



November 2020

# DISTANCE LEARNING

## Challenges Providing Services to K-12 English Learners and Students with Disabilities during COVID-19

Accessible Version

# GAO Highlights

Highlights of [GAO-21-43](#), a report to congressional committees

## Why GAO Did This Study

Due to the Coronavirus Disease 2019 (COVID-19) pandemic, almost all school districts rapidly shifted to distance learning in spring of the 2019-2020 school year. This shift laid bare both the logistical and instructional challenges of distance learning, particularly for English learners and students with disabilities, both of whom have faced persistent achievement gaps.

This work was conducted as part of GAO's COVID-19 monitoring and oversight responsibilities under the CARES Act. It examines what is known about the challenges of and lessons learned from providing distance learning to English learners and students with disabilities during school building closures in spring 2020.

GAO reviewed distance learning plans from a nongeneralizable group of 15 school districts, selected for their high proportion of either English learners or students with disabilities. GAO also interviewed district officials in four of these 15 districts, selected based on the districts' detailed plans for distance learning for either group of students; interviewed advocates, researchers, and representatives of associations of school administrators and related service providers; reviewed relevant federal laws including IDEA, regulations, and guidance; and interviewed federal officials.

View [GAO-21-43](#). For more information, contact Jacqueline M. Nowicki at (617) 788-0580 or [nowickij@gao.gov](mailto:nowickij@gao.gov).

November 2020

## DISTANCE LEARNING

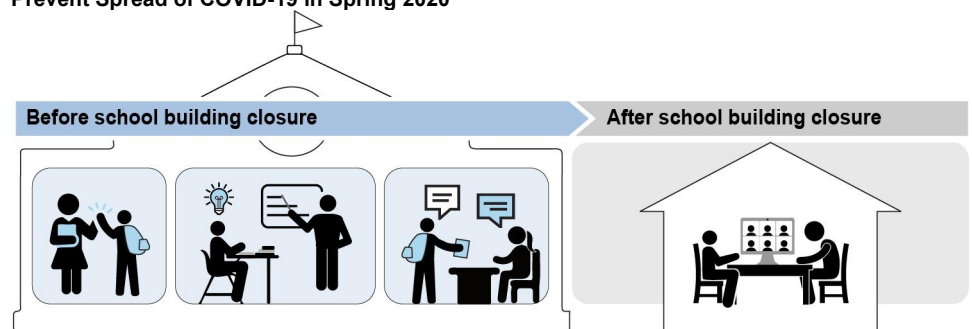
### Challenges Providing Services to K-12 English Learners and Students with Disabilities during COVID-19

## What GAO Found

Some English learners and their families had difficulty fully participating in distance learning during spring 2020 due to a lack of necessary technology, language barriers, and the demands of meeting basic family needs. English learners lost opportunities to practice their language skills, according to school district officials and representatives of professional associations. Also, limited English comprehension affected the ability of families to assist students with the curriculum, according to representatives of professional associations and a technical assistance center. Stakeholders also told GAO that some school districts addressed aspects of these challenges by, for example, increasing access to the internet and devices and adapting materials and instructional methods. One school district partnered with a Spanish language TV network to broadcast curriculum for an hour every day. However, many of the major challenges with engaging English learners in distance education remained. For example, one district mailed home a workbook in both English and Spanish to help students access online learning, but this did not address the needs of students who speak one of the other approximately 90 languages in the district.

Similarly, a variety of factors complicated the delivery of special education services during distance learning, according to officials from the four districts selected by GAO and representatives of national organizations of school administrators and service providers. Such factors included: the wide range of needs of students with disabilities served under the Individuals with Disabilities Act (IDEA); the services specified in their individualized education programs; and the capacity of parents or caregivers to assist teachers and service providers in delivering general education, specialized instruction, and related services to their children. Delivering related services—such as occupational therapy, physical therapy, or speech therapy—for students with complex needs was particularly difficult to do remotely. School district officials we spoke with said they successfully addressed some challenges by modifying instruction, holding virtual meetings with parents, and encouraging collaboration between general and special education teachers. For example, some districts altered students' goals and services in temporary distance learning plans. Officials from two districts told us they are considering using virtual meetings after returning to in-person education and would use them, as warranted, during future school closures.

#### Delivery of K-12 Special Education Services before and after School Buildings Closed to Prevent Spread of COVID-19 in Spring 2020



Source: GAO analysis of interviews. | GAO-21-43

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# Contents

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Letter		1
	Background	3
	School Districts Addressed Challenges Providing Distance Learning to English Learners and Students with Disabilities by Increasing Outreach and Adapting Instruction, Materials, and Service Delivery Where Possible	8
	Agency Comments and Third Party Views	21
<hr/>		
Appendix I: Organizations Interviewed		24
Appendix II: School District Selection		26
Appendix III: GAO Contacts and Staff Acknowledgments		28
Appendix IV: Accessible Data		29
	Data Tables	29
<hr/>		
Table		
	Table 1: Characteristics of the 15 Selected School Districts	27
<hr/>		
Figure		
	Figure 1: Examples of Related Services that Some Students with Individualized Education Programs May Receive in Addition to General and Special Education	16
	Accessible Data for Delivery of K-12 Special Education Services before and after School Buildings Closed to Prevent Spread of COVID-19 in Spring 2020	29
	Accessible Data for Figure 1: Examples of Related Services that Some Students with Individualized Education Programs May Receive in Addition to General and Special Education	30

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### **Abbreviations**

COVID-19	Coronavirus Disease 2019
Education	Department of Education
ESEA	Elementary and Secondary Education Act of 1965
FAPE	free appropriate public education
IDEA	Individuals with Disabilities Education Act
IEP	individualized education program
NAEP	National Assessment of Educational Progress
NCES	National Center for Education Statistics

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November 19, 2020

Congressional Committees

Due to the ongoing Coronavirus Disease 2019 (COVID-19) pandemic, as of September 21, 2020, 74 of the 100 largest school districts in the United States had chosen distance learning as their only back-to-school instructional model for the 2020-2021 school year, according to data from Education Week.<sup>1</sup> The rapid shift to distance learning in spring 2020, after nearly all U.S. school buildings were closed to prevent the spread of the virus, laid bare both the logistical and instructional challenges of educating students via distance learning, particularly certain subgroups of students with additional needs, such as English learners and students with disabilities. The 5 million public school students (about 10 percent) who are English learners and over 7 million (14 percent) who receive special education services have faced persistent achievement gaps compared to other student subgroups.<sup>2</sup>

We are conducting this work as part of GAO's COVID-19 monitoring and oversight responsibilities under the CARES Act.<sup>3</sup> This report examines what is known about the challenges of and lessons learned from teaching English learners and students with disabilities during COVID-19 related school closures in the spring of the 2019-2020 school year.

