# Guide to IEP/504 Plans in Virtual Learning Environments

These resources provide guidance to ensure that the appropriate steps have been addressed to develop, circulate, and implement recommendations in IEP or 504 plans for students in virtual school programs. The steps lead you through a process and help address potential challenges. How to complete the self-assessment

For a quick overview of the basics and some of the challenges related to IEP/504 plans and virtual learning programs, read the CITES [IEP/504 Plans in Virtual Learning](https://cites.cast.org/binaries/content/assets/cites/resources/cites-vs-iep504-a11y.pdf) or [Accessible Educational Materials in the IEP](https://aem.cast.org/get-started/resources/2021/aem-in-the-iep) publications.

**Be in the Know: Before you ask any questions, be sure you and your team members understand the laws which guide the IEP and 504 processes.** [**Read what the law requires for IEP and 504 Plans.**](https://www2.ed.gov/parents/needs/speced/iepguide/index.html)

## Sample IEP Checklist

[This sample checklist](https://castudl.sharepoint.com/:b:/s/citesteam/EX6m3j824-hBh_KJCH75elUB3ECii2NUxaNRUzJA-UTVDw?e=JjrFe4), developed by [Mountain Heights Academy](https://mountainheightsacademy.org/) in Utah, helps educators review the IEP of a new student entering their virtual school. Once the IEP has been reviewed, this checklist helps educators understand what steps to take to amend the IEP.

## Steps and Considerations

* [Developing and Organizing the IEP/504 Plans](#_Developing_and_Organizing)
* [Developing and Writing the IEP/504 Plans](#_Developing_and_Writing)
* [IEP/504 Team Participant Worksheet](#_IEP/504_Team_Participant)
* [Supporting Recommendations for Accommodations](#_Supporting_Recommendations_for)
* [Supporting Family Participation](#_Supporting_Family_Participation)
* [Transitioning from a Virtual to a Blended or Full-time Face to Face](#_Transitioning_from_a)

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## Developing and Organizing the IEP/504 Plans

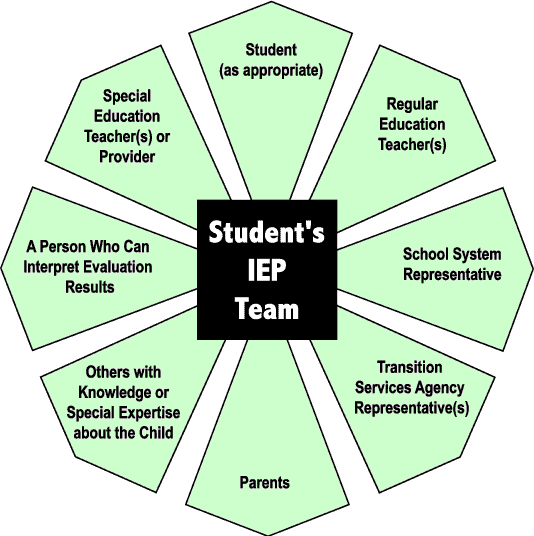
Create a process for organizing, disseminating, and notifying educators of a student's disability, accommodations, and AT requirements.

| **Questions to Ask** | **Considerations/Resources** | **District/School Plan** |
| --- | --- | --- |
| Does the program track which students have an IEP/504 plan? | Create a database (using your SIS) to identify students with plans. |  |
| Do educators have a copy of the IEP/504? | Require the IEP as part of the registration process.  If you don’t have a copy of the plan, contact the school of record and/or the family to get a copy.  Steps to consider to streamline the process. The example below, developed by the Wisconsin Virtual School, includes Step 1, a process to track that the IEP has been received. |  |
| What if a copy of the IEP/504 has not been received from the school of record. | For full-time virtual programs: Choose a specific wait time period (e.g., 30 days), and then inform the family that you still do not have a copy, and work to develop a new plan.  For supplemental programs: A supplemental site is not able to create a plan, nor can a plan be implemented without a copy. Continue to ask the school of record for the plan, and document all communication taken to procure the plan. Solicit support from the family,  Supplemental virtual programs must ensure that the school of record approves any requested accommodations. |  |
| What is the process for when the program encounters requirements and/or recommendations in an IEP/504 plan that the virtual program may not be able to provide in the same manner as in-person learning? | Convene the team, including the student (if appropriate) and family, to clarify the purpose and use of the accommodation in the former educational setting and what it can look like in the virtual setting.  Determine whether the accommodation is still needed given the new learning environment, and if yes, how it will be met.  A formal meeting may be necessary if changes to the IEP/504 plan are necessary. |  |
| Is there a clear communication system for informing educators about the accommodations students are to receive in the virtual setting? There are differences between preferential seating in the face-to-face classroom vs. the virtual classroom. | The example below\*, developed by the Wisconsin Virtual School, includes a process to ensure accommodations are identified and communicated to staff. |  |
| Do all staff members, including those who may be involved in developing accessible curriculum for the student (e.g., instructional designers, if different from the educators), have access to the plans? | As part of organizing the IEP/504 plans, list all staff who should have access to the plans, including:  Those responsible for developing accessible materials, such as instructional designers  Those who support and provide training for assistive technology devices  Therapists who may be affiliated with contractual organizations |  |

