

The Dade Association of School Psychologists (DASP) would like very much to acknowledge the leadership and ingenuity demonstrated by M-DCPS' leadership staff, administrators and employees in attempting to meet the needs of our students. New ideas, strategies and models are being brought forth to organize this new era precipitated by the CoVid-19 pandemic. DASP strongly feels that everyone in our public-school community has risen to the challenges that have been created during this time. It is admirable that all these professionals are coming to the table with solutions to situations almost as quickly as they arise.

Bearing this in mind, DASP is seeking continued collaborations with M-DCPS in all efforts to problem solve for the future of the children that require psychological evaluations for placement in Exceptional Student Education. DASP is honored to continue our history of partnership with M-DCPS in providing answers and clarifications regarding legal and ethical components to the services provided by school psychologists. We would like to take this opportunity to discuss remote administration of standardized instruments to our children during this pandemic as well as any done in the future.

The importance and consequences of testing are known well by M-DCPS. For example, i-Ready results determine if and what interventions students need, the results from the Florida Standards Assessment are used to retain third grade students if their performance does not meet the proscribed cut-off level, and before graduating from high school, students must obtain the appropriate levels on end-of-course tests.

Similarly, the results of psychoeducational tests are used to help make decisions of consequence. Psychoeducational test results are utilized for placement into Exceptional Student Education (e.g Autism Spectrum Disorder, Developmental Delays, Intellectual Disabilities, Specific Learning Disabilities) as well as gifted placement.

Due to the consequences associated with high-stakes testing (the inability to administer these tests with appropriate test conditions and test security, and the fragile emotional health of our students during this time of crisis), the state has suspended their use for the current school year. These same concerns exist with the administration of many of the individualized standardized psychoeducational tests used by school psychologists.

Miami-Dade County Public Schools has done an incredible job of trying to maintain an instructional environment for all our students. Even so, challenges exist that would have a detrimental effect upon the use of remotely administered standardized, individualized psychoeducational tests. These challenges - lack of confidentiality and privacy, untrained use of parent proctors, secure technology, expanded informed consent, new liability protections, inability to defend results for due process or legal proceedings, lack of equivalency of results between in-person and remote administration within the home environment, inappropriate physical settings due to multiple family members operating in the same physical space-can affect test outcomes and may lead to erroneous conclusions placing children in educational settings that are inappropriate and harmful. Questions regarding test validity arise. For example, was a child's low performance on a test of intelligence due to a cognitive delay or simply that he could not follow the instructions of the remote test administrator. Perhaps, he was just too distracted by the physical environment of his home and could not appropriately attend to the test questions and/or tasks.

While individualized tests of intelligence and portions of academic assessments may be inappropriate for remote administration, DASP is very cognizant of the fact that during this pandemic there are voices pushing for distance testing – be it parents wanting their child to be tested for gifted identification, lack of timeline

flexibility for open referrals, or private practitioners whose livelihood is currently in jeopardy. Additionally, DASP acknowledges that children are reacting to the pandemic very differently depending upon their current living and family circumstances. Economic insecurity for many of our families has become a reality with the associated stressors for all family members. Some of our children are experiencing increased levels of neglect and/or abuse. Others have had existing emotional/behavioral difficulties exacerbated. Even for those children with the appropriate physical and emotional support and security, **normal does not exist**. It is critical that all these factors be considered when determining if a student is an appropriate candidate for distance testing. To assist us in how best to evaluate these students remotely, test publishers have provided guidelines to ensure accurate results for academic testing (https://www.pearsonassessments.com/professional-assessments/digital-solutions/telepractice/telepractice-and-the-keas-3.html?utm_medium=email&utm_source=TelepracticeNo3_LRNAS23868&utm_campaign=7010N000000PSb4&cmpid=7010N000000PSb4&mc_sid=545806865) and administration of the WISC-V (<https://www.pearsonassessments.com/professional-assessments/digital-solutions/telepractice/telepractice-and-the-wisc-v.html>) and RIAS (<https://pages.presencelearning.com/rs/845-NEW-442/images/Content-PresenceLearning-Equivalence-of-Remote-Online-Administration-of-RIAS-2-White-Paper.pdf>). In brief, there are five factors the examiner should address when planning to administer and score assessments via telepractice:

- Technology component: the audio-visual needs such as high-speed internet to provide optimum image and sound, two cameras on the examinee end to provide a peripheral view, ability to screen share, and the size of the image/screen. *Pearson strongly suggests using a third camera, such as a cell phone, so the examiner can periodically ask to see the testing environment, reducing the likelihood of the session being recorded.*
- Examiner: the need for training and practice, and opportunity and time to train the onsite facilitator (someone who lives with the child) if being utilized.
- Examinee: ensure that distance testing is appropriate for the examinee (Considerations must be made for students with various possible disabilities <https://michiganvirtual.org/research/publications/supporting-students-with-disabilities-in-k-12-online-and-blended-learning/>)
- Test materials: the need for test security
- Other concerns: the need to state in the report how the test was administered (distance testing) and the need for a statement regarding whether or not the results are reflective of the student's abilities.* Results that are not considered by the examiner to be reliable or valid cannot be reported. Changes to informed consent procedures need to be reflective of current testing conditions. Actions need to be in the best interests of the student and provide data/information that accurately represents the student's skills and behaviors.

*Several studies reference the equivalency of remote testing results to face to face testing (e.g. Q-global studies, RIAS). It should be noted that all studies cited by Pearson and others were conducted pre-pandemic and in a controlled setting such as in a school and with a trained facilitator not related to the examinee.

