

## Attendance Tracking for Quarantined Students – 2021-2022 School Year

On August 5, 2021, the Kentucky Board of education passed an emergency regulation change to 702 KAR 7:125 Section 1 (4). The following condition was added in order to count attendance for quarantined/isolated students during the 2021-22 school year:

- (i) For School Year 2021-2022, the pupil is in quarantine due to documented possible exposure to COVID-19 or isolation due to COVID-19 infection, in accordance with Centers for Disease Control and Kentucky Department for Public Health guidelines, and is receiving at least the minimum amount of daily instruction required pursuant to KRS 158.060

This change allows districts to count quarantined/isolated students receiving services (remotely) in average daily attendance calculations. Districts will need to **continue to code quarantined students in Quarantined COVID Exposed (QCE) and Quarantined COVID Positive (QCP) attendance groups**, but they will also need to track attendance of quarantined/isolated students using one of the following options:

- Quarantined and isolated students (quarantined due to COVID-19 exposure or isolated due to a positive COVID diagnosis) may be coded with an attendance code of **“Quarantined Receiving Services”** that is mapped to **Absent – Exempt**. District may create this code in Infinite Campus. Students so-coded, must continue to receive daily instruction remotely. This does not have to be 100% synchronous instruction but should include interaction with a teacher during the quarantine period. Subject to exceptions established in [KRS 158.060\(3\)](#), the district must provide at least the equivalent of six hours of daily instruction. For specific guidance on students with IEPs, please see the ‘Quarantine and Attendance for Students with IEPs’ section at the end of this document. Students not receiving the minimum statutorily required equivalent of 6 hours of instruction should be coded as absent – excused or unexcused.
- At the district’s discretion, students isolated due to a positive COVID diagnosis may alternatively be included in home/hospital instruction provided all requirements of [KRS 158.033](#) are met. All normal home/hospital documentations and procedures should be followed.

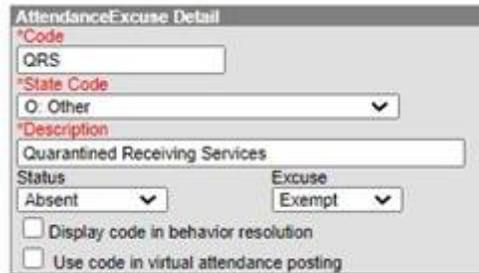
Districts may need to adjust board policies so quarantined/isolated absences do not count against the number of student absences allowed per year and activities tied to absences, such as sports, prom, perfect attendance, etc.

Districts must have a written description outlining delivery of instruction for quarantined/isolated students. The written description may provide for the same instruction as previously approved continuation of learning strategy or NTI plan. These plans should be available during attendance audits.

## Frequently Asked Questions – Setup, Coding and Instruction for Quarantined/Isolated Students

Q: Does the district create the Quarantined Receiving Services (QRS) attendance code?

A: Yes. The district will need to create the QRS attendance code to be used for quarantined/isolated students. Attendance codes are created in Infinite Campus at System Administration | Attendance | Attendance Codes. It should look like this:



The screenshot shows the 'AttendanceExcuse Detail' form. The fields are as follows:

- \*Code:** QRS
- \*State Code:** O: Other
- \*Description:** Quarantined Receiving Services
- Status:** Absent
- Excuse:** Exempt
- Display code in behavior resolution
- Use code in virtual attendance posting

Q: Will the district receive ADA/funding for quarantined/isolated students?

A: The QRS attendance code will generate ADA on the SAAR report. This will result in funding for quarantined/isolated students. Students marked with this code will receive a full day of attendance if the code is used for an entire day because the excuse code is Exempt. This code is similar to the EHO attendance code that generates attendance for students not physically present in school. A student that does not receive instruction for a full day (due to a doctor's appointment or sickness) can be coded as QRS for part of the day and receive the appropriate absence code for the remainder of the day.

Q: Can quarantined/isolated students be marked absent?

A: Yes. If a quarantined/isolated student does not engage or interact in a manner consistent with a continuation of learning plan developed by the district and communicated to the student/family, he/she should be marked absent on that day with the appropriate attendance code.

Q: Is a quarantined/isolated student marked as a No Show on the first day of school?

A: A student CAN start school with a QRS attendance code. If the school knows a student is in quarantine/isolation the student does not have to be marked as a No Show on the first day of school if he/she is not present. Instruction/services should be provided to the student on this day to use the QRS attendance code.

Q: Do districts still need to use QCE and QCP attendance groups?

A: Yes

Q: How should a student be marked in Infinite Campus when he/she is quarantined/exposed?