To obtain information for this report:

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<sup>1</sup>Data based on *School Districts' Reopening Plans: A Snapshot (2020, July 15)*. Education Week. Accessed September 8, 2020, <https://www.edweek.org/ew/section/multimedia/school-districts-reopening-plans-a-snapshot.html>.

<sup>2</sup>Data on English learners are from fall 2017; data on students with disabilities are from school year 2018-2019. B. Hussar, J. Zhang, S. Hein, K. Wang, A. Roberts, J. Cui, M. Smith, F. Bullock Mann, A. Barmer, and R. Dilig. (2020). *The Condition of Education 2020* (NCES 2020-144). Department of Education. Washington, DC: National Center for Education Statistics. Accessed October 8, 2020, <https://nces.ed.gov/pubsearch/pubsinfo.asp?pubid=2020144>. These groups are not mutually exclusive. According to data from the Department of Education, in fall 2017, 14.3 percent of English learner students in public schools were also students with disabilities who were served under the Individuals with Disabilities Education Act.

<sup>3</sup>Pub. L. No. 116-136, § 19010, 134 Stat. 281, 579-81 (2020).

(1) We interviewed officials from the Department of Education (Education); representatives of organizations that advocate for students; representatives of associations of educators, school administrators, and special education administrators; and representatives of three technical assistance centers supported by Education.<sup>4</sup> We also interviewed representatives of three professional associations of service providers—occupational therapists, speech therapists, and school psychologists—and four research organizations. During those interviews we asked about challenges districts faced and approaches used to address them. See appendix I for the list of organizations we interviewed.

(2) We reviewed “distance learning plans” from a nongeneralizable selection of 15 school districts to determine how they served English learners and students with disabilities. We use the term distance learning plans to mean materials that explain how school districts provided education during distance learning. For example, distance learning plans may describe the delivery of general education, special education, and other school-based programs. They may also include information about education materials, including those adapted to meet individual student needs; the delivery of related services such as physical therapy, occupational therapy, and emotional and behavior management; and guidance to special education teachers and paraprofessionals or letters to parents. We selected the 15 districts for their high proportion of either English learners or students with disabilities. We also considered recommendations from interviewees and looked for school districts in settings with a variety of population densities. See appendix II for more information on our selection of the 15 school districts.

(3) We conducted semi-structured interviews with officials from four of the 15 school districts that sent us documents for review. We selected the four districts based on their detailed plans for distance learning for either English learners or students with disabilities.

(4) We reviewed relevant information from Education, such as Fact Sheets and Questions and Answers; federal laws; and federal regulations and policies about special education and distance learning during COVID-19 school closures.

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<sup>4</sup>Education supports many technical assistance providers that provide content expertise, evidence-based tools and resources, and direct support to state and local educational agencies, among others. Specifically, these providers address agencies’ needs and assist with implementation of federal programs.

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We conducted this performance audit from April 2020 to November 2020 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

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## Background

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### English Learners

Students identified as English learners are provided with language instruction educational programs and are distinguished by certain characteristics.

- Language instruction educational programs are designed to help ensure that students who are identified as English learners attain English proficiency and meet the academic content and achievement standards that all students are expected to meet. These programs may include, but are not limited to, Structured English Immersion programs, Transitional Bilingual Education, or Dual Language Programs.
- In fall 2017, students identified as English learners constituted an average of 14.7 percent of total public school enrollment in cities, 9.6 percent in suburban areas, 6.8 percent in towns, and 4.1 percent in rural areas.<sup>5</sup> In general, as of 2017, English learners make up a higher percentage of public school students in lower grades than of those in upper grades. For example, 15.9 percent of kindergarteners were English learners, compared with 8.6 percent of 6th-graders and 7.0 percent of 8th-graders.
- Researchers have found that from 2004 to 2016, higher percentages of households with children where a language other than English is

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<sup>5</sup>Hussar and Zhang (2020). *The Condition of Education 2020* (NCES 2020-144). Accessed September 2, 2020, <https://nces.ed.gov/pubsearch/pubsinfo>.

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spoken were categorized as poor (0-99 percent of the federal poverty level) compared to English-speaking only households with children.<sup>6</sup>

- The academic achievement gap between English learners and students who are not English learners has remained roughly the same over the last decade, based on the National Assessment of Educational Progress (NAEP) reading and mathematics scores of 4<sup>th</sup>- and 8<sup>th</sup>-graders.<sup>7</sup>

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## Students with Disabilities

Students with disabilities may be eligible for special education services and are distinguished by certain characteristics.

- Under the Individuals with Disabilities Education Act (IDEA), all eligible students with disabilities are entitled to a free appropriate public education (FAPE).<sup>8</sup> FAPE includes special education and related services—such as speech therapy, psychological services, occupational therapy, and physical therapy—that, among other requirements, are provided in conformity with an individualized education program (IEP).<sup>9</sup> An IEP is a written plan developed by a team of school officials, parents, and the student (when appropriate), that includes a statement of the student’s present levels of academic achievement and functional performance, annual goals, and a statement of the special education and related services and

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<sup>6</sup>Child Trends, (2019) *Dual Language Learners*, accessed October 5, 2020, <https://www.childtrends.org/indicators/dual-language-learners>.