**\*** Example: [Collecting Accommodation and Modification Information for Students Enrolled in Online Learning](https://www.canva.com/design/DAFLF66XhQA/KXiHYZA6HzXM5J6f2Fizxg/view?utm_content=DAFLF66XhQA&utm_campaign=designshare&utm_medium=link&utm_source=publishsharelink#1): Developed by the [Wisconsin Virtual School](https://www.wisconsinvirtualschool.org/), this example outlines steps for developing a system to organize and disseminate information regarding accommodations and modifications included in IEP/504 plans for students who attend virtual schools.

## Developing and Writing the IEP/504 Plans

In most cases, the law is clear about who the [IEP/504 team members](https://www2.ed.gov/parents/needs/speced/iepguide/index.html#team) (Section 7, A Guide to the Individualized Education Program) should be, as well as who should participate in [writing an IEP/504 plan](https://www2.ed.gov/parents/needs/speced/iepguide/index.html#writing).



Although specifics related to various virtual learning environment models are not provided in these guidelines, the recommendation that a student’s team should include School System Representatives as well as Others with Knowledge or Special Expertise about the Child, suggests considerations should be addressed for different scenarios that exist in virtual learning environments.

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## IEP/504 Team Participant Worksheet

Based on the program you work with, ensure that the appropriate participants are involved in the IEP/504 process. Who should be involved in the IEP/504 process for students?

### Program Examples:

1. Full Time Virtual: Student is enrolled full time in a Virtual School with no connection to the school or district of record. **A-H below**
   1. Regular Education Teacher (if applicable) **All**
   2. Special Education Teacher **All**
   3. Educator to Interpret the Evaluation Results **All**
   4. School System Representative, such as the IEP Coordinator **All**
   5. Others with knowledge or special expertise about the child including ancillary therapists, such as physical, occupational, speech and Language therapists, or the guidance counselor **All**
   6. Transition Services Agency Representative(s) if applicable **All**
   7. Family **All**
   8. Student (if determined appropriate)
2. Full Time Virtual: Student is enrolled in a virtual school and receives recommended ancillary services, such as speech and language, PT, OT, or counseling support from an outside agency.

**A-H above**

**Plus**: Therapists providing services to the student should be included in the development and writing of the IEP plan.

1. Full Time Virtual with School of Record: Student is enrolled in a Virtual School, but School of Record is responsible for the IEP.

**A-H above**

**Plus**: Staff from the virtual school should be included in the development of the plan. For example, the educators(s) from the virtual school should be part of the IEP/504 team.

1. Supplemental Virtual Courses (part-time): School of record is responsible for their IEP/504 plan.

**A-H above**

**Plus**: Educators from the virtual school who are involved with the student should be an active part of the team and should be included in meetings and contribute to writing the IEP. This may include educators and instructional designers.

Find the description in the previous list that best matches your virtual program and determine who should be involved in the IEP/504 process for the students in your program.

**List team members and their roles:**

**Student**: **School**: **Grade Level**:

| **Role** | **Participation (yes/no)** | **Name** |
| --- | --- | --- |
| Regular Education Teacher (if applicable) |  |  |
| Special Education Teacher |  |  |
| Educator to Interpret the Evaluation Results |  |  |
| School System Representative, such as the IEP Coordinator |  |  |
| Others with knowledge or special expertise about the child including ancillary therapists, such as physical, occupational, speech and Language therapists, or the guidance counselor |  |  |
| Transition Services Agency Representative(s) if applicable |  |  |
| Family |  |  |
| Student (if determined appropriate) |  |  |
| Physical Therapist |  |  |
| Occupational Therapist |  |  |
| Speech and Language Therapist |  |  |
| Counselor |  |  |
| Staff from School of Record and Virtual School if responsibility is shared |  |  |
| Other |  |  |

## Implementing IEP/504 Plans

Implementation of IEP/504 plans often include recommendations for accommodations, assistive technology, and accessible educational materials (See the [Glossary](https://cites.cast.org/more/glossary) for definitions of each). It is often the case that recommendations differ depending upon whether the student is enrolled in a virtual learning environment or in a brick and mortar environment. For example, a common accommodation is preferential seating, which pertains to the brick and mortar classroom, but not necessarily the virtual classroom where students are typically attending class from their home.

