

**Questions and Answers based upon  
February 5 Initial Evaluation Timeline Webinar**

**Q1: *When are districts expected to implement the 45-school day timeline for initial evaluations?***

A1: Effective immediately, districts are required to track and monitor the state 45-school day timeline for all initial referrals. **Note:** your data submission for the Evaluation Timeline Collection will not change for the 2019-2020 school year. No new data fields will be added to the collection until 2020-2021. However, this year, the district will be required to verify whether or not each referral met the state 45 school day timeline for each record. To assist districts in accomplishing this verification, the CSDE will set the Evaluation Timeline database so that it requires a “Reason for Delay” to be reported for every record (hand-entered and uploaded). This will allow the district to report if the record for each student meets the 45-school day timeline by selecting Delay Reason #7 which will be reworded to say: “Met State 45-School Day Implementation Timeline”.

**Q2: *Why are districts no longer allowed to use the federal timeline?***

A2: OSEP directed the Bureau of Special Education to discontinue the reporting of federal timelines in our SPP/APR Indicator 11 initial evaluation timeline submission retroactive to the 2018-2019 data collection because CT has an established state initial evaluation timeline. The CSDE recoded the state’s Evaluation Timeline Collection data to assess the level of compliance with the state timeline.

The CSDE must also report all 2019-2020 school year data using the state timeline. Districts should immediately begin following and tracking compliance with the state timeline.

Beginning with the 2020-2021 school year, the CSDE will add additional data elements to the Evaluation Timeline Collection to support monitoring of the state initial evaluation timeline.

**Q3: *If a district exceeds the 45 school day timeline but is within the 60 calendar day federal timeline for this school year, would the district meet the initial timeline requirement?***

A3: No. The CSDE can no longer report federal timeline data.

**Q4: *How does the issue related to districts determining a student ineligible and the immediately re-referring the student directly connect with the discontinuation of the federal timeline?***

A4: These two issues are not directly related, however OSEP directed the Bureau of Special Education to discontinue the reporting of federal timelines in our SPP/APR initial evaluation timeline submission because CT has an established state initial evaluation timeline. OSEP also determined that the practice of determining a student ineligible and then immediately re-referring a student is inconsistent with the IDEA. Initial evaluations must be sufficiently comprehensive to identify all of the child's special education and related services needs.

**Q5: *What constitutes a "comprehensive" evaluation?***

A5: The IDEA requires that each district must conduct a full and individual initial evaluation, consistent with the evaluation procedures and requirements outlined in the IDEA, before the initial provision of special education and related services to a student with a disability. In conducting the evaluation, the district must use a variety of assessment tools and strategies to gather relevant functional, developmental, and academic information about the student, including information provided by the parent, in determining whether the student is a student with a disability and the content of the student's IEP. In conducting the evaluation, the district cannot use any single measure or assessment as the sole criterion for determining whether the student is a student with a disability and the content of the student's IEP. The district must ensure that the student is assessed in all areas related to the suspected disability, including, if appropriate, health, vision, hearing, social and emotional status, general intelligence, academic performance, communicative status, and motor abilities. The evaluation must be sufficiently comprehensive to identify all of the student's special education and related services needs, whether or not commonly linked to the disability category in which the child has been classified. (34 CFR § 300.301; 34 CFR § 300.304; 34 CFR § 300.305).

**Q6: *Are PPTs required to conduct psychological, educational, speech and language, occupational therapy, and physical therapy evaluations for every initial referral in order for the evaluation to be considered comprehensive?***

A6: No. Based on the data/information discussed at referral PPT meeting, the PPT must decide what appropriate assessments are needed.

**Q7: *What happens when an outside evaluation is recommended as part of initial evaluation and not received within 45 school days? Does the 45 school day apply when you have an outside evaluator completing assessments?***

A7: Yes. The 45-school day timeline applies to initial evaluations even if the PPT has recommended an independent evaluation as part of the initial evaluation. The district, however, should reference the seven allowable reasons for exceeding the timeline that may apply given the specific facts of that case.

**Q8: *There are times when at the initial referral PPT a comprehensive evaluation is designed to consider all areas of suspected disability, but through the course of the evaluation, additional information becomes available that causes the team to consider another disability. When the additional evaluations recommended cannot be completed within the 45 days how should this be addressed since a student can no longer be re-referred?***

A8: In this scenario, when the initial evaluation goes beyond the 45-school days, it would be considered “complete beyond the timeline.” However, if SLD is suspected, the district can ask the parent to extend the timeline using form ED637. The parent may agree to waive their right to 10 day PWN which may allow the IEP to be implemented sooner. This may allow the district to remain within the timeline.

**Q9: *How are initial evaluations that occurred in 2019-2020 prior to 1/23/2020 going to affect districts?***

A9: Districts will continue with the current process for reporting evaluation timelines data to the CSDE for the remainder of the 2019-20 school year. However, the CSDE is required to assess if all records met the state’s 45-school day timeline including those evaluations for which written parental consent was received from July 1, 2019 through the end of the school year. In order to accomplish this, the CSDE has spoken with all IEP vendors and will set the Evaluation Timeline database so that it requires a “Reason for Delay” to be reported for every record (hand-entered and uploaded). This will allow the district to report if the record for each student meets the 45-school day timeline using Delay Reason #7 that will be reworded as: “Met State 45-School Day Implementation Timeline.”

**Q10: *How did the state handle cases of immediate re-referral of students in the 2018-2019 data collection?***

A10: For all the students that had an immediate re-referral, the CSDE deleted the first of the two referrals from the base table. The CSDE kept the second initial referral that occurred for that student and recoded it to not on time, "Beyond the Timeline."

