

**MEMORANDUM**

**TO:** Directors, Exceptional Children Program

 Lead Administrators, Charter Schools

 Lead Administrators, State Operated Programs

 Lead Administrators, Other Public School Units

**FROM:** Sherry H. Thomas, Director Carol Ann M. Hudgens, Section Chief

 Exceptional Children Division Policy, Monitoring and Audit

**DATE:** February 15, 2019

**RE: Documenting Related Services on Behalf of Students with Disabilities**

On January 25, 2019, the EC Division issued a [memo](https://drive.google.com/open?id=1dooWnUZKuS8Kef0sZOn7g25pnhNnojv4) alerting LEAs about preparing for migration of data from the Comprehensive Exceptional Children Accountability System (CECAS) to the Every Child Accountability and Tracking System (ECATS). The memo stated development of new Related Service Support Descriptions (DEC-4b) in CECAS and other IEP software (e.g. EdPlan), should stop on/after February 8, 2019. This remains true.

On February 1, 2019, additional [guidance](https://drive.google.com/open?id=1XAhgNTxwFVy7Oyn_s_soMJxCLrCqYBpq) on how to document related services on behalf of students was provided due to multiple questions from the field. Given unforeseen system barriers in both CECAS and EdPlan, implementation of the memo and guidance has been difficult. As such, the following procedures are recommended:

1. Do not use the Related Services Support Description (DEC-4b).
2. Document on-behalf-of related services in the IEP where it makes most sense/best meets the student’s needs. Some options include:
	1. Supplemental aids and services in the LRE section
	2. Technical assistance in the LRE section
	3. Present Level of Academic Achievement and Functional Performance
	4. Accommodations and Modifications
3. Regardless of where on-behalf-of related services are described in the IEP, ensure the parent understands what type of support the student/staff/environment will receive and who will be providing it.
4. In the IEP service delivery section, select which related service will provide the on-behalf of support. Document the frequency and location. Document the lowest number of minutes the system will allow in order to close/verify the form later. In the comments section, indicate where the on-behalf-of support is described in the IEP.
5. Ensure the related service provider is recognized as an IEP team member, both in the case manager’s records and in the system where applicable. This may require more than usual diligence on everyone’s part.
6. The related service provider should keep a paper record of the plan for support, including all the details above. A modified version of a plan of care would serve this purpose. Therapist plans will not be monitored, but they may be critical resources if data is not carried over completely/accurately in the migration to ECATS.

To reiterate, there are multiple ways to compliantly describe these support services.

This memo serves as final guidance on options for how to document these on-behalf-of services. Following this memo, administrators, IEP teams, and related service providers are encouraged to engage in local problem-solving to establish agreeable procedures for documenting on-behalf-of services until ECATS is launched.

SHT/CAH/ss