June 12, 2020

NJASP Updated Guidance on Evaluation

In April, the New Jersey Association of School Psychologists (NJASP) released a statement related to “Virtual Service Delivery in Response to Covid-19 Disruptions,” with respect to the COVID-19 pandemic. Even with the recent lifting of some restrictions, we continue to appreciate that we are all living and working under extraordinary circumstances. The physical and psychological well-being of students, families, and educators continues to be our immediate and overriding priority. We recognize that potential changes in our practices reflect an adaption to current circumstances; they may not represent ongoing practices when school reopens. However, this experience has also provided time for reflection and an opportunity to incorporate some new ideas into our future work. As we approach the end of the school year, we are providing updated guidance for evaluations, as well as suggestions for planning ahead in the event of a future shut-down.

Executive Summary:

- The health and safety of students, families, and school staff must be the first priority when considering the delivery of services. School districts should adhere to standards released by infection control experts (e.g., NJ Department of Health CDC guidance). Services (including evaluations and the provision of related services) which require face-to-face interaction should not be conducted during times when there is a substantial risk of contagion, as this practice places the health of the student, family, and practitioner at risk.

- When “stay at home” restrictions are relaxed, school psychologists and other CST members will need clear and specific guidelines, consistent with NJDOH and CDC parameters, in order to ensure the safety of school staff and students. In the event of in-person services (assessment or related services), PPE should be provided for the practitioner, with appropriate screening protocols in place for staff, students, and parents. Supplemental custodial services are recommended in order to sanitize in between appointments and at the end of the day.

- If the evaluation or reevaluation does not require in-person standardized testing or a general education classroom observation, it may be completed while the school building is closed and/or when there is a safety concern, with parent consent, and in accordance with NJDOE
6A:14-3.4. Rating scales, interviews, possibly curriculum-based measures, and even formal observation assessment where the child’s “natural” environment is the home, could be conducted remotely, with appropriate planning, training, and technology requirements. It is important to remember that students’ behavior during the time of school closure may not be typical for that student. This will reduce the utility of those assessments, particularly when planning interventions which may eventually be delivered when school resumes.

- The preponderance of standardized tests, such as cognitive assessment, or formal achievement tests, are not designed to be administered virtually (Hiromoto, 2020). Standardized assessments must be administered in the manner in which they were developed and validated. Deviations from standardization can invalidate test results; such invalidation could potentially impact eligibility determinations. Some students who may not need services could be found eligible; students who need services could be found ineligible.

- We reiterate our strong concerns regarding virtual administration of standardized tests and/or other instruments during the current closure. In our previous document, we stated, “NJASP opposes the remote administration (in students’ homes with parent proctors) of cognitive assessments and other diagnostic tests for which there is insufficient published, peer reviewed evidence documenting equivalence to the face to face administration format.”

- However, hopefully learning from this experience, school districts are wise to deliberate and plan for another extended school closure. Looking forward, the new reality may necessitate adapting assessment practices in those situations where pausing the assessment is not in the best interest of the student. There is general agreement among related professional fields, that most tele-assessment services are to be held to the gold standard of an in-person, one-on-one setting, with multiple guidelines to ensure professionalism.

- If an IEP team concludes that an evaluation is essential during a future school closure because, 1. it is in the best interest of the student, i.e., the student may not have access to critical services necessary without it, and, 2. standardized testing is needed for the evaluation, then before commencing remote testing, IEP teams should consider all pertinent considerations, and pause testing if all the factors cannot be addressed. A list of considerations, related to the test choice, technology, individual student and environment, appropriate training of evaluators and proctors, and evaluator experience and competence in virtual tele-assessment, is provided in this document. The standard must be high in order to minimize as much error as possible. All adaptations and potential threats to reliability and validity should be thoroughly documented in the assessment report.

