



FAQ Update 8-28-2020 Individualized Remote Learning Plan (IRLP)

This is a working document, which may be updated frequently due to the rapidly changing response to this pandemic emergency and ongoing Federal guidance updates.

The following recommendations acknowledge that IDEA-eligible students are entitled to FAPE and that students, families, and schools are having to adapt to novel circumstances due to the COVID-19 pandemic. There are no waivers provided for IDEA and time lines have not been extended.

Remember that all decisions made regarding a student in special education or on a 504 plan are individualized and child specific.

What is an Individualized Remote Learning Plan (IRLP)?

An IRLP is a temporary plan describing changes to a student's IEP that are necessary to protect health and safety during the pandemic and provide a free appropriate public education (FAPE). Although IRLPs are not contemplated or required by IDEA, the Maine DOE recommends that IEP teams consider such a plan to navigate the uncertainties related to COVID-19.

An IRLP may be developed with input from the student's IEP and must include parent input. It should be added to an Individualized Education Plan (IEP) as an accommodation. The team may choose to do this during an IEP team meeting or as an amendment to the IEP without a meeting. For an amendment without a meeting, you must document parent input into the plan.

There are two uses for the IRLP:

- 1) The IEP team may, but is not required to, create an IRLP plan for a student that could be implemented during disruptions to in-person instruction due to the pandemic. "Such contingent provisions may include the provision of special education and related services at an alternate location or the provision of online or virtual instruction, instructional telephone calls, and other curriculum-based instructional activities, and may identify which special education and related services, if any, could be provided at the child's home." [Questions and Answers on Providing Services to Children with Disabilities During the Coronavirus 2019 Outbreak \(OSEP 3/2020\).](#)
- 2) Additionally, the IEP team may, but is not required to, create and IRLP plan for a student that is being offered in person services, but parents or guardian elect to access services remotely. If a parent chooses an online program, due to potential health and safety concerns, and the exact type and amount of services identified in the IEP cannot reasonably be provided in that program and/or the IEP team believes that in-person instruction is necessary to provide FAPE, the IEP team should develop an IRLP to

describe the services that will be delivered in the online program. In addition, the school should provide parents with prior written notice to communicate the necessary changes in service delivery, the reason for the changes, and identify the services that are available should the parent choose in-person instruction. Although the determination of when prior written notice is required depends on the particular facts and circumstances, OSEP encourages schools to “ensure that parents are fully informed of how their child’s special education and related services needs are addressed during remote learning.” [Q & A on Implementation of the Individuals with Disabilities Education Act \(IDEA\) Part B Procedural Safeguards in the current COVID-19 Environment \(OSEP 6/30/20\)](#).