<sup>7</sup>In 2019, students who were not English learners scored higher than English learners on the NAEP math and reading tests for 4th- and 8th-graders. NAEP math and reading assessment results for 4th- and 8th-grades are reported as average scores on a 0-500 scale. The point differences on the scale scores are as follows: 4th-grade reading-33 points; 8th-grade reading-45 points; 4th-grade math-24 points; 8th-grade math-42 points. Department of Education, Institute of Education Sciences, National Center for Education Statistics, *Digest of Education Statistics, 2019*, tables 221.12 (October 2019) and 222.12 (November 2019).

<sup>8</sup>20 U.S.C. § 1412(a)(1).

<sup>9</sup>20 U.S.C. § 1401(9).



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supplementary aid and services needed to attain those goals, among other information.<sup>10</sup>

- In 2018-2019, 7.1 million students ages 3-21 received special education services under IDEA, or 14 percent of all public school students.
- The academic achievement gap between students with and without disabilities has remained roughly the same over the last decade, based on the NAEP reading and mathematics scores of 4<sup>th</sup>- and 8<sup>th</sup>-graders.<sup>11</sup>

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## Education's Role with Respect to English Learners and Students with Disabilities

Education plays many roles in supporting educational opportunities for English learners and students with disabilities, including overseeing federal education laws and civil rights laws, and related funding, including:

- Title VI of the Civil Rights Act of 1964 (Title VI), which prohibits discrimination on the basis of race, color, or national origin in any program that receives federal funds or assistance.<sup>12</sup> In order to comply with Title VI, school districts must take affirmative steps to

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<sup>10</sup>Members of the IEP team may also include, at the discretion of the parent or school, other individuals who have knowledge or special expertise regarding the student. 20 U.S.C. § 1414(d).

<sup>11</sup>In 2019, students without disabilities scored higher than students with disabilities on the NAEP math and reading tests for 4<sup>th</sup>- and 8<sup>th</sup>-graders. NAEP math and reading assessment results for 4<sup>th</sup>- and 8<sup>th</sup>-grades are reported as average scores on a 0-500 scale. The point differences on the scale scores are as follows: 4<sup>th</sup>-grade reading-42 points; 8<sup>th</sup>-grade reading-39 points; 4<sup>th</sup>-grade math-30 points; 8<sup>th</sup>-grade math-40 points. Department of Education, Institute of Education Sciences, National Center for Education Statistics, *Digest of Education Statistics, 2019*, tables 221.12 (October 2019) and 222.12 (November 2019).

<sup>12</sup>42 U.S.C. § 2000d.

ensure that students with limited English proficiency can meaningfully participate in the district's educational programs and services.<sup>13</sup>

- IDEA was enacted to ensure, among other things, that all children with disabilities have access to FAPE that emphasizes special education and related services designed to meet their unique needs and prepare them for further education, employment, and independent living.<sup>14</sup>
  - In general, under IDEA, a child with a disability refers to a child with intellectual disabilities, hearing impairments (including deafness), speech or language impairments, visual impairments (including blindness), serious emotional disturbance, orthopedic impairments, autism, traumatic brain injury, other health impairments, or specific learning disabilities who needs special education and related services as a result of the disability.<sup>15</sup>
- Section 504 of the Rehabilitation Act of 1973, which prohibits discrimination on the basis of disability in programs or activities that receive federal financial assistance.<sup>16</sup>
- Title II of the Americans with Disabilities Act of 1990, which prohibits discrimination on the basis of disability by public entities, whether or not they receive federal financial assistance.<sup>17</sup>
- The Elementary and Secondary Education Act (ESEA), as amended, which among other things, promotes efforts to close educational

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<sup>13</sup>*Lau v. Nichols*, 414 U.S. 563 (1974). Furthermore, according to guidance from the Department of Education and the Department of Justice, school districts generally may not segregate students on the basis of national origin or English learner status, though certain programs may involve English learners receiving separate instruction for a limited portion of the day or period of time. For more information on requirements related to English learners, see Department of Education and Department of Justice, *Ensuring English Learner Students Can Participate Meaningfully and Equally in Education Programs* (Washington, D.C.: January 2015). The Office for Civil Rights at the Department of Education and the Civil Rights Division at the Department of Justice share authority for enforcing most civil rights laws in the education context. The Department of Justice also enforces Title IV of the Civil Rights Act of 1964 and the Equal Educational Opportunities Act of 1974.

<sup>14</sup>20 U.S.C. § 1400(d). For additional information on our work on IDEA, see GAO, *Special Education: Varied State Criteria May Contribute to Differences in Percentages of Children Served*, [GAO-19-348](#) (Washington, D.C.: Apr. 11, 2019).

<sup>15</sup>20 U.S.C. §1401(3)(A).

<sup>16</sup>Codified at 29 U.S.C. § 794.

<sup>17</sup>42 U.S.C. §§ 12131 – 12134.

achievement gaps by, in part, focusing attention on historically low-performing subgroups, including English learners and students with disabilities.<sup>18</sup>

After passage of the CARES Act in March 2020, Education quickly obligated emergency funding to address the effects of the COVID-19 pandemic on education, including more than \$13.2 billion through the Elementary and Secondary School Emergency Relief Fund. The fund was established by the CARES Act to support, among other things, continued learning for K-12 students whose educations have been disrupted by the pandemic.<sup>19</sup>

Education also supports state educational agencies and local school districts by providing guidance and technical assistance. For example, in guidance issued in March 2020, Education noted that if school districts continue to provide educational opportunities to the general student population during a school closure, the school must ensure that students with disabilities also have equal access to the same opportunities, and that FAPE applies.<sup>20</sup> While Education has noted that FAPE still applies in these circumstances, Education has also recognized that during the national emergency, schools may not be able to provide all services in the same manner they are typically provided.<sup>21</sup> According to the March 2020 guidance from Education, states, school districts, and schools must ensure that, to the greatest extent possible, each student with a disability

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<sup>18</sup>The Every Student Succeeds Act (ESSA), enacted on December 10, 2015, reauthorized the Elementary and Secondary Education Act of 1965 (ESEA). Pub. L. No. 89-10, 79 Stat. 27 (1965), as amended by Pub. L. No. 114-95, 129 Stat. 1802 (2015).

