



The Early Development Network Co-Leads are providing additional guidance regarding IFSP service provision and resumption of home visits since the COVID-19 Pandemic. Please contact the Co-leads with additional questions as they arise.

Given the lowered public health COVID-19 risk dial for regions and the State, the Co-leads strongly encourage all districts, PRT's and Services Coordination agencies to return to in-person service delivery. The EDN Co-leads must ensure local EDN programs are making timely and adequate service delivery decisions responsive to the current state of the COVID-19 situation in their region, which includes the following factors:

- return to in-person services/educational access within local school district classrooms for children ages 3-21;
- wide availability of the COVID-19 vaccine;
- lowered risk of transmission due to vaccine availability;
- length of time families/children have received virtual service delivery which can lead to regression in a child's abilities and family's knowledge and skills in adequately supporting their child's development;
- federal requirements of provision of virtual service delivery is only allowable in response to emergency public health/directed health measures due to the COVID-19 Pandemic.

Based upon these factors, the federal US Department of Education, Office of Special Education Programs, has issued guidance to States regarding the expectation of the return to in-person learning and EI service delivery. This guidance includes state and local programs responsibility to address "lost" service/instruction time for each child/family, as well as addressing and implementing actions to ensure equitable access to in-person EI service delivery for children and families.

For additional guidance on resumption of in-person service delivery, please review the June 2020 EDN Co-Lead guidance:

http://edn.ne.gov/cms/sites/default/files/u26/EDN%20COVID%20Guidance2_June%202020_Final.pdf

Please review and ensure compliance with the following regulatory requirements related to resumption of in-person service delivery:

- **March 2020 OSEP Q/A on Providing Services during the Coronavirus Disease 2019 Outbreak:** <http://edn.ne.gov/cms/sites/default/files/u26/qa-covid-19-03-12-2020.pdf>, Question B-2:
"Once services are fully resumed, the service coordinator and EIS providers *for each child must assess the child to determine if the child's service needs have changed and to determine whether the IFSP Team needs to meet to review the child's IFSP to identify whether changes to the IFSP are needed*". Additionally, IFSP teams will need to determine whether *compensatory services* are needed

to address lack of service provision or lack of effectiveness of virtual service delivery towards the child's developmental progress during the COVID-19 Pandemic.

➤ **December 2020 Additional Co-Lead Guidance regarding IFSP Meetings and Part C Service Provision (Prior Written Notice):**

http://edn.ne.gov/cms/sites/default/files/u26/EDN%20COVID%20Guidance_Dec.2020_Final.pdf:

“Once the IFSP team determines the IFSP services are able to once again be provided via face to face in the natural environment, then the district and the services coordinator must each provide another PWN to the parent(s) as soon as possible informing of the resumption of face-to-face service delivery in the natural environment for each service. Again, Form HHS-6, Notice of Action, can be used by the services coordinator to fulfill the PWN requirements for the service of services coordination.”

Also, please note that parental preference to continue virtual service delivery due to ease and convenience is not allowable due to federal requirements to provide EI services within natural environments. A family can only choose to utilize virtual service delivery during the COVID-19 Pandemic emergency status if the child's fragile/serious medical condition requires additional health protections. Once the COVID-19 Public Health Emergency in Nebraska has ended, EI services must return to in-person service provision for all children/families.