- Although typically NJ school psychologists spend a good portion of their time completing assessments, we possess the training and expertise to support students, families, teachers, and all school staff in other meaningful ways. During the pandemic, and moving forward, there are opportunities for school psychologists to utilize their expertise in the ten domains of school psychology practice, in support of positive student outcomes.
• If testing needs to be paused during a closure, parents should be notified; the team should develop a plan and a timeline to complete evaluations when it is safe to do so. Upon return to school, while in-person assessment is in process, Tier 2 and Tier 3 interventions should be implemented without delay. “Waiting for the testing to get done” is not justification for waiting to provide support to vulnerable students. Please see Considerations for Academic Screening Upon Return to School.

NJASP provides additional guidance and clarification in order to help districts make informed decisions with regard to evaluations.

Evaluations should not take place if they cannot be completed safely, ethically and legally.

NJASP’s recent statement regarding virtual assessment is clear in raising concerns regarding the use of procedures that require face-to-face testing with students. We remain adamant that evaluations should not take place if they cannot be completed safely, ethically, and legally. Consistent with federal and state guidance, evaluations, initial or re-evaluation, which require in-person testing and/or observations should be postponed until school reopens. Further, NJASP opposes the remote administration (in students’ homes with parent proctors) of cognitive assessments and other standardized diagnostic tests for which there is insufficient published, peer reviewed evidence documenting equivalence to the face-to-face administration format. Deviations from standardization invalidates the test results, potentially impacting eligibility decision-making. Finally, in all decision making at this time, we need to remain sensitive to the extraordinary circumstances and hardships faced by many of our families. Although academics may have been the presenting referral concern for a student prior to the school closures, now there may be profound social-emotional needs that must first be addressed in order to help the child feel safe and ready to learn.

However, this guidance should not be interpreted to indicate that no assessment of students can occur under our current circumstances.

In fact, our previous statement offered guidance regarding what can be done during this closure.

First and foremost, with careful deliberation, the decision as to what assessment procedures are needed should be made individually for each child, based on the unique circumstances, specific needs, and suspected disability(ies). As we stated in our previous paper, there may be situations where you can complete an assessment without in-person standardized testing, but you should not do so due to the particular, individual circumstances. Additionally, depending on the suspected disability, it may not be possible to make informed decisions without in-person standardized testing. However, guidance is provided for those situations where it is feasible, as well as ethical, legal, and professional, to proceed.
What assessments can we complete? What instruments should we use? How do we plan ahead for the possibility of a future extended school closure?

- Some reevaluation decisions can be made based on data available prior to the school’s closure. The review of existing data which is conducted to determine the “nature and scope of the reevaluation” should be just as thorough as it would be if the school building were open. If the student’s goals are specific and measurable, and progress is monitored with integrity and fidelity, teams are more likely to possess sufficient evidence to support the continued need (or not) for special education services without further 1:1 testing for individual students.

- The current pandemic underscores the importance of a strong MTSS framework - ongoing data collection, development and implementation of evidence-based interventions, and progress monitoring - as essential when school is in session so as to better inform our actions should school be closed suddenly. In doing so, we possess a broader base of data, drawing not only from available “traditional” assessment information, but from multiple sources, providing a framework of evidence that we may use to make decisions with better fidelity and integrity.

- If the evaluation or reevaluation does not require in-person standardized testing or a general education classroom observation, it may be completed while the school building is closed, with parent consent, and in accordance with NJDOE 6A:14-3.4. Rating scales, interviews, possibly curriculum-based measures, and even formal observation assessment where the child’s “natural” environment is the home, could be conducted remotely, with appropriate planning, training, and technology requirements. It is important to remember that students’ behavior during the time of school closure may not be typical for that student, which will reduce the utility of those assessments, particularly when planning interventions that may eventually be delivered when school resumes. Possible threats to the validity of the evaluation should be reported. Information gathered prior to the school closure should be considered, with the understanding that the child’s functioning upon return to school may be different, necessitating reconsideration and/or re-collection of data.