<sup>19</sup>States and school districts have significant flexibility as to how they spend these funds, including whether they spend any portion of them on students with disabilities or English learners. As of July 31, 2020—the most recent date we reported CARES Act spending data—the spend rate for CARES Act funds for K-12 schools (specifically through the Economic Stabilization Fund, or ESF) remained low and few recipients had drawn down their grants. Education officials and organizations representing state governments and state educational agencies noted a number of contributing factors for low spend rates, including normal grantmaking procedures, and the need to develop new health and safety procedures for physically reopening schools. See GAO, *COVID-19: Federal Efforts Could Be Strengthened by Timely and Concerted Actions*, [GAO-20-701](#), (Washington, D.C.: Sept. 21, 2020).

<sup>20</sup>Department of Education, *Questions and Answers on Providing Services to Children with Disabilities During the COVID-19 Outbreak* (Washington, D.C.: Mar. 12, 2020).

<sup>21</sup>Department of Education, *Supplemental Fact Sheet Addressing the Risk of COVID-19 in Preschool, Elementary and Secondary Schools While Serving Children with Disabilities* (Washington, D.C.: Mar, 21, 2020).

is provided the special education and related services identified in the student's IEP.

In May 2020, Education issued guidance noting that if a school district provides remote learning for its students, it must continue to provide language instruction services and language accommodations for content classes to English learners.<sup>22</sup> In addition, during the spring and summer 2020, Education:

- Shared guidance on strategies to serve students experiencing homelessness, providing meals during school closures, and grant administration and flexibility guidance;
- Provided technical assistance activities such as webinars, and links to resources for students and families, such as tips on ways to help students adapt to distance learning and for locating free meal services; and
- Invited waiver requests for requirements under Title I, Part A of ESEA regarding statewide assessments, accountability and school identification, and some reporting requirements for the 2019-2020 school year. All 50 states, Washington, D.C., Puerto Rico, and the Bureau of Indian Education submitted requests and received approval for these waivers.<sup>23</sup>

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## School Districts Addressed Challenges Providing Distance Learning to English Learners and Students with Disabilities by

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<sup>22</sup>Department of Education, Office of Elementary and Secondary Education, *Fact Sheet: Providing Services to English Learners During the COVID-19 Outbreak* (Washington, D.C.: May 18, 2020).

<sup>23</sup>In its report to Congress on April 27, 2020, Education did not request waiver authority for any of the core tenets of IDEA, including the right to a free appropriate public education, but did request waiver authority for several requirements, including provisions regarding early childhood transition timelines. *Report to Congress of U.S. Secretary of Education Betsy DeVos: Recommended Waiver Authority Under Section 3511(d)(4) of Division A of the Coronavirus Aid, Relief, and Economic Security ('CARES Act')* Apr. 27, 2020.

## Increasing Outreach and Adapting Instruction, Materials, and Service Delivery Where Possible

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### School Districts Faced Challenges Engaging English Learners in Distance Learning

According to school district officials, representatives of advocacy groups and professional associations, and education researchers we interviewed, some English learners and their families had difficulty fully participating in distance learning during spring 2020 due to lack of necessary technology, language barriers, and the demands of meeting basic family needs.

#### Access to Technology

Students who lacked access to broadband, internet service, computers, or other digital devices had difficulty participating in distance learning.<sup>24</sup> Representatives of professional associations and a technical assistance center and education researchers told us that English learners were disproportionately affected by lack of access to technology, meaning these students could not always access or fully participate in distance learning, and school districts could not always communicate the expectations and logistics of distance learning to students and their families.

Based on district documents we reviewed and interviews with district officials, distance learning incorporated both print and electronic materials. Some districts provided resources to English learners through online language-learning platforms. However, students without internet connectivity or devices could not access these resources. In some cases, even when families had access to technology, data limits and limited numbers of devices did not meet the needs of multiple students learning at home, according to a researcher.

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<sup>24</sup>See for example, The Education Trust, "Education Equity in Crisis: The Digital Divide" accessed Sept. 16, 2020, <https://west.edtrust.org/resource/education-equity-in-crisis-the-digital-divide/> and Education Week, "The Disparities in Remote Learning Under Coronavirus," accessed Sept. 16, 2020, <https://www.edweek.org/ew/articles/2020/04/10/the-disparities-in-remote-learning-under-coronavirus.html>.

At the start of the pandemic, school districts communicated extensively with students and families about distance learning curricula, scheduling, and digital platforms, and this information was generally shared through email and online educational platforms, according to district documents we reviewed. However, district officials and researchers told us that limited connectivity and access to devices made it difficult for English learners and their families to obtain this information, and made it difficult for school staff to collaborate and problem solve with them. For example, officials from one district said that they put together webinars for families of English learners with information on how to access distance learning but many families were unable to attend because they did not have computers.

### Language Barriers

Language barriers compounded technology issues. School district officials and representatives of professional associations told us that even when families had sufficient access to the internet and devices, they did not always understand web-based instruction formats such as webinars, and the language barrier made it difficult for school personnel to explain how these methods worked. An official from one district said that even though they used translation services to help parents with the logistics of distance learning, it was difficult to explain how to navigate the technology needed to participate in distance learning via a remote translator. The official explained that some of the most traditionally effective means of communicating with families of English learners, such as interacting during school drop off and pick up, were no longer available to them.

School district officials and representatives of professional associations told us that during distance learning students did not have the opportunities they normally would during the school day to practice their language skills with English speakers. For example, many students did not have English speakers in their home and were not surrounded by their classmates, which would typically provide an opportunity for informal language practice. In addition, students may not have had access to synchronous sessions (live sessions with a teacher, for example, via video conference) with their teachers, according to district officials. According to district officials, representatives of advocacy groups and professional associations, and education researchers, the extent to which distance learning curriculums used synchronous teaching and asynchronous learning materials (course content that can be accessed at any time) varied widely by district and even by school and teacher. Synchronous language instruction for English learners could depend on

teacher preferences and availability for live sessions, which in some cases was not offered or conflicted with student availability. Officials from one district told us that wide disparities existed across the district in how much teachers chose to engage in synchronous teaching and, as a result, students had very different experiences throughout the district.