If the IEP/504 plan is written by the brick and mortar school of record, some adjustments may be needed for application to the virtual classroom. The questions and resources below should help to ensure the best alignment of recommended accommodations, assistive technology, and accessible educational materials in a virtual learning environment.

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## Supporting Recommendations for Accommodations

| **Questions to Ask** | **Considerations/ Resources** | **Selected Solutions** | **District/School Plan** |
| --- | --- | --- | --- |
| What accommodations and modifications are available? (e.g., Do the tools provide students with text to speech and speech recognition if identified as accommodations?) | Generate a database which includes the software programs and apps you use and what accessibility features are built-in. (e.g., The LMS Canvas and Google Classroom both have built-in text to speech and display customization capabilities.)  Many software programs and apps post descriptions of their accessibility features online. Here are some examples to get started:  Embedded AT & Accessibility Features in Devices   * [Chrome OS](https://support.google.com/chromebook/answer/177893?hl=en) * [iPad OS](https://support.apple.com/guide/ipad/get-started-with-accessibility-features-ipad9a2465f9/ipados) * [iOS](https://www.apple.com/accessibility/) * [Windows 11](https://www.microsoft.com/en-us/windows/accessibility-features?r=1)   Learning Management Systems (LMS) and Accessibility   * [Canvas Accessibility](https://www.instructure.com/products/canvas/accessibility) * [Blackboard Accessibility](https://help.blackboard.com/Learn/Student/Ultra/Accessibility) * [Google Classroom Accessibility](https://edu.google.com/intl/ALL_us/why-google/accessibility/) * [Schoology Accessibility](https://docs.powerschool.com/SGYH/en/system-administrators/getting-started-for-sys-admins/section-508-compliance-vpat)   Other Programs:   * [Texthelp](https://www.texthelp.com/products/) * [Read & Write for Google](https://chrome.google.com/webstore/detail/readwrite-for-google-chro/inoeonmfapjbbkmdafoankkfajkcphgd?hl=en-US) * [Microsoft Office Accessibility Suite](https://www.microsoft.com/en-us/accessibility) | Many software programs and apps post descriptions of their accessibility features online. Here are some examples to get started:  Embedded AT & Accessibility Features in Devices   * [Chrome OS](https://support.google.com/chromebook/answer/177893?hl=en) * [iPad OS](https://support.apple.com/guide/ipad/get-started-with-accessibility-features-ipad9a2465f9/ipados) * [iOS](https://www.apple.com/accessibility/) * [Windows 11](https://www.microsoft.com/en-us/windows/accessibility-features?r=1)   Learning Management Systems (LMS) and Accessibility   * [Canvas Accessibility](https://www.instructure.com/products/canvas/accessibility) * [Blackboard Accessibility](https://help.blackboard.com/Learn/Student/Ultra/Accessibility) * [Google Classroom Accessibility](https://edu.google.com/intl/ALL_us/why-google/accessibility/) * [Schoology Accessibility](https://docs.powerschool.com/SGYH/en/system-administrators/getting-started-for-sys-admins/section-508-compliance-vpat)   Other Programs:   * [Texthelp](https://www.texthelp.com/products/) * [Read & Write for Google](https://chrome.google.com/webstore/detail/readwrite-for-google-chro/inoeonmfapjbbkmdafoankkfajkcphgd?hl=en-US) * [Microsoft Office Accessibility Suite](https://www.microsoft.com/en-us/accessibility) |  |
| How do educators implement the IEP/504 accommodations in a virtual learning environment? | List the accommodations recommended for the student and refer to these resources for examples of how to implement them. | * [Understood: IEP accommodations during distance learning](https://www.understood.org/en/articles/iep-accommodations-during-distance-learning): This article provides a chart depicting how common accommodations can be implemented in virtual learning environments. * [Wisconsin Virtual School: Examples to support students on IEP/ILP/504 plans](https://www.wisconsinvirtualschool.org/school-coordinator/special-populations.cfm) * [Wisconsin Virtual School IEP, 504, and EL](https://docs.google.com/document/d/1os3kj99xE0X93PgR7xjM-jYKhSdQMzKb6jMsD-FNkXg/edit) [Modification/Accommodation Guide](https://docs.google.com/document/d/1os3kj99xE0X93PgR7xjM-jYKhSdQMzKb6jMsD-FNkXg/edit) * [Wisconsin Department of Public Education: A Guide to Implementing IEPs and Monitoring Progress of IEP Goals When Moving Between In-Person, Hybrid, or Virtual Learning Environments for Individualized Education Program (IEP) Teams](https://dpi.wi.gov/sites/default/files/imce/sped/pdf/iep-guide-monitoring-progress-between-learning-environments.pdf) * [IRIS Center: Understanding Accommodations](https://iris.peabody.vanderbilt.edu/micro-credential/micro-accommodations/p01/): This article provides the definition of accommodations with examples that can be implemented in virtual learning environments. |  |