Adaptive behavior can be assessed via informal and formal assessment strategies, (e.g., Vineland-3, ABAS-3), structured interviews, questionnaire, etc. A preponderance of standardized rating scales can be completed remotely by parents, teachers and students in order to assess behavior and social emotional function (e.g., BASC-3, SSIS-SEL, Conners CBS, BRIEF-2). Preschool evaluations may also include the areas and instruments previously noted, review of data from recent assessments (e.g., BDI-3), as well as ecologically-based and/or play assessment via video, with specific caveats and caution to follow.

- Rating Scales:

  Ideally, a web-based link should be sent to the parent and/or teacher to complete the rating scale online, as opposed to mailing a copy of the scale to the respondent with instructions to mail it back to the evaluator. This will minimize concerns regarding assessment tool security, getting the scale back from the parent in a timely manner, and
the logistical issues involved in sending and receiving the scale via mail while the state is on a “stay at home” order. Additionally, there are privacy concerns for school psychologists should they need to use their home address for the “self-addressed stamped envelope.” School districts that rely on paper-and-pencil rating scales are advised to consider the purchase of online administration and scoring programs, which are available from most test publishers, now rather than later, in planning for future school closures.

- **Observations:**

  A “minimum of one structured observation by one evaluator in other than the testing session” is required for an initial evaluation. Not only is the observation required; observations add a critical dimension to the evaluation process, particularly when used with other assessment data, such as rating scales, review of records, and/or standardized tests. Structured observations may even be a primary source of data when the suspected disability involves behavioral, social, and/or emotional concerns. Additionally, in certain circumstances, a formal observation-based assessment is more developmentally appropriate than standardized testing.

  - **Specific Learning Disability**

    “In the case of a student suspected of having a specific learning disability...observe the student's academic performance in the general education classroom.” {N.J.A.C. 6A: 14-3.4(f)4i(1)} A comprehensive and individualized evaluation requires direct classroom-based observation of these children in their typical learning environments, in order to document their academic performance and behavior in areas of difficulty. Observing a student in a virtual classroom, when it is not the “normal” learning environment, could not be defended as reliable and valid with regard to the required functional assessment of academic performance. Relying on a virtual observation when evaluating a student suspected of having a specific learning disability is not recommended; such an observation is fraught with professional, ethical, and legal concerns. In planning ahead, as much as possible, CSTs are advised to schedule at least one structured observation as early as possible in the evaluation process, in case there is an unexpected and prolonged school closure.

  - **Preschool**

    At the time the previous paper was released, the NJDOE was in the process of issuing guidance regarding the impact of school closure on children transitioning from Early Intervention to “Preschool child with a disability.” However, the April 2020 NJASP paper did not address specific concerns related to preschool. We are therefore providing some clarification below, specifically in terms of conducting observations within the home setting. We recognize that compared with school-aged special education support and related services, provision of preschool level service(s) can be a very different entity. This applies to assessment methods, environment and context, and, often, a heightened sense of urgency. Although true for all children, but especially
for our youngest, development does not slow down just because of a pandemic.

With regard to the required structured observation at the preschool level, at least one CST member is required to conduct a structured observation in a setting other than the testing situation, “in an environment appropriate for a child of that age” {N.J.A.C. 6A: 14-3.4(f)4i(2)}. This observation may occur in a school setting but often takes place in the home or an informal play setting. Often this is the most “natural” place to observe a child. Additionally, school psychologists may use formal observation to more directly assess learning in a developmentally appropriate way, especially when standardized testing is not advised, even if school were to be in session. Play assessment is recognized as an appropriate approach for evaluating the needs of young children (Kelly-Vance & Ryalls, 2014), especially when standard coding and/or observation protocol are followed. Therefore, if pausing a preschool evaluation is not in the student’s best interests, i.e., the child would not receive appropriate services and support at a time when early intervention is critical, ecologically-based and/or play assessment via video could be considered an authentic assessment, with the following caveats:

- Use an observation assessment instrument that was developed and validated to formally assess a preschool child’s developmental level.
- Critically evaluate and document all potential threats to the reliability and validity related to the virtual observation.
- Gather a preponderance of alternate data, from multiple sources, in order to integrate with the observational data.
- Recognize that, compared with in-person, “extra” observation may be needed in order to better ensure the reliability of the information.
- Ensure that the evaluator has the training and competency to conduct a formal observation-based assessment. A remote assessment should not be completed by a school psychologist or other team member who is not already competent in conducting that particular assessment in person.
- Ensure that the necessary technology/hardware is available and reliable on both sides of the observation(s). Plan ahead of time so all that is required is available. Use the same or equivalent technology and hardware for each individual Observation Assessment, in order to help reduce error.
- Be especially cognizant that not all families have the technological resources required; if not, school districts should be prepared to provide this. Districts are advised to plan in advance in anticipation of future closures.
- Consider cultural, linguistic, and environmental issues when conducting any home-based observation.
- Virtual Play or other virtual observation-based assessment is not meant to supplant standard practice when the evaluator is able to observe in person.
Remote Testing Guidance

We reiterate our significant concerns about conducting remote testing during the current school closure. In our previous document, we stated that “NJASP opposes the remote administration (in students’ homes, with parent proctors) of cognitive assessments and other diagnostic tests for which there is insufficient published, peer reviewed evidence documenting equivalence to the face-to-face administration format. The instruments used by school psychologists (cognitive assessments, processing tests, neuropsychological tests, achievement tests, etc.), have not been normed or validated to be used under these conditions.”

We stand by this statement under the current pandemic, where not only are children, families, and school staff facing unprecedented challenges, but we were relatively unprepared for it all. We assert that now is not the time to “give virtual testing a try,” when pressured and ill-prepared to do so. There is a greater likelihood of either Type 1 or Type 2 error (“eligible” when student is not; or “do not qualify” when student may), given that there has not been adequate time to research and evaluate the tests and platforms, train staff, gather and/or purchase the required technology and hardware, train proctors (and the potential problems inherent in using parents as proctors), etc. Whenever you apply adaptations to a test, you increase the potential of “error.” School psychologists are ethically obliged to minimize error as much as is possible, in order to obtain reliable and valid results. School psychologists should not conduct virtual remote testing until all planning, preparation and procedures are in place, in order to minimize potential error by applying rigorous standards. The reader is referred to Conducting Psychoeducational Assessments During the COVID-19 Crisis: the Danger of Good Intentions which cautions school psychologists to be wary of the danger of “good intentions” during uncertain times. This recently published paper (June 2020) covers the topics of training and access to resources, the evidentiary status of remote assessment, and legal, ethical, and scope of practice issues.

Hopefully learning from this experience, school districts will discuss how to better prepare the manner of delivering special education services, including evaluations when necessary, so students are not denied critical services. Looking forward, the new reality may necessitate adapting assessment practices in those situations where pausing the assessment is not in the best interest of the student. All decisions must be student centered; not driven by convenience or “routine”. There is general agreement among related professional fields, that most tele-assessment services must be held to the gold standard of an in-person, one-one-one setting, with multiple guidelines to ensure professionalism. However, this has not been standard practice in New Jersey. School districts are generally unprepared to conduct remote assessments in a reliable and valid manner, especially under the limits imposed by the COVID-19 crisis.

In rapid response to school closures, some test companies have been quick to promote assessments as adaptable to remote administration, without evidence of prior research related to administering those tests in that manner. Companies with a history of virtual tele-assessment have naturally increased the promotion of their virtual platform for administering specific cognitive and academic assessments. Other companies are promoting tests which are purported to be statistically
equivalent paper vs digital administration via a specific assessment platform. However, as data-based decision makers, school psychologists need to say “show me the data” before adopting a particular test or practice. Certainly, the current crisis is apt to spark more research on virtual tele-assessment. As the need for reliable and valid tele-assessment tests increases, school psychologists are advised to be effective consumers of research, using their knowledge of statistics and tests and measurement, in order to evaluate test company claims.

