MARYLAND STATE DEPARTMENT OF EDUCATION
EQUITY AND EXCELLENCE

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Providing Continuity of Learning to Deaf, Hard-of-Hearing, Blind, Low-Vision, and DeafBlind Students during COVID-19

The purpose of this document is to provide guidance to support the continuity of learning for Blind, Low Vision, Deaf, Hard-of-Hearing, or DeafBlind students in a virtual and/or distance learning environment during the extended school closures due to the COVID-19 pandemic. This TAB includes:

- Legal Drivers
- General Considerations
- Instructional Formats
- Special Considerations
- Frequently Asked Questions
- Resources

This document is a supplement to Technical Assistance Bulletin (TAB) #20-01, *Serving Children with Disabilities under IDEA during school closures due to the COVID-19 Pandemic* and TAB #20-03, *Providing Continuity of Learning to Students with Disabilities during COVID-19.* Please refer to these TABs for additional information and guidance on the provision of special education services to students with disabilities during this unprecedented time.

Legal Drivers

In addition to the general FAPE requirements for all students with disabilities, the law provides additional requirements for Blind, Low Vision, Deaf, Hard-of-Hearing, or Deaf-Blind students.[1] Under COMAR 13A.05.01.08(6)(a), unless determined inappropriate, the IEP team must provide for Blind or Visually Impaired Students instruction in braille and the use of braille (including textbooks in braille), as well as instruction in orientation and mobility. ''Orientation and Mobility Services'' are services provided by qualified personnel to enable students to attain systematic orientation to and safe movement within their environments in school, home, and community. For more information, please refer to Technical Assistance Bulletin #18-03, *Orientation and Mobility Assessment Guidelines*.

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[1] The rights of students with disabilities to Free and Appropriate Public Education (FAPE) remain in effect during the public health emergency. This means that all applicable federal and state laws and regulations remain in effect, including those specific to serving students with low incidence disabilities.
https://www2.ed.gov/policy/speced/guid/idea/memosdcltrs/doe-doj-eff-comm-faqs.pdf

Furthermore, COMAR 13A.05.01.08(7) requires the IEP to consider for deaf or hard of hearing students (1) the language and communication needs of the student; (2) opportunities for direct communication with peers and professional personnel in the student's language and mode of communication; and (3) the academic level and full range of needs, including opportunities for direct instruction in the student's language and mode of communication.[2]

To meet these requirements and provide blind or low vision, Deaf or hard-of-hearing, or DeafBlind students with equitable access to learning opportunities, a proactive and highly collaborative approach is required. This diverse group of students may face particular challenges resulting from the transition to distance learning.

As school staff amend IEPs, they must carefully consider the needs of students with low incidence disabilities, especially as it relates to literacy and communication, to ensure that students are provided with FAPE, to the maximum extent possible, in this period of extended school closures.

General Considerations

The terms "blind and low vision," "Deaf and hard-of-hearing," and "DeafBlind" encompass students who have a wide range of access to information and instruction through vision and hearing.[3] The presence of additional disabilities further impacts access and learning for some of these students. During extended school closures, an amended Individualized Education Program (IEP), as a supplement to the student's current IEP, provides a continuity of learning for each student based upon his/her individual needs and unique circumstances and documents how special education services will be delivered in a virtual and/or distance environment. As educator(s) and families discuss the necessary amendments, multiple factors (including staffing, technology, accessibility needs, family support and ongoing progress monitoring) should be considered to address the remote delivery of the current IEP and to identify any new needs resulting from distance learning. General considerations include:

- **The Changing Role of Itinerant Teachers and Other Staff:** Many of the services provided by itinerant Teachers of the Blind and Visually Impaired (TVIs) and Teachers of the Deaf (TOD), such as direct instruction to implement IEP goals, development of adaptive materials, and pre-teaching or re-teaching of curriculum content, can continue to be provided in a remote or distance learning environment. The exact amount and nature of services to be provided is determined on an individual basis for each student through the IEP amendment process. The TVI and the TOD continue to play a critical collaborative role in working with classroom teachers, other educators, and parents to ensure the instructional materials are accessible or to determine alternative materials when needed. Other staff members, such as interpreters and paraeducators, may also have roles to play in adapting materials or providing access to instruction that should be documented in the amended IEP. It is critical to clearly define roles

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[2] While the DEI/SES is only responsible for oversight of compliance with the IDEA by local public agencies, the DEI/SES reminds the local public agencies that other federal disability laws also remain in effect, such as Section 504 of the Rehabilitation Act and Title II of the Americans with Disabilities Act. For more information about requirements under these laws, please visit the U.S. Department of Education's website.

