and Procedures (SP&P) when considering eligibility for Specific Learning Disabilities (SLD). In addition, administration of a test of achievement is a required component for Autism Spectrum Disorder (ASD) and Intellectual Disabilities (InD).

- It is important for school psychologists and eligibility teams to recognize that these normed instruments typically provide comparative data for similar aged peers who were used in the norming group during a very different time educationally (i.e., sans global pandemic, when students received instruction regularly).
- In addition to the issue with norming, many students have not had access to the level of instruction that they were receiving prior to brick and mortar school closures. As a result, eligibility decisions made during this time based in part on standardized academic/achievement instruments should be made with extreme caution.

**Cognitive Assessments:** Of the 13 disability categories under IDEA, an assessment of IQ is required for eligibility determination for Intellectual Disabilities (InD) and Autism Spectrum Disorder (ASD). However, according to federal law, an individual test of intelligence (IQ) test is not a required component for eligibility determination for all exceptionality areas under the Individuals with Disabilities Education Act 2004 (IDEA 2004) and State Board Rules. School psychologists are urged to use professional judgement to determine if an IQ measure should be administered in instances in which IQ is not required for eligibility.
○ If IQ tests or other measures of cognitive assessment are administered, are instruments being utilized that account for the student’s background and accurately capture the student’s best performance?
  ■ Consider limitations of these types of assessments when administered to vulnerable populations such as youth from minoritized and historically marginalized groups who have been most negatively impacted by the physical, social, and economic impacts of COVID-19.
  ■ If previous existing data are available, be sure to compare current data collected during the period of the pandemic to any available prior data to ensure that the data are consistent (i.e., performance has not possibly been impacted by the international health crisis).
○ These considerations along with those outlined in the general considerations described previously should be reviewed carefully before deciding to conduct an assessment for gifted eligibility. As with all evaluations, when interpreting results, it is important to compare outcomes to screening data or other academic evidence to determine if the test results align with the student’s presumed ability prior to the pandemic.

- Finally, consider if the individual and collective assessment components and information generated will be useful. In addition to eligibility considerations, will the psychoeducational report be helpful in offering intensive interventions and support to help the student? The academic and social-emotional needs of students will be well-served during this pandemic with evidenced-based interventions and supports provided by school psychologists (directly and indirectly) to help meet the varied needs of students, regardless of the setting within which students are being instructed.

Resources:
- Florida Problem Solving Response to Intervention Project. (2020). Evaluation and Eligibility in Distance Learning: Guidance from BEESS.
- National Association of School Psychologists. (2020). Considerations for academic assessments and interventions upon a return to school [handout].