Limited English comprehension also affected the ability of families to assist students with the distance learning curriculum, according to representatives of professional associations and a technical assistance center. According to district officials we interviewed, distance learning curriculums were often dependent on family support, especially for younger students. Officials from one district with a large population of English learners said that these students are heavily concentrated in younger grades, and therefore need more support with learning at home. However, family members who could not understand the lessons or instructions could not always provide this support. Representatives from one technical assistance center supported by Education told us they observed that many of the online lessons teachers used for English learners were very different from lessons offered in a traditional classroom, and did not have captions or other language support, making it difficult for many families of English learners to assist their students. The difficulties of distance learning for English learners, exacerbated by language barriers, may reinforce existing achievement gaps for these students, according to representatives from one of Education's technical assistance centers.

### Demands of Meeting Basic Family Needs

School district officials and representatives of professional associations told us that English learners and their families were more likely than other student groups to have responsibilities that prevented them from fully participating in distance learning. For example, parents were not always available to help students because they were more likely to be essential workers required to work outside the home, according to a district official. In addition, some older English learner students were responsible for caring for younger siblings or working to help support their families, likely due to COVID-19 job losses in their families. As a result, English learner students were at times unable to participate in distance education.

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## School Districts Addressed Challenges by Increasing Outreach and Adapting Materials for English Learners

According to school district officials, representatives of professional associations, and education researchers, some school districts were able to address aspects of challenges created by distance learning by increasing access to the internet and devices, using creative communication strategies, and adapting materials and instructional methods. However, many of the major challenges with engaging English learners in distance education remained.

### Increasing Internet Connectivity and Access to Devices

According to school district officials, representatives of professional associations, and education researchers, many school districts attempted to increase internet connectivity by paying for internet service, providing mobile WiFi hotspots, or providing free laptops or other devices. While these efforts helped students in general, they were particularly helpful for English learners given their disproportionate lack of access to technology. Officials in one large, suburban district told us that they were able to increase access to the point that 98 percent of their students had interacted with the online distance learning platform over the spring.

### Using Creative Communication Strategies

School district officials, representatives of professional associations, and researchers told us that school districts looked for creative ways to connect with English learners and their families. A researcher and representatives of a professional association told us that districts had more success reaching English learner families through texting and smartphone messaging applications than via email. In addition, representatives from two professional associations told us that families of English learners may be fearful of government authorities. To increase families' comfort levels with school personnel, and to provide materials, some teachers visited students' homes for socially distanced conversations, according to representatives of other professional associations. In one case, a teacher arranged a pizza delivery to a student's home and attached a note with her contact information. Officials we spoke with in one district with a large percentage of English learners told us that they maintained communication by hosting a virtual game night for families of English learners, and had a partnership with the local



library system so families could pick up books at the library and then participate in a virtual storytelling session.

According to district officials, some schools translated videos and some created dedicated hotlines to translation services to help families more easily understand options and available resources. For example, officials we spoke with in one district told us they created videos in several languages with instructions on how to access virtual learning resources. In another district, an official told us they used a phone service that parents can call to immediately get a translator for almost any language—a service the official said works well for specific questions, but is inadequate for conveying complex information about distance learning.

Representatives from professional associations told us that, in some instances, these efforts to communicate strengthened the connection between educators and English learners and their families. A representative from one professional association said that distance learning has made some districts realize they need to help families of English learners have more of a voice within the school community. For example, an official from one district told us that while the district does not have a large proportion of English learners, it has families representing over 40 languages. Distance learning made district officials realize they need to do more in the future to facilitate translation and communication with families of English learners. Representatives from a technical assistance center told us that many school districts have done a great deal to engage the community, including providing opportunities for parents, caregivers, and families to provide input about what distance learning should look like moving forward. But information on those opportunities is often only disseminated in English, so there is an information gap in terms of which families can participate.

### Adapting Materials and Instructional Methods

According to school district officials, some schools adapted materials and instructional methods to better serve English learner students and help bridge the language barrier with their families. An official from one district told us that due to the district's high number of Spanish speaking students, it partnered with a Spanish language TV network to broadcast curriculum for an hour every morning. This made learning more accessible for both students and families, according to the official. Based on district documents we reviewed, many districts provided supplemental resources, such as web pages with links to resources for English language learning. For example, officials from one school district told us

that the district was able to take advantage of tools such as free subscriptions for language learning programs offered by some vendors. In some cases, schools had been using these online programs prior to distance learning, which made the transition easier for students and teachers, according to representatives of a professional organization and officials in one district. Officials we spoke with in another large district said they created a paper workbook for students in both English and Spanish and mailed it to students' homes to help students who were having trouble accessing online distance learning. However, this solution would not necessarily address the needs of the district's students who speak one of the other approximately 90 home languages.

Officials in one district told us that parents of some English learners became more involved in their child's education when they had access to translated materials. In addition, parents of some English learners were able to better understand what their children were learning and discuss schoolwork in their native language, according to representatives of one professional association. Officials from three districts told us that while synchronous instruction was not always available to students in spring 2020, they have standardized expectations for teachers to provide synchronous instruction and all students should have access to their teachers in fall 2020. Such instruction may help facilitate more live language practice for English learners.

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### School Districts Faced a Number of Challenges in Providing Distance Learning to Students with Disabilities, Particularly the Delivery of Related Services

According to officials from selected school districts, national organizations representing school administrators and service providers, and researchers, a variety of logistical and instructional factors made it more difficult to deliver special education services during distance learning.<sup>25</sup> Such factors included the wide range of student needs and the services specified in their individualized education programs (IEP) and the capacity of parents or caregivers to assist teachers and service providers in delivering general education, specialized instruction, and related services to their children.