A: A quarantined (exposed) student should be included in the QCE attendance group for the length of the quarantine period AND receive a daily QRS (absent-exempt) attendance code for the days the student receives virtual instruction.

Q: How should a student be marked in Infinite Campus when he/she is isolated/COVID positive?

A: An isolated (COVID positive) student should be included in the QCP attendance group for the length of the isolation period. This student should then receive a daily QRS (absent-exempt) attendance code for the days the student receives virtual instruction OR be placed on home/hospital.

Q: Instead of using the QRS attendance code, can quarantined/isolated student be moved to the full-time virtual group of students?

A: No. The full-time enrolled virtual student group should be as consistent as possible. To move quarantined/isolated student in and out of that group, districts would have to adjust blended learning groups and possibly change student schedules for the quarantine/isolation period. If students remained in the same courses, teachers would be required to instruct/track both in person and virtual students.

Q: What qualifies as 6 hours of daily instruction for a quarantined/isolated student using the QRS attendance code and how does a district monitor/keep track of the daily instruction?

A: In the same general regard that districts monitor/track in-person student daily instruction, schools and districts can develop internal continuation of learning strategies appropriate for their students. This can include, but not be limited to, gauging interactions and engagement through lesson plans, pacing guides, observation, student work, and assessments. Additionally, metrics provided through synchronous and asynchronous digital tools for interactions/engagement (such as activity time in a learning management system) can be used. As part of the strategy, districts should utilize digital strategies from last school year's extended NTI period that proved effective, as well as any new blended learning strategies developed by the school or district for this year. Intentional interactions with quarantined students (either with the in-person traditionally assigned teacher or other certified staff assigned to assist with virtual instructional activities) are encouraged as part of the strategy but there is no required amount or type of specific interaction that needs to be kept track of for reporting purposes. Attendance auditors will check for written documentation outlining delivery of instruction for quarantined/isolated students during attendance audits.

Q: Must quarantined students be provided instruction by their regular classroom teacher?

A: No. Quarantined students can receive virtual instruction from a regular classroom teacher, a teacher specifically assigned to interact with quarantined students, a teacher in the school/district's full-time virtual program, or an otherwise appropriately certified teacher. If the teacher is part of the full-time virtual program, the quarantined student will not be moved into the program (included in a blended

learning group) but receive the QRS attendance code for the quarantined days while receiving instruction from the full-time virtual teacher.

Q: What documentation is required to verify a student is quarantined?

A: Contact tracing is occurring differently across the Commonwealth. In some cases, local health departments are still engaged in contact tracing and reaching out to those who may be potentially exposed for quarantine determinations. However, other health departments across the state are not providing documentation to schools for positive COVID results and they are no longer providing contact tracing. Schools can accept calls from doctor's offices or health departments as verification, or parents must provide notes verifying absences due to quarantine/isolation once the student returns to school. These notes should not count toward the number of allowed parent notes per year, as set by local board policy.

Q: How long should a school use a QRS attendance code for a quarantined/isolated student? How long does a quarantine/isolation period last?

A: KDE recommends schools and districts follow CDC and Department of Public Health guidance when determining quarantine/isolation periods. Guidance can be found at:

[CDC - Considerations for Case Investigation and Contact Tracing in K-12 Schools and Institutions of Higher Education \(IHEs\)](#)

[CDC – Quarantine and Isolation](#)

[DPH Quarantine Guidance](#)

Q: What are the guidelines for providing instruction to students with IEPs? Does a quarantine period require a change in placement?

A: The following guidance on instruction for quarantined students with an Individualized Education Program has been provided by the Office of Special Education and Early Learning (OSEEL).

### **Quarantine and Attendance for Students with IEPs**

Following the recent introduction of the newly proposed regulation shared with the Kentucky Board of Education (KBE) and the Local Superintendents' Advisory Council (LSAC) regarding district employee quarantine leave (702 KAR 1:191) and the corresponding emergency regulation (702 KAR 1:191E), as well as the recent email about virtual instruction shared by the Kentucky Department of Education's (KDE) Office of Financial Operations (OFO) to local Directors of Pupil Personnel (DPPs), the KDE's Office of Special Education and Early Learning (OSEEL) has received inquiries regarding quarantine, and the provision of a free appropriate public education (FAPE) for students with disabilities who are

quarantined or isolated. The following information is to provide clarification and guidance to local school districts for students with disabilities in relation to these issues.

For a quarantined student with an IEP to be counted in attendance, the student must be provided a full offer of FAPE. The United States Department of Education and the Office for Civil Rights have issued specific guidance regarding the provision of FAPE, and have included in that guidance when to consider a switch to virtual instruction as a change in placement that would trigger a decision by the Admissions and Release Committee (ARC). Please see below for specific guidance along with links to the full guidance documents.

