

Tips from the Special Education Division: School Closures

January 2026

The Special Education division receives questions each year about how school closures affect the delivery of special education and related services. This guidance provides high-level considerations for districts when school operations are disrupted due to **weather events, natural disasters, local bargaining, medical or public health emergencies, or other circumstances that result in school closures or delayed starts.**

While the specific cause and duration of a closure may vary, the principles below are intended to support districts in meeting their obligations under the Individuals with Disabilities Education Act (IDEA) and ensuring that students eligible for special education ultimately receive free appropriate public education (FAPE).

General Expectations During School Closures

When a school district is closed and educational services are **significantly disrupted for all or nearly all students**, federal guidance explains that the district is **not required to provide special education services during the period of closure**, as instruction is not occurring districtwide.

Districts, however, remain responsible for ensuring that students eligible for special education **ultimately receive FAPE**. Once school operations resume, districts must promptly implement IEPs, address any delayed timelines, and determine whether individual students require additional support as a result of the interruption.

Communication with Families

Clear and proactive communication is especially important during school closures. As a best practice, districts should communicate with families of students eligible for special education by:

- Explaining the nature of the closure or disruption and how missed school days will be addressed, if applicable;
- Describing any general impact on special education and related services; and
- Reaffirming the district's responsibility to ensure students receive FAPE.

Districts should also:

- Offer families the opportunity to request an IEP team meeting if they have concerns related to the interruption;



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- Identify a point of contact for special education and IEP-related questions; and
- Share key messaging internally with special education staff and building administrators prior to distribution.

Compensatory Education Considerations

Although services are generally not required during a districtwide closure, districts must consider whether **individual students** require compensatory education once services resume.

This determination:

- Must be made **on a case-by-case basis** by the student's IEP team; and
- Should consider whether the interruption resulted in a loss of educational benefit or regression in skills.

If compensatory education is required, services should be designed to address the student's individual needs and any progress lost as a result of the interruption.

Evaluation and IEP Timeline Requirements

School closures may affect certain special education timelines, depending on whether the timeline is measured in **school days** or **calendar days**.

- Days when school is closed do **not count as "school days"** for timelines measured in school days (e.g., referral timelines or evaluation completion timelines).
- Closures do **not affect timelines measured in calendar days**, including:
 - Holding an initial IEP meeting within 30 calendar days of eligibility;
 - Conducting annual IEP reviews; and
 - Completing reevaluations within three years.

Districts should complete any delayed timelines as soon as possible once school operations resume.

Out-of-District Placements (Nonpublic Agencies and Other Contracted Programs)

Students placed in out-of-district programs generally follow the calendar of the placement, which may remain open during a district closure. Regardless of the placement calendar, districts remain responsible for ensuring FAPE.

Districts should:

- Communicate with each placement to determine how services will continue during closures; and
- Plan for continued access to services, including transportation, if district operations are interrupted.

If a placement remains open but district-provided transportation is unavailable, districts may need to explore alternative options, such as:

- Reimbursement for alternative transportation;
- Coordinating with the placement for distance learning options; or
- Other allowable arrangements to maintain access to services.

Extended Closures and Public Health Conditions

In some situations, closures or absences may extend beyond a short period, including circumstances related to medical or public health conditions.

Key considerations include:

- If a student requires homebound instruction for an extended period (generally more than 10 consecutive school days), an IEP team meeting is required to review placement and services.
- If IEP goals remain the same and only service delivery time changes, the IEP may be amended accordingly.
- If a student is absent due to illness while school remains open, the IEP team must determine whether the student can benefit from alternative instructional options, such as virtual instruction, homework packets, or other distance-learning approaches.

All service delivery decisions should follow applicable health and safety guidance.

Resources

- [OSPI Special Education Bulletin No. 039-23](#) (local bargaining & IDEA requirements)
- [OSEP Q&A: Providing Services to Children with Disabilities during an H1N1 Outbreak](#)
- [OSPI Q&A Regarding the Provision of Services to Students with Disabilities During School Closures for COVID-19](#)
- [OSPI Special Education COVID-19 Guidance Webpage](#)