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## Supporting Family Participation

| **Questions to Ask** | **Considerations/ Resources** | **District/School Plan** |
| --- | --- | --- |
| Do you allow families to attend meetings in person or virtually? | Ensure parents have the appropriate technology to attend virtually |  |
| Do you require families to sign a contract agreeing to be present during class to assist students who may need assistance, such as support with using assistive technology or staying focused? | What resources or training might families need in order to support their child. |  |
| Do you provide families with resources related to IEP/504 plans? | * [Understood](https://www.understood.org/en/articles/iep-accommodations-during-distance-learning) - Provides many experiential and text-based resources for parents of children with disabilities, including: * [The IEP meeting: An overview](https://www.understood.org/en/articles/the-iep-meeting-an-overview) * [IEP accommodations during distance learning](https://www.understood.org/en/articles/iep-accommodations-during-distance-learning) * [IEP and special education terms](https://www.understood.org/en/articles/iep-terms-to-know) * [Center for Parent Information and Resources](https://www.parentcenterhub.org/cpir-resource-library/) - Provides a library of resources on subjects including; * [Accommodations](https://www.parentcenterhub.org/resourcelibrary/index/a/a1) * [American with Disabilities Act (ADA)](https://www.parentcenterhub.org/resourcelibrary/index/a/a3) * [Assistive Technology](https://www.parentcenterhub.org/resourcelibrary/index/a/a5) * [IEP](https://www.parentcenterhub.org/resourcelibrary/index/i/i2) * [Inclusion](https://www.parentcenterhub.org/resourcelibrary/index/i/i4) * [LRE/Placement](https://www.parentcenterhub.org/resourcelibrary/index/l/l1/) * [Section 504](https://www.parentcenterhub.org/resourcelibrary/index/s/s1/) |  |

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## Transitioning from a Virtual to a Blended or Full-time Face-to-Face School

It’s just as important to consider that the appropriate steps outlined in this guide have been addressed if students are transitioning from a virtual environment back to a blended or face-to-face environment, and that a copy of the IEP/504 plan is shared.

Critical to this point is that accommodations, assistive technologies, or accessible educational materials that may have been amended or deemed unnecessary in the virtual setting are reinstated as the student moves back to the face-to-face setting. For example, if preferential seating is an accommodation in a 504 plan when a student arrives at a virtual school, it’s likely that this may not be necessary since the student is working from home. If accommodations are appropriately amended for use in a virtual setting, such as preferential seating, the original recommendations should be noted so they can be reinstated in the plan if the student returns to the face-to-face classroom. Any device AT tools, such as text to speech, should still be offered in a face-to-face setting, even though the student isn't receiving instruction digitally.

## Resources:

[Annotated IEP with Distance Learning Considerations: Grade Three with Internet](https://education.vermont.gov/sites/aoe/files/documents/edu-annotated-iep-with-distance-learning-considerations-grade-3.pdf): This Guide, developed by the [Vermont Agency of Education](https://education.vermont.gov/sites/aoe/files/documents/edu-annotated-iep-with-distance-learning-considerations-grade-3.pdf), provides a step-by-step “think aloud” for developing an IEP for a student with a disability in a virtual setting. Although the example provided is fictitious, it includes questions, considerations, and potential plans to guide the process.Center on Inclusive Technology & Education Systems | cites.cast.org | CAST logo.
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