The following guidance, based on recommendations from the National Association of School Psychologists (NASP) and the American Psychological Association (APA), is provided to help inform districts when planning and preparing for extended school closures, in consideration of remote administration of standardized tests. Consumers are advised to hold tele-assessment to the highest gold standard, and to carefully consider all principles, considerations, and relevant questions presented below.

General Principles and Considerations

- Consider pausing standardized assessments until in-person work is possible again.
- Remote testing is not meant to supplant standard practice when you are able to implement standard practice.
- Maintain the same ethical and professional standards of care as traditional psychological assessment.
- Prior to considering virtual assessment, first determine if it is essential to complete this evaluation during this time. Is the evaluation essential, i.e., is the student unable to receive critical services without a full CST evaluation which would determine whether or not he or she is eligible for special education and related services? Can the student access needed services via Tier 2 and/or Tier 3 intervention without completing the evaluation during the closure?
- Provide parent(s) with an easily understood informed consent document outlining the process and limitations of remote assessment.
Questions to ask before remote testing:

Before testing remotely using standardized tests, IEP teams should consider each question carefully, then pause testing if questions can not be confidently answered in the affirmative.

**Test Considerations**
- Is *standardized* testing essential? Must you have those “test scores” in order to make an informed decision? Are there alternate data sources which might give you the information you need?
- Has the test been developed and validated for remote administration?
- Is there high quality evidence that adaptations produce results which are similarly reliable and valid as in face-to-face administration? (Keep in mind that equivalency studies are promising but scant, and were conducted in “controlled” circumstances, i.e., not in a child’s home under the current circumstances.)
- Is the test culturally fair and linguistically appropriate? (Children from diverse cultural, linguistic or economic backgrounds may be more impacted by deviations from standard practice. Research indicates disparities with regard to home WiFi)
- Can the integrity and security of the test material be maintained as much as possible? Does the school district have a procedure for determining how to best maintain the integrity and security of test materials and for sharing and storing data?

**Technology Considerations**
- Has the district ensured the availability of high quality technology for both evaluator and student? Do the evaluator and the student have access to the hardware required and to reliable, high speed internet connections? (Technology requirements are far more demanding than a student having a chromebook.)
- Can the test be administered remotely on (a) platform(s) designed for that purpose using standardized technology and procedures?

**Student and Environmental Considerations:**
- Can you ensure that the family has the necessary technology (e.g., size of monitor, 2 cameras, headphones, stable wifi) on their end; if not, will the district provide that for them?
- Can the family provide a quiet, non-distracting and private environment for testing?
- Is the student able and/or comfortable interacting in a remote format (developmental level, social emotional and behavioral factors, energy level, etc.)?
- Will parent or other adult individual at home be able to proctor in a standard way without interfering with the process? Has training been given to the parent or other individual at home who assists the student?

**Evaluator Considerations**
- Is the evaluator practicing within the limits of his or her own competence in deciding if he or
she can ethically engage in tele-assessment?

- Does the evaluator possess the technological competence required to administer a remote assessment?
- Has the evaluator received training in administration of the remote assessment?
- Has the evaluator practiced with the remote assessment platform?
- Does the evaluator possess the knowledge of psychometrics necessary to conduct remote assessment with integrity?
- Has the evaluator received training in interpreting and reporting the results of the remote assessment, including psychometric expertise and documenting how standardized procedures were altered and how this may have (likely) affected the results.
- Has the evaluator gathered a preponderance of alternate data, from multiple sources, in order to critically review the reliability and validity of the obtained remote testing scores?

“Takeaways” re: Virtual tele-assessment

If pausing will not adversely affect students in need, pause assessment, until it is safe to resume in-person testing.

