

FAQ DESE's COVID-19 Webinar for School Administrators (March 13)

DESE information and updates pertaining to COVID-19 continue to be posted to <https://dese.mo.gov/COVID19>. [Administrative Memo COM-20-001](#), sent to administrators after the March 13 webinar, answers many of the questions DESE leaders continue to receive. See below for more detailed information for school leaders to consider.

CALENDAR

In the event a school closure puts a district below the required 1,044 hours, will LEAs be required to make up days/hours? What criteria will be used in making a waiver determination?

LEAs can choose to submit a waiver to the Commissioner of Education upon their return to school, requesting forgiveness for the days missed due to COVID-19. Per state statute, commissioner has the authority to forgive the hours. To streamline this process, DESE will soon send LEAs an online form to collect the necessary waiver information.

VIRTUAL EDUCATION

Does a school district have to have a DESE-approved alternative education program before implementing it in case of a school closure?

DESE strongly encourages supporting student learning during any extended closure. Since hours can be forgiven and will not harm a school for accountability purposes, we encourage schools to focus on what will best benefit students rather than "attendance credit." DESE will not require an approved plan for alternative instruction during a period of closure related to COVID-19.

If we cancel school and choose to utilize virtual learning, how will missed days be counted against us? (Make-up, forgiveness, etc.?) What would be required to track and claim attendance for students doing virtual learning? Can we count attendance hours as remediation? Can a school submit a waiver for attendance hours with or without AMI?

If a school implements virtual learning, DESE will not require a plan or a waiver to be submitted. A school that implements virtual instruction may still ask for the days to be forgiven. Since hours can be forgiven and will not harm a school for accountability purposes, we encourage schools to focus on what will best benefit students rather than "attendance credit." Virtual learning hours should not be counted for remediation.

We are a rural district and some areas do not have internet service, so online is not an option for reaching all students. Is sending paper packets an option for AMI? What do we do for the kids who don't have internet at home?

DESE encourages supporting student learning during any extended closure. Since attendance hours can be forgiven and will not count against a school for accountability purposes, schools should focus on whatever alternative methods of instruction best support students. Schools have the flexibility to use virtual or traditional instruction, or a combination of those methods.

SPECIAL EDUCATION

How do we ensure Special Education students receive services during COVID-19 closures?

The Office of Special Education sent guidance to districts on March 13 based on short-term closure. That information includes:

- If during the time schools are out of session the general student population is not provided services, then services for students with disabilities would not be expected either. Individualized education program (IEP) services are expected to begin once school resumes.
- If an LEA continues to provide educational opportunities to the general student population during a school closure, the LEA must ensure that students with disabilities have equal access to the same opportunities, including the provision of a Free Appropriate Public Education (FAPE). To the extent possible, each student with a disability should be provided the special education and related services identified in the student's IEP.

Long term strategies and contingency plans continue to be discussed with the federal government.

What are the requirements for meeting IDEA, SPED and 504 compliance in a virtual emergency learning space?

Districts intending to provide IEP related services using alternative means (including virtual learning) are expected to adequately address the IEP goals. If possible, districts should include the services provided under a contingency plan. If that is not possible, districts would need to reconvene the IEP team once school is back in regular session and make a determination what, if any, compensatory services are required.

What happens with evaluation and IEP timelines if school were to close or move to virtual learning? Is there a certain length of closure that would trigger ESY services or other FAPE services for students?

The Office of Special Education Programs (OSEP) guidance did not include any allowances for pausing or extending timelines. Districts are advised to maintain the timelines as provided under the Part B State Plan for Review of Existing Data (RED) and evaluations which states: "Delays beyond this time may be permitted for just cause (school breaks for summer or holidays, student illness, etc.) and documented in the student's record." There is no existing authority to extend IEP timelines. OSEP guidance tends to assume districts will resume school within a short timeframe. There is no automatic trigger for ESY or FAPE. At present, those continue to be IEP team decisions.

If health department officials close schools, does that trump the Special Education service provisions?

Closing schools requires that students not physically attend. There are still opportunities for schools to provide meaning education and supports if they are set up to do that. At present, states have no authority to go beyond the guidance released by the OSEP and what is permitted in the Part State Plan.

ADA/FINANCE

If a district has low attendance because parents choose to not send students to school, am I correct that the first or second preceding year is the only way low ADA will be addressed? Or an estimation?

Yes. There is nothing in law that helps with low attendance that causes an estimation to fall below the first or second preceding year.

If we choose to close or if told to close, then lost hours due to closure doesn't affect ADA correct?

If you choose to close and receive a waiver from the Commissioner, then yes, that is correct. This would also be the case in the event of a forced closure.

ADA/FINANCE, CONT'D.

Would you please clarify the low-attendance days, and what type of documentation will we need for a parent keeping the student home for COVID-19? Will we need to submit some type of documentation for COVID-19 absences versus a normal absence?

Student absences related to COVID-19 would be coded/entered the same as any other illness-related absence.

FOOD & NUTRITION SERVICES

If we were to close and then choose to provide meals for our students, is there any possibility for those miles to be reimbursable miles if we do distribution by buses?

DESE has received questions regarding the emergency use of school buses in current COVID-19 situation, specifically using school buses to deliver food to students and or equipping school buses with Wi-Fi to provide internet services to students near their homes. This is allowable. This allowance would fall under the district's emergency preparedness plan as stated in [160.480, RSMo](#). For district reporting purposes, the cost will be reported as allowable transportation cost and the miles reported as ineligible, non-route miles.

What students can receive free meals during a school closure?

See the new [DESE Food and Nutrition Services memo](#), released Monday, March 16, 2020.

TRANSPORTATION

How will transportation funding be impacted by a short or long term school closure?

As districts spend less for transportation, state transportation aid will decrease since the district's expenses eligible for reimbursement will be reduced.

ANNUAL PERFORMANCE REPORT

Can you repeat the part about points total and attendance not counting against?

If an LEA requests that APR points be calculated, attendance will be excluded if it harms the overall score.

ASSESSMENT (Updated on March 24)

Due to school closures as a result of the coronavirus (COVID-19), DESE submitted a request to the U.S. Department of Elementary and Secondary Education (USED) to waive certain requirements in section 1111 of the Elementary and Secondary Education Act of 1965 (ESEA), as amended related to assessment and accountability requirements.

This waiver will allow Missouri to:

- Waive assessments required under the Every Students Succeeds Act (Missouri will also waive the state required social studies assessment).
- Waive the identification of comprehensive and targeted schools.
- Waive the requirements to report ESSA required items on the State, local education agency (LEA) or building report cards.

On March 20, DESE received permission from the USED to implement the waiver while they process the formal approval. As a condition of formal approval, DESE will provide the public and all LEAs in the state the opportunity to comment on this request. To comment on this [waiver request](#), please email DESE.ESSA@dese.mo.gov before **5:00 p.m. on Monday, April 6.**

ASSESSMENT, CONT'D. (Updated on March 24)

On March 19, Commissioner of Education Margie Vandeven shared: "There is a time and a place for statewide required assessments and now is not the time. Effective immediately, Missouri will be cancelling statewide required assessments for this school year," said Missouri Commissioner of Education Margie Vandeven. "There will be details that need to be worked out for graduating A+ seniors who may still need to take an assessment. Information on the federal assessment waiver should come soon and we will apply. We will share information and updates as soon as they become available." See Commissioner Vandeven's [full video here](#) (via Facebook).

STUDENT/STAFF TRAVEL

What is DESE recommending for students traveling to events, such as scholar bowl, ag contests, etc.?

All cancellations for DESE-sponsored events are posted at <https://dese.mo.gov/COVID19>. Please refer to the guidance of your local health department or the CDC.

What about students returning from international travel after spring break?

Please refer to the guidance of your local health department or the CDC.

SUMMER SCHOOL

If closures affect summer school is there a possibility of using this year's summer school ADA?

There is nothing in statute to allow this.

What about the one day out before starting summer school and/or the reduction in possible dates for summer school (like reduced days)?

We have suspended this requirement.

Is there any limit on the number of Summer School ADA if a district chooses to close and then require summer school?

Summer school cannot be required.

Will the summer school application period be extended?

Yes, the summer school application deadline has been extended to June 1, 2020.

SUBSTITUTE TEACHERS

If we get into a situation where we are needing subs and need to call upon our retirees, can they sub more than 550 hours? Is there a waiver for that?

The 550 hour limit is imposed by PSRS, not DESE. If retirees go over that number they could jeopardize their retirement without some kind of prior approval from PSRS.

A+ SCHOLARSHIP

What about A+ Scholarship requirements for attendance?

The Department of Higher Education and Workforce Development will issue guidance soon. Questions should be referred to Leroy.wade@dhewd.mo.gov.