Before a final decision is made on distance testing, the following should be considered:

- Distance testing may exacerbate and highlight the **economic divide** among our students and inadvertently discriminate. Although the district has a 92% log in rate, 29 M-DCPS schools recorded average attendance rates below 80% for the first two weeks of April. 92% of the students in those schools are considered economically disadvantaged and most of those students live in the central

region (<https://www.wlrn.org/post/miami-dade-schools-see-lower-virtual-attendance-low-income-immigrant-communities>).

- With multiple people in a residence, privacy and a quiet setting may be difficult to obtain
 - We need to be sensitive to the possibility that the adults in these households are among the people performing essential functions during the pandemic. This could mean there is no adult in the household who could function as a facilitator.
- Distance testing may exacerbate and highlight the **digital divide** among our students and inadvertently discriminate. M-DCPS has been proactive and distributed more than 105,000 devices and continues to do so. Yet, some families share devices among multiple children meaning that only one child at a time can access virtual education (<https://www.wlrn.org/post/miami-dade-schools-see-lower-virtual-attendance-low-income-immigrant-communities>). The use of the device for distance evaluation will by necessity, permit only the child who is being assessed to use the device. The learning curve for parents and children who are not used to having access to technology at home may be steep.
- Distance testing may exacerbate and highlight the **cultural divide** among our students. Many students of M-DCPS are English Language Learners. Best practice requires that these students be offered the opportunity to be evaluated in their native language, which M-DCPS addresses during face to face testing. The district will need to comply with the cultural and linguistic needs of these students when being evaluated using distance testing instruments.
- The district will need to meet compliance with all FERPA requirements. It is recommended that any platform used for distance testing be certified HIPAA compliant which meets all FERPA requirements. Consents need to be revised to include the possible consequences associated with distance testing. The issues of liability need to be explored by the Legal Department to provide information regarding liability protection for practitioners providing distance testing.
- With those students and referrals appropriate for distance testing, a pilot study is proposed to determine the feasibility of possible future large-scale teleassessment. School psychologists currently trained on Q-global and who have access to computerized tests should be selected for limited assessments to determine the feasibility of distance testing. All the above requisites must be met in addition to the following:
 - Cognitive (individually administered IQ test)– if the internet capabilities, camera angles, test security (internet capability should be encrypted), and facilitator competency can be established:
 - May be appropriate for Gifted referrals and with instruments that do not require the assistance of trained facilitator (e.g. the nonmotor GAI of the WISC-V could be utilized.) **For all students whom do not meet test criteria qualification from distance administration, an assessment with a different instrument will be administered when face-to-face assessment resumes.**
 - Not appropriate for: InD, ASD, DHH, VI unless a developmental scale can be utilized for significantly low performing students
 - Not recommended to violate the test security of more than one instrument so that other instrument choices will be available when face-to-face assessment resumes. The possibility exists that test security violations will invalidate the future use of this

instrument until such time test publishers have the opportunity to completely revise the instrument. This might include invalidation of this instrument for all practitioners.

- Process testing:
 - Not appropriate for any eligibility as sound/volume/clarity etc.
- Academic:
 - Reading (letter/word identification and comprehension) – appropriate
 - Math
 - Concepts/Application – appropriate
 - Computation – questionable as cannot view the process students use to solve the equation.
 - All parents have the right to opt out of teleassessment and have their child assessed when face-to-face assessment is again possible.
- Social-Emotional-Behavioral:
 - Continued use of electronic rating scales or those completed with parent/teacher over phone.

While preparation for effective and reliable distance testing will take time, M-DCPS school psychologists will continue to serve our students. M-DCPS school psychologists are currently meeting the FLDOE published guidelines that school psychologists can follow during this unprecedented time (<http://www.fl DOE.org/core/fileparse.php/19861/urlt/beess492020-pres.pdf>).

- Assist identifying students needing additional support during school closures: M-DCPS school psychologists are in frequent communication with school administrators and teachers checking on the mental and academic progress of our most fragile students (students previously referred but not evaluated and identified students with disabilities).
- Provide mental health support services: M-DCPS school psychologists are providing pertinent, timely and needed resources and support to teachers, students and parents
- Conduct components of initial evaluations and reevaluations that can be completed virtually: M-DCPS school psychologists have contacted teachers and parents asking them to complete rating scales and questionnaires which will be used to provide needed services for identified students.
- Conduct initial evaluations of children demonstrating developmental difficulties and possibly meeting criteria for participation in Prekindergarten programs for children with disabilities.
- Conduct reviews of initial evaluations privately conducted prior to the shelter in place emergency order of March 16, 2020.
- Provide virtual services for students as it relates to the individual education plans and 504 plans: M-DCPS school psychologists have begun participating in scheduled IEP meetings and will participate in 504 meetings and SST meetings once those plans are finalized.

Citations:

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Grosch, M.C., Gottlieb, M.C., & Cullum, C.M. (2011). Initial practice recommendations for teleneuropsychology. *The Clinical Neuropsychologist*, 25, 1119-1133.

Wright, A.J. (2018, January). Equivalence of remote, online administration and traditional, face-to-face administration of the Reynolds Intellectual Assessment Scale-Second Edition. Retrieved from <https://pages.presencelearning.com/rs/845-NEW-442/images/Content-PresenceLearning-Equivalence-of-Remote-Online-Administration-of-RIAS-2-White-Paper.pdf>