[3] For the sake of simplicity in the document, the terms blind and Deaf are used to refer to all students whose hearing and vision impact their access to education, regardless of their level of vision or hearing, language and communication modality, or category of eligibility for special education.

and responsibilities for all staff when implementing an amended IEP within the virtual or distance environment. Consider an agreed-upon schedule (day and time) for service provider(s) communication and collaboration, including the family.

- **Use of Assistive Technology and Learning Tools during Virtual or Distance Learning:** When possible, providing students with familiar technology and materials will make access easier. When this is not possible, consult with the TVI and/or TOD, educational audiologist, assistive technology (AT) specialist and others to select other available tools and teach students (and families, if appropriate) to use them.

- **Planning for Accessibility of Instructional Materials:** When instructional materials are chosen or created to be used by an entire class or grade level across a school or system, accessibility considerations should be built into the design process. Proactive steps include incorporating captions and/or interpreting in recorded lessons, making sure documents will work with screen readers and other assistive technology, and providing options to access content. It is more efficient and effective to select or design accessible materials from the outset than to attempt to "retrofit" materials that are not accessible.

- **Need for Parent Agreement and Support:** Engaging families to discuss their child's individual needs and circumstances is a critical part of amending the IEP for this period of extended school closure. Parent understanding and agreement to implement the amended IEP is a key element. Parents may need training and support to assist their children in the use of assistive technology and other tools for accessing curriculum. Parents whose children use sign language or braille to access instruction may not be fluent themselves and may need voice over/captions, support with key vocabulary, text copies of braille materials and other alternatives, and their children may require more direct support from teachers. For students with complex support needs, providing training and modeling for parents to implement learning activities may be a way to provide instruction on IEP goals, if the family agrees. Parents who are themselves Deaf or Blind (whether or not their children receive special education) are legally entitled to effective, accessible communication with the school and to access the materials and resources being provided to all families in the system. This includes student instructional materials, so that they can support their children's learning.

- **Virtual Progress Monitoring:** Determining how student progress will be measured and documented is an essential component to amending the IEP; these data will be essential for making appropriate decisions when normal school operations resume. Educators should consider flexible and creative ways to document student learning, such as having students or parents record videos of the student performing certain skills or responding to questions in sign language.

Instructional Formats
(Modifications, Accommodations and Supplementary Aids/Services)

In reviewing the student's current IEP to determine how services will be provided during virtual and/or distance learning, educators and families consider how the student's accommodations, modifications, and supplementary aids and services will be implemented and identify any needed modifications to be documented in the amended IEP. The table below describes common instructional formats implemented for virtual and/or distance learning and how they may be made accessible for blind and Deaf students.

Instructional Format	*Considerations for Blind students*	*Considerations for Deaf students*
Print Materials (on paper or provided digitally)	● Select or create documents that meet the WCAG standards and therefore can be used with a variety of assistive technology. ● If documents cannot be made accessible, provide a reasonable alternative for the student to access, such as having the teacher or other staff member read the document aloud on a recording or over the phone. Allow students to record rather than write their answers, if needed. ● Consult with the TVI on the creation of accessible materials and to select alternatives when needed. The Maryland School for the Blind can also serve as a resource.	● For students who are unable to read grade-level text and require the human signer accommodation, the TOD or educational interpreter can send a recording of themselves signing the materials. Students can send back a video of themselves responding in sign if needed (instead of writing).
Recorded lessons and other learning materials	● Remember that the blind student cannot access purely visual information. Verbalize visual content and use specific descriptions instead of "this" or "that." ● Provide the student with a written preview of the information that will be presented in advance. ● Pre-teach visual concepts and vocabulary as needed.	● For students who use captions: select captioned videos or add captions to teacher-made materials. ● If an uncaptioned video must be used, provide a transcript. ● For students who require interpreting, use screen capture software or other platforms to add interpreting (ideally by an interpreter familiar with the student) to videos. ● Pre-teach concepts and vocabulary as needed.