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<sup>25</sup>According to guidance from Education, states, school districts, and schools must ensure that, to the greatest extent possible, each student with a disability can be provided the special education and related services identified in the student's IEP.

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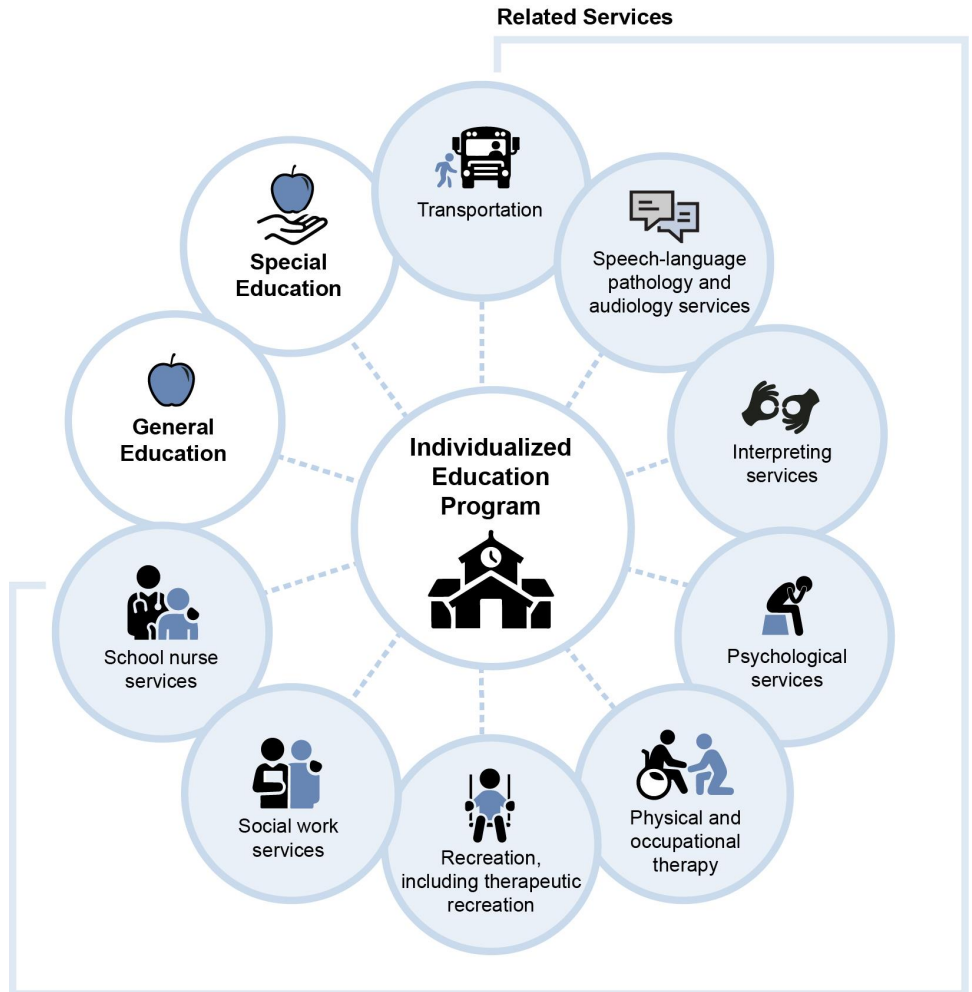
Range of Student Needs and Services

Students with disabilities are a diverse group with a wide range of abilities and needs. Students with disabilities who have IEPs are generally identified as having one or more of a variety of different disability categories recognized under IDEA, including but not limited to, intellectual disabilities, hearing impairments (including deafness), speech or language impairments, visual impairments (including blindness), serious emotional disturbance, orthopedic impairments, autism, traumatic brain injury, other health impairments, and specific learning disabilities.<sup>26</sup> The diversity of their needs and abilities is reflected in the wide variety of goals and supports identified in their IEPs. As a result, the types of services provided and the number of hours per week of specialized instruction may differ for each student, making it difficult for school districts to plan and schedule the delivery of such supports. (See fig. 1.) Accordingly, none of the 15 school district distance learning plans we reviewed included details on how the specialized instruction or related services specified in students' IEPs would be provided. Rather, many of the district plans simply noted that parents of students with disabilities would be contacted individually by a special education teacher.

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<sup>26</sup>20 U.S.C. §1401(3)(A).

**Figure 1: Examples of Related Services that Some Students with Individualized Education Programs May Receive in Addition to General and Special Education**



Source: GAO analysis of the Individuals with Disabilities Education Act (IDEA) 20 U.S.C. § 1401(26). | GAO-21-43

Note: Under IDEA, a free appropriate public education means special education and related services that, among other things, are provided in conformity with students' individualized education programs. Some students with disabilities may not receive related services while others may receive one or more services. Related services may include some of the services outlined above and are defined in IDEA at 20 U.S.C. § 1401(26).

Many of the 15 selected school districts shortened their school day during distance learning for all students, sometimes to only a few hours, and often had limited live communication time with the teacher, according to our review of district plans. Officials in two of the four districts and representatives from advocacy groups noted that the shorter school days made it especially difficult to find time to provide the specialized

instruction and related services detailed in students' IEPs on top of regular general education. For example, one district official described a student's IEP that called for 4 hours of individualized special education instruction per day, but the school day during distance learning was less than 4 hours. Hence, the student did not receive the full 4 hours of individualized instruction, much less participate in the general education class time.

School officials from all four districts told us that delivering related services—such as occupational therapy, physical therapy, or speech therapy—for students with complex needs was particularly difficult in a virtual setting. Officials from one district and researchers raised concerns about students not receiving services in the same manner as they did prior to distance learning, including occupational and physical therapy that involved hands-on instruction from therapists or required specialized equipment unavailable in students' homes. For example, students at home may not have access to technology (such as braille readers) that they use at school to help them communicate.