### **According to the Office of Special Education Programs (OSEP)**

[OSEP Policy Letter 21-01](#) explains that determinations about whether a revision to a child's program results in a change in placement are made based on the facts and circumstances of the specific child, examining a number of factors. OSEP set out several of these factors in its Letter to Fisher, 21 IDELR 992 (July 6, 1994):

“In determining whether a “change in educational placement” has occurred, the public agency responsible for educating the child must determine whether the proposed change would substantially or materially alter the child's educational program. In making such a determination, the effect of the change in location on the following factors must be examined: whether the educational program set out in the child's IEP has been revised; whether the child will be able to be educated with nondisabled children to the same extent; whether the child will have the same opportunities to participate in nonacademic and extracurricular services; and whether the new placement option is the same option on the continuum of alternative placements.”

### **According to the U.S. Department of Education**

[Questions and Answers on Providing Services to Children with Disabilities During the Coronavirus Disease 2019 Outbreak \(March 2020\) - Individuals with Disabilities Education Act](#)

Question A-2: Must an LEA provide special education and related services to a child with a disability who is absent for an extended period of time because the child is infected with COVID-19, while the schools remain open?

“It has long been the Department's position that when a child with a disability is classified as needing homebound instruction because of a medical problem, as ordered by a physician, and is home for an extended period of time (generally more than 10 consecutive school days), an individualized education program (IEP) meeting is necessary to change the child's placement and the contents of the child's IEP, if warranted. Further, if the IEP goals will remain the same and only the time in special education will change, then the [ARC] may add an amendment to the IEP stating specifically the amount of time to be spent in special education. If a child with a disability is absent for an extended period of time because of a COVID-19 infection and the school remains open, then the [ARC] must determine whether the child is

available for instruction and could benefit from homebound services such as online or virtual instruction, instructional telephone calls, and other curriculum-based instructional activities, to the extent available. In so doing, school personnel should follow appropriate health guidelines to assess and address the risk of transmission in the provision of such services. The Department understands there may be exceptional circumstances that could affect how a particular service is provided.

If a child does not receive services after an extended period of time, a school must make an individualized determination whether and to what extent compensatory services may be needed, consistent with applicable requirements, including to make up for any skills that may have been lost.”

Question A-4: If a child with a disability at high risk of severe medical complications is excluded from school during an outbreak of COVID-19 and the child’s school remains open, is the exclusion considered a change in educational placement subject to the protections of 34 CFR §§ 300.115 and 300.116 and 34 CFR §§ 104.35 and 104.36?

“If the exclusion is a temporary emergency measure (generally 10 consecutive school days or less), the provision of services such as online or virtual instruction, instructional telephone calls, and other curriculum-based instructional activities, to the extent available, is not considered a change in placement. During this time period, a child’s parent or other [ARC] member may request an [ARC] meeting to discuss the potential need for services if the exclusion is likely to be of long duration (generally more than 10 consecutive school days). For long-term exclusions, an LEA must consider placement decisions under the IDEA’s procedural protections of 34 CFR §§ 300.115 – 300.116, regarding the continuum of alternative placements and the determination of placements.

Under 34 CFR § 300.116, a change in placement decision must be made by a group of persons, including the parents and other persons knowledgeable about the child and the placement options. If the placement group determines that the child meets established high-risk criteria and, due to safety and health concerns, the child’s needs could be met through homebound instruction, then under 34 CFR §300.503(a)(1), the public agency must issue a prior written notice proposing the change in placement. A parent who disagrees with this prior written notice retains all due process rights included in 34 CFR §§ 300.500-300.520.

For children with disabilities protected by Section 504 who are dismissed from school during an outbreak of COVID-19 because they are at high risk for health complications, compliance with the procedures described above and completion of any necessary evaluations of the child satisfy the evaluation, placement and procedural requirements of 34 CFR §§ 104.35 and 104.36. The decision to dismiss a child based on his or her high risk for medical complications must be based on the individual needs of the child and not on perceptions of the child’s needs based merely on stereotypes or generalizations regarding his or her disability.”

#### **According to the Office for Civil Rights**

[OCR Fact Sheet Coronavirus 3.13.2020 \(ed.gov\)](#) “If a student who has an individualized education program (IEP) through the Individuals with Disabilities Education Act, or is receiving services under Section 504, is required or advised to stay home by public health authorities or school officials for an extended period of time because of COVID-19, provision should be made to maintain education services. This also applies if the student is absent from school as advised by the student’s treating physician,

consistent with school policy and documentation