| Live instruction (group or individual) | • Discuss with the student and TVI what small adaptations will support full participation, such as having participants identify themselves before speaking and describe visual content.
• As with recorded videos, provide verbal descriptions and, when possible, accessible forms of visual materials.
• Consider pre-teaching (by the TVI or classroom teacher).
• Provide support and opportunities to practice with the technology as needed. | • For students who use captions, utilize a platform that supports automatic or manual captions. (Be aware that automatic captions may not be fully accurate.)
• For signing, have the interpreter join the meeting as a participant. The student can "pin" the interpreter's window to make it large enough to see.
• Provide copies of materials, and pre- or re-teaching or other support as needed.
• Provide support and opportunities for the teacher, interpreter and student to practice with the technology.
• Be aware of acoustic issues (especially if using automatic captions) and turn-taking etiquette during a group meeting. |

Special Considerations for Blind/Low Vision Students

- **Access to braille materials.** Students who use braille as their primary reading media can access materials through several methods. If the student has or can be provided an electronic Braille display, they can use that to read electronic documents (if they are created in accessible formats), create their own documents in response to assignments, and read books from sources like Bookshare, BARD and online platforms. If the student does not have access to a braille display, the TVI can assist with the production of Braille materials (if possible) or delivery of alternative formats, such as text to speech software on a computer, audio recordings or adult assistance. Like anything else, this will have to be an individual decision for each student.

- **Orientation and mobility.** Every child with a documented visual impairment in Maryland has an orientation and mobility assessment or services (Md. Code Ann., Educ. §8-408(c)(1)). Through the amended IEP, the orientation and mobility specialist works with the student on goals implemented through distance learning, such as wayfinding technology and concept development. These sessions can take place over the telephone or using an online platform. Modifications to the delivery of services are documented within the amended IEP. If there are any goals that cannot be addressed or services that cannot be provided in the virtual or distance learning context, these are also documented in the amended IEP with an explanation of why a goal cannot be addressed.

Special Considerations for Deaf/Hard of Hearing students

For some students, opportunities to communicate in their preferred language (e.g., American Sign Language) outside of school may be very limited. Video conferencing with teachers and peers may be an important part of the plan for these students.

Special Considerations for DeafBlind Students

Students with dual sensory impairment will require a highly individualized approach to learning in this environment, just as they do in the school setting. Some students who are considered DeafBlind have some functional vision and/or hearing and may be able to access virtual instruction using an individualized combination of the accommodations and supports described above. Some students with additional cognitive, physical, or other disabilities require direct adult support to access information in their environment. Extensive and ongoing collaboration among the many professionals and close partnership with families will be needed to implement the amended IEP and identify necessary resources.

Frequently Asked Questions

Q: How can the need for assistive technology devices and services (such as Braille writers or FM systems) be addressed during virtual and/or distance learning?

A: Assistive technology needed to access educational services and activities during distance learning should be discussed during the conversation to amend the IEP for the student. In some cases, the tools and devices the student uses at school can be picked up by or delivered to the family for home use. Some students may be able to use an alternative tool (such as a downloadable screen-reading or speech-to-text software); remember to plan for instruction and support in the use of the tool. If neither of these solutions are appropriate, find another way for the student to access the content and engage in the learning activities, such as listening to an audio book or having the material read aloud over the phone.

Q: Can students receive Braille versions of learning materials remotely?

A: School system staff may be able to produce Braille materials to be picked up by families or delivered to student homes. The Maryland Instructional Resource Center (mirc@mdsclblind.org) may be able to produce materials on an as-needed basis to be delivered to students via mail or other means. Students who have electronic Braille reading devices can access books via platforms like Bookshare, BARD, etc.

Q: What is the role of sign language interpreters during virtual or distance learning?

A: If instruction is being provided through live video-conference, the interpreter can join the meeting as a participant. The teacher, interpreter, and student may need to experiment with the best way to arrange the screen view to allow access to the content and the interpretation. If recorded lessons are used, screen capture/recording software can be used to add "picture-in-picture" interpretation.

Q: Do students receive related services during virtual or distance learning?

A: Many related services, such as speech therapy, occupational therapy, and orientation and mobility services, may be provided via video- or tele-conferencing. Services should continue to the maximum extent possible. The Maryland Department of Health (MDH) has issued guidance expanding the use of telehealth, including licensing reciprocity for out-of-state providers and expanded eligibility for Medicaid billing. The amended IEP documents how services will be delivered (timing, methodology), as well as, any services that cannot be provided through virtually with an explanation.

Q: Under Statewide telehealth and Medicaid billing expansion, is Orientation and Mobility now considered a billable service?

A: No. The expansion of telehealth and Medicaid billing eligibility did not include the addition of any new billable services. The way in which existing billable services are delivered were expanded to include telehealth as referenced above.