### Parental Capacity to Assist

Distance learning required school districts to rely on parents or other caregivers to take a more active role in providing education and services identified in their children's IEPs. Given some students' instructional needs, multiple teachers, aides, and therapists may be involved in providing education and additional support services. We heard from school district officials, researchers, and national associations of service providers that parents were overwhelmed with the number of roles they were being asked to assume. For example, parents may take on the roles of teachers while simultaneously assuming the responsibilities of aides to help their children behave appropriately, and of service providers to help their children perform the tasks discussed by teachers. Additionally, this could involve parents learning how to use students' learning devices or specialized equipment that differs from those normally used at home. Some parents were unable to assist providers because of other responsibilities, such as work or caring for other children, according to district officials, researchers, and national associations of service providers. For families where caregivers worked outside the home, teleworked but did not have flexibility in their schedule, or were otherwise unable to take on these new roles, school district officials told us that they were still working to find ways to get services to students.

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## School Districts Addressed Challenges of Distance Learning for Students with Disabilities by Modifying Instruction, Holding IEP Meetings Virtually, and Encouraging Collaboration

School district officials we spoke with noted success addressing some challenges to providing distance learning to students with disabilities by modifying goals and instruction, meeting with parents virtually, and encouraging teacher collaboration. In some cases, new procedures put into place during COVID-19 may help inform planning for future closures.

### Modifying Goals and Instruction

Officials we interviewed from all four districts and representatives of professional organizations told us that some school districts modified students' goals and services to account for the limitations of distance learning. In some cases, districts formalized these adjustments by adding temporary distance learning plans to students' IEPs.<sup>27</sup> Based on our review of 15 districts' distance learning plans, eight of the 15 explicitly noted in their plans that the goals and activities of existing IEPs would be modified with manageable goals, given the logistics of the new learning environment. Officials from two districts told us that general education and special education teachers worked together to modify students' assignments. For example, to accommodate shorter school days in one district, a general education teacher reduced the number of math problems assigned to a student so the student would have more time to work with a special education teacher on IEP goals. Officials added that such collaborative approaches could help teachers identify and more quickly accommodate both general and special education needs of students during any future closures. In contrast to modifying students' IEPs, some school districts left existing IEPs in place and instructed

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<sup>27</sup>A distance learning plan must be consistent with and support the delivery of special education and related services under IDEA. Education guidance from March 12, 2020 stated "IEP teams may, but are not required to, include distance learning plans in a child's IEP that could be triggered and implemented during a selective closure due to a COVID-19 outbreak. 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." Department of Education, Office of Special Education and Rehabilitative Services and Office of Special Education Programs, *Questions And Answers On Providing Services To Children With Disabilities During The Coronavirus Disease 2019 Outbreak* (Washington, D.C.: Mar. 12, 2020).

teachers and providers to make good faith efforts to deliver services and meet pre-existing goals, according to representatives of associations of school administrators.

At the same time, officials from all four school districts as well as some researchers told us that some students with disabilities thrived in the virtual environment. For example, an official from one district said some students, such as those with social anxiety and other mental health conditions, were better able to focus outside a classroom. Officials from several school districts told us that future special education and service delivery may include additional elements of virtual learning.

### Virtual IEP meetings

Some districts addressed the logistical challenges of holding IEP meetings during distance learning by meeting either by phone or video conference, according to officials from three of the four selected districts and our review of district plans. Under IDEA, school districts are required to ensure that the IEP team meets at least once a year to review the IEP and make any appropriate changes.<sup>28</sup> Several school district officials said that holding these meetings virtually worked well and the virtual meetings were more efficient than in-person meetings. One district official told us that several parents had commented on the increased flexibility provided by being able to participate in the meeting from their home or office. Another official told us about a parent who had previously needed to take off a half day of work to attend in-person IEP meetings, only needed to take less than an hour of leave for a virtual IEP meeting. Another parent noted both parents could participate in the conference if virtual, but might not have been able to do so in person due to scheduling conflicts and travel time, according to another district official.

Officials from two districts told us they are considering using virtual IEP meetings after they fully return to in-person education and would most certainly use them as warranted during any future school building closures. Specifically, officials from one of those districts reported that virtual IEP meetings worked better than they expected, according to surveys the district conducted of parents of students with disabilities. They now expect that virtual IEP meetings are the way of the future. They also noted that this has been a catalyst to look at education in a different

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<sup>28</sup>Under IDEA, meetings of the IEP team may occur through alternative means, such as videoconferencing and conference telephone calls, subject to the agreement of the parent and the public agency.

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way—to figure out who will benefit from doing this virtually, and to give families these options.

### Increased Parent and Teacher Collaboration

In addition to participating in IEP meetings virtually, some parents were also able to take on additional roles and fill in as their child's aide or therapist. Officials from several school districts and representatives from several national associations of service providers told us that many parents were remotely trained to help provide services, such as speech therapy and occupational therapy, to their children during distance learning. Providers would observe and give feedback to parents on how to aid students and to the students on their performance. For example, a speech therapist may instruct a parent on how much hinting or leading they provide when helping their child identify a word on the page and aid the student in mouth motions and pronunciation during virtual sessions. In another example, we heard from officials in one school district that they had delivered to students' homes the specialized equipment used for physical or occupational therapy at school. The therapists were able to remotely train parents how to use the equipment and provide the needed supports to their children. Representatives from two advocacy groups told us that it is beneficial to have family engagement, but that providing students with the services they need remains an ongoing challenge.

Researchers from professional organizations as well as officials we interviewed from all four selected school districts said that increased collaboration among educators was critical to delivering quality education that met students' needs while trying to minimize the stress on students, parents, caregivers, and teachers. An official from one district told us that without such collaboration, students initially received duplicative and excessive workloads from both their general education and special education teachers. The students and their parents were overwhelmed. As a result of these experiences, the district enhanced expectations around coordination for its general and special education teachers.

According to officials from two school districts and representatives of national organizations of educators and school administrators, increased collaboration also resulted in increased awareness between teachers. For example, officials from two of the school districts said that general education teachers were enlightened by seeing how much the special education department does for its students. One of the officials told us that this insightfulness is an opening for better communication and increased appreciation of special education.