However, if standardized testing as part of the evaluation is deemed essential; after a rigorous examination of all relevant variables as discussed above; the school psychologist can conduct the evaluation with integrity and fidelity; the evaluator has a preponderance of alternate data from multiple sources, including direct and indirect sources available to the school-based practitioner; then, a team may choose to proceed with a virtual assessment. If the choice is to test, document each and every adaptation and interpret the results with extreme caution.

Caveat: IEP teams should be extremely cautious in their review of virtual assessments from outside providers during closures. Any reports received should be rigorously examined using the considerations and questions posed for school-based practitioners, in order to reasonably ascertain whether the evaluator adhered to best tele-assessment principles and practices. Unique to the “outside” evaluation, the alternative school-based data needed in order to increase confidence in the validity of obtained test scores is less likely to be included. This could be related to difficulties accessing critical school data during a closure or related to a lack of due diligence on the part of the outside evaluator.

Final Thoughts....

Opportunities to help students thrive

NJASP recognizes the significant impact that mandatory school closures have had on the learning and well-being of all children, and the various ways districts have transitioned to remote learning and teletherapy. Although school psychology services are not taking place in brick-and-mortar buildings, it is clear that our services remain critical to helping students access appropriate educational
and mental health supports. Just as our teacher colleagues have adjusted to new ways to help students learn, school psychologists have found alternative ways to help students thrive. Although this pandemic has disrupted the work of school psychologists, it has not prevented us from supporting students with learning, social, emotional, and behavioral needs.

Although typically NJ school psychologists spend a good portion of their time completing assessments, we possess the training and expertise to support students, families, teachers and school staff in other meaningful ways. Currently, many school psychologists are supporting SEL and student mental health via the provision of remote counseling and consultative services. Additionally, school psychologists continue to support students and staff via consultation with school staff and parents, virtual I&RS/NJTSS and problem-solving meetings, community and family partnerships, remote crisis intervention, self-study and professional development for staff, dissemination of self-care resources for staff and families, conducting IEP Annual Review and Eligibility meetings, completing assessments not requiring in-person testing, and collaboration on system-wide interventions, including plans for school reentry and trauma response. During this pandemic, and moving forward, there are opportunities for school psychologists to utilize their expertise in the ten domains of school psychology practice in support of positive student outcomes.

While we recognize that assessment continues to be an essential activity for school psychologists, our skills extend beyond the test kit. School psychologists’ data-based decision making competencies extend beyond the IEP table, and are often under-utilized in the I&RS/NJTSS process. The current pandemic underscores the importance of ongoing data collection, development and implementation of evidence-based interventions, and progress monitoring, as essential when school is in session so as to better inform our actions should school be closed suddenly. In doing so, we possess a broader base of data, drawing not only from available “traditional” assessment information, but from multiple sources, providing a framework of evidence that we may use to make decisions with better fidelity and integrity. Within our current circumstances, school psychologists are advised to consider existing data assessment that was collected prior to the closure. This may include review of records and/or interventions, classroom observations, curriculum-based measures, testing, etc. These are essential aspects of continuing remote collaborative problem-solving in order to develop Tier 2 and/or Tier 3 interventions that may be adapted to distance learning. Although the team may not have all the information required in order to make eligibility decisions, school psychologists’ data and expertise will be helpful, in consultation with teachers and parents/guardians, as they partner in the remote learning process and move forward to when in-person learning can be resumed.
Resources:

APA Guidance on psychological tele-assessment during the COVID-19 crisis

Conducting Psychoeducational Assessments During the COVID-19 Crisis: the Danger of Good Intentions

Considerations for Delivery of School Psychological Telehealth Services


NASP Position Paper: School Psychologists' Involvement in Assessment

Virtual Service Delivery in Response to COVID-19 Disruptions

Telehealth: Virtual Service Delivery Updated Recommendations

Virtual Service Delivery in Response to COVID-19 Disruptions

Contact: Email NJASP

Please visit: New Jersey Association of School Psychologists