Resources

COVID-19 Resources from the Maryland Department of Disabilities

How to Get Kids Ready to Video-Chat for Online Classes – Security and etiquette best practices for live on-line gatherings

DeafBlind

Connections Beyond Sight and Sound
CBSS is a State- and federally funded program that supports specially designed instruction to DeafBlind students in Maryland. Numerous resources, including live and recorded webinars and consultation with staff members, are available.

COVID-19 Communication Guidelines
Recommendations from the Helen Keller National Center for Deaf-Blind Youth and Adults on safe and effective communication strategies for deaf-blind people during the public health emergency.

Questions and Answers from the National Deaf Center on PostSecondary Transition
Includes strategies for accessing remote learning for DeafBlind students.

Blind and Low Vision

Screen Readers:
Non Visual Access
NVDA A free screen reader that can be downloaded on any computer.

Job Access With Speech (JAWS)
The most commonly used screen reader is offering free home downloads until June 30, 2020.

Windows Narrator
Microsoft has a built-in screen reader available for free on all Windows platforms.

Natural Reader
This Google Chrome extension is a text-to-speech reader that will read text aloud within Chrome.

Magnification Software:
Zoom Text
Zoom text is free until June 30, 2020 from Freedom Scientific.

Windows Magnifier
All windows platforms come with a built-in magnification system.

Braille Production:
[Paths to Literacy – Working Together to Support Students](#)
Request braille materials be produced and mailed to a student. This website, developed by Perkins School for the Blind, contains a variety of other resources for blind and low-vision students, including those who have multiple disabilities.

Reading Platforms for Blind and Print Disabled Students:
[Audible audio stories](#)
Free audio stories for all children.

[Braille and Audio Reading Download (BARD)](#)
Free book and other print materials for blind and print disabled individuals.

[Bookshare](#)
Free downloadable books in various formats so that people with dyslexia, blindness, cerebral palsy, and other reading barriers can customize their experience to suit their learning style and find virtually any book they need for school, work, or the joy of reading.

[Learning Ally](#)
Free audio book downloads for blind and print disabled students and adults.

[NFB Newsline](#)
A free audio news service for anyone who is blind, low-vision, deafblind, or otherwise print-disabled that offers access to more than 500 publications, emergency weather alerts, job listings, and more.

Online Learning Resources for Blind Students:
[National Homework Hotline for Blind/Low Vision Students during COVID 19](#)
TVIs from across the country are available via telephone or video conferencing to provide homework help to blind students. This includes how to navigate websites with JAWS, Nemeth and braille help, and using refreshable braille displays.

[Objective Education](#)
Online learning tools for bind and low vision students. Teachers can set up accounts and send lessons to students remotely. This tool is free now for a limited time.

[Study Braille with Lisa](#)
Accessible online learning tool with guided lessons, so students can work semi independently on braille.

[TVI and O and M Activities for HomeSchool](#)
Online information available including daily lessons via webinars with links to information and tools.

[Virtual Expanded Core Curriculum Learning](#)
Weekly video conferencing academy for students with Visual Impairments around concepts of the Expanded Core Curriculum.

Deaf and Hard of Hearing

Captioning:
How to Caption Your Videos
A comprehensive resource that explains how to caption videos using a variety of different platforms and includes a list of teaching tools that have closed captioning built in.

Adding your own captions to YouTube videos and Editing Automatic Captions in YouTube. Tools for creating closed-captioned videos in YouTube.

Accessibility and Engagement:
Remember Accessibility in the Rush to On-Line Learning
Checklist for Teaching Deaf Students Online
The National Deaf Center provides tips on accessibility in on-line learning environments. Although designed primarily for post-secondary instructors and institutions, the tips are relevant for K-12 contexts as well.

Make Online Learning Accessible for Deaf Students
Provides suggested online learning tools and strategies to support engagement of students who are deaf.

Interpretation:
Preparing Educational Interpreters for Distance Learning
Guidelines, recommendations, and resources from the National Association of Interpreters in Education, in order to help interpreters supporting distance learning for students.

Learning Materials:
Described and Captured Media Program
Free streaming of captioned and/or audio described videos on a variety of topics (requires a free membership).

Language Development:
Maryland Hearing Aid and Language and Communication Video Loan Bank
The Loan Bank website includes links to free resources to help families learn American Sign Language, Cued Speech, and/or listening and spoken language strategies.

Family Engagement Activities from the Maryland School for the Deaf (will be updated on an ongoing basis).

For more information, call 410-767-0249

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