**Q11: *Is it expected that districts would only make one referral for an individual student per year?***

A11: Generally yes. However, if there is new information about the student that is made available to the PPT, the team may decide to refer the student again. This would be a second referral not an immediate re-referral after the first evaluation.

**Q12: *Is a student limited to only two referrals in a school year? 1 in fall and 1 in spring? How much time needs to pass between referrals?***

A12: There is no limitation to the amount of times that a student can be referred in a year. The example in the webinar was simply an example and there are no rules about the number of referrals that can happen in a year. OSEP, however, was clear that finding a student ineligible after completing an initial evaluation and then immediately re-referring that student is inconsistent with the IDEA.

**Q13: *What is the process for a referral submitted during the summer?***

A13: In the case of a referral made in between school years, the effective date of the referral may be deemed to be the first school day of the next school year.

**Q14: *For reporting purposes, where is the date of implementation documented on the current IEP document?***

A14: The "Start Date" on the Service Delivery Grid (page 11).

**Q15: *How do we document pauses in timeline? How do we set the process log tracking?***

A15: The district should track the pauses in the timeline internally within their systems. The IEP vendors should have the capability to track school days. IEP vendor systems also have process logs to document dates of referral, parent consent for initial evaluation, eligibility determination, parent consent for special education placement, and IEP implementation. Districts should contact their vendors to discuss these options.

**Q16: *Can you give some examples of when the timeline would be paused?***

A16: The timeline may be paused up to 10 school days from the point in time when a parent is given consent for the initial evaluation until the district receives the signed consent. The timeline may also be paused up to 10 school days from the point in time when a parent is given consent for the provision of special education until the district receives signed consent. Other examples of pauses in the timeline include: weather related cancellations (snow days) professional development days when school is not in session, and vacation days. There may be other examples as well but a school day is defined by the district's school year calendar.

**Q17: *If the eligibility PPT needs to be rescheduled due to weather related closings that interfere with access to evaluate the student and the calendar is booked due to multiple reschedulings, is it allowable to extend the timeline, and if so, under which allowable reason?***

A17: Yes. An allowable reason for exceeding the 45-school day timeline is Reason #5: "Eligibility Determination PPT cancelled due to inclement weather/emergency closing."

**Q18: *What if a parent returns consent for (initial evaluation) testing after 10 days?***

A18: If the district does not receive parental consent after 10 days, it is considered a refusal of consent per state regulations and the referral would not be reported in the Evaluation Timeline Collection. However, in an effort to work with the parent, the district could accept the late consent and move forward with the initial evaluation. The timeline would remain paused for the entire length of time from consent requested to consent received.

**Q19: *What happens if the parent does not return the consent form to conduct an initial evaluation?***

A19: The 45 school day timeline would stop. The district may not conduct an initial evaluation until consent is received or the district may request a due process hearing. **Note:** Referrals without consent to conduct the initial evaluation are not reported in the Evaluation Timeline Collection.

**Q20: *What if there is a request by a parent to reschedule or delay a PPT2 meeting therefore exceeding the 45-day timeline?***

A20: This is an acceptable reason for going beyond the timeline. If you have scheduled an eligibility determination PPT meeting at a mutually agreeable time with the parent and then the parent requests to reschedule the PPT meeting, the district should document the parent's request and reschedule the eligibility determination PPT meeting for another mutually agreeable time and date. In this case, you would meet acceptable Reason for Delay #1: "Documented request by parent to reschedule or delay the eligibility determination PPT meeting after agreeing to attend at a particular time and date."

**Q21: *Will the "Allowable Reasons for Delay" in the 45 school day timeline be available within my IEP vendor system?***

A21: Yes. The allowable reasons for delay are already in your vendor system.

**Q22: *Will districts be in compliance if one of the allowable excuses is used?***

A22: Yes. However, any time Reason #8 "Other" is used, the record will be counted as late.

**Q23: *When the parent/guardian signs consent for an evaluation at the PPT meeting, does the implementation date to begin the evaluation need to be delayed 5 days or 10 days or can the evaluation begin immediately?***

A23: If the consent for initial evaluation is signed, the evaluation may begin immediately.

**Q24: *Can you clarify the 60-school day initial evaluation timeline for students who are placed in an out-of-district placement?***

A24: Regulations of Connecticut State Agencies (RCSA) § 10-76d-13(a)(2) provides that when a referral is made during the academic year, and the student's IEP calls for an out-of-district or private placement, the IEP shall be implemented within 60 days of referral, exclusive of the time required to obtain parental consent.

Please note that currently, this is not listed as an allowable reason in the data collection. We will add that as an allowable reason for delay when we do the revisions for the 2020-2021 school year. But for now, the school district can choose the option of meeting the 45-school day timeline and we will accept that option for the current school year. It is recommended in this case, that districts keep an internal record of meeting the 60-school day timeline.

**Q25: *What is the rationale to only extend timeline for SLD, why not other disability categories?***

A25: This allowable reason is pursuant to our state special education regulations. Please see RCSA § 10-76d-9(b)(4).

**Q26: *There are three dates on the State's referral form (ED621) the date received, the date referred and the date with signature of the individual completing the form. Which date should districts be using for receipt of referral?***

A26: For the initial evaluation timeline, the referral date is the date the district receives the written referral. This should be recorded at the top right hand corner on the first page of the form "Date Received."

**Q27: *Will the State revise the initial referral form (ED 621)?***

A27: Yes. Our goal is to have a revised form available to districts for the start of the 2020-2021 school year.

**Q28: *Will we be able to submit additional questions to the CSDE and who should we address them too?***

A28: Please click on the document link below for contact information if you have further questions: <https://portal.ct.gov/-/media/SDE/Special-Education/Timeline-for-Initial-Evaluation-Memo.pdf?la=en>