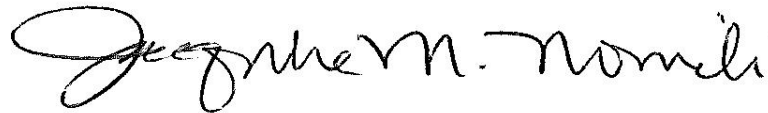
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## Agency Comments and Third Party Views

We provided a draft of this report to the Department of Education (Education) for review and comment. Education provided technical comments, which we incorporated as appropriate. We also provided selected draft excerpts to relevant officials we interviewed in school districts, and incorporated any comments as appropriate.

We are sending copies of this report to the appropriate congressional committees, the Secretary of Education, and other interested parties. In addition, the report is available at no charge on the GAO website at <https://www.gao.gov>.

If you or your staff have any questions about this report, please contact me at (617) 788-0580 or [nowickij@gao.gov](mailto:nowickij@gao.gov). Contact points for our Offices of Congressional Relations and Public Affairs may be found on the last page of this report. GAO staff who made key contributions to this report are listed in appendix III.



Jacqueline M. Nowicki,  
Director, Education, Workforce,  
and Income Security Issues

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# Appendix I: Organizations Interviewed

## Organizations that advocate for students

- The Council of Parent Attorneys and Advocates, Inc. (COPAA)
- National Disability Rights Network (NDRN)
- National Center for Learning Disabilities (NCLD)
- The Education Trust

## Associations of educators, school administrators, or special education administrators

- Chiefs for Change
- National Association of State Directors of Special Education (NASDSE)
- Council of Administrators of Special Education (CASE)
- Council of the Great City Schools
- The School Superintendents Association (AASA)
- National Association of English Learner Program Administrators (NAELPA)
- National Education Association

## Technical assistance centers supported by Education

- Mid-Atlantic Equity Consortium (MAEC)
- National Center for Systemic Improvement (NCSI)
- Midwest and Plains Equity Assistance Center (MAP)

## Professional associations of service providers

- National Association of School Psychologists (NASP)
- American Speech-Language-Hearing Association (ASHA)
- American Occupational Therapy Association (AOTA)

## Research organizations

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**Appendix I: Organizations Interviewed**

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- Center on Reinventing Public Education (CRPE)
  - The Brookings Institution
  - Center on Online Learning and Students with Disabilities (COLSD)
  - Education Week Research Center

## Appendix II: School District Selection

To understand how some school districts served English learners and students with disabilities during COVID-19 related school closures in the spring of 2019-2020 school year, we reviewed distance learning plans from a nongeneralizable selection of 15 school districts. The school districts were in California, Colorado, Florida, Illinois, Maine, Maryland, Missouri, New Hampshire, Texas, Utah, and Vermont. We use the term distance learning plans to describe materials that explain how school districts provided education during distance learning. For example, distance learning plans may describe the delivery of general education, special education, and other school-based programs. They may also include information about education materials, including those adapted to meet individual student needs; the delivery of specialized services such as physical therapy, occupational therapy, and emotional and behavior management; and guidance to special education teachers and paraprofessionals or letters to parents.

We selected the 15 districts for their high proportion of either English learners or students with disabilities. We also considered recommendations from interviewees and settings with a variety of population densities. See table 1 for characteristics of the 15 school districts.

Appendix II: School District Selection

**Table 1: Characteristics of the 15 Selected School Districts**

<b>Number of Students</b>	<b>Percent of students who are English learners</b>	<b>Percent of students who are students with disabilities</b>	<b>Population Density</b>
147	na	36.7	Rural
435	na	44.1	Rural
2,330	1.2	17.3	Town
2,338 <sup>a</sup>	0.4	13.6	Rural
2,844	7.8	7	Rural
3,980 <sup>a</sup>	na	14.6	Suburban
6,238	68.4	7.3	Rural
10,184	66.4	10.1	Rural
15,345	22.8	12.6	City
66,767	21.8	11.8	Suburban
84,646	5.8	na	Suburban
132,657	20.1	11.4	Suburban
270,978 <sup>a</sup>	11.7	13.7	Suburban
359,476	18.2	14.2	City
495,255 <sup>a</sup>	20.6	14.6	City

Source: GAO analysis of the Department of Education's Common Core of Data. | GAO-21-43

Note: [ - ] indicates that the data are missing.

<sup>a</sup>We conducted semi-structured interviews with these four districts, which were chosen based on their detailed plans for distance learning for either English learners or students with disabilities.

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# Appendix III: GAO Contacts and Staff Acknowledgments

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## GAO Contact

Jacqueline M. Nowicki at (617) 788-0580 or [nowickij@gao.gov](mailto:nowickij@gao.gov)

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## Staff Acknowledgments

In addition to the contact named above, Bill Keller (Assistant Director), Melinda Bowman (Analyst-in-Charge), Melissa Jaynes, and Alexandra Squitieri made key contributions to this report. Elizabeth Calderon, Serena Lo, Corinna Nicolaou, Liam O’Laughlin, Ronni Schwartz, and Curtia Taylor provided additional support.



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# Appendix IV: Accessible Data

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## Data Tables

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### Accessible Data for Delivery of K-12 Special Education Services before and after School Buildings Closed to Prevent Spread of COVID-19 in Spring 2020

Before school building closure

- Child in school building interacting with teachers

After school building closure

- Child in home interacting with teachers through computer

Source: GAO analysis of interviews. | GAO-21-43

**Accessible Data for Figure 1: Examples of Related Services that Some Students with Individualized Education Programs May Receive in Addition to General and Special Education**

**Individualized Education Program**

- Special Education
- General Education
- Related Services
  - Transportation
  - Speech-language pathology and audiology services
  - Interpreting services
  - Psychological services
  - Physical and occupational therapy
  - Recreation, including therapeutic recreation
  - Social work services
  - School nurse services

Source: GAO analysis of the Individuals with Disabilities Education Act (IDEA) 20 U.S.C. § 1401(26).  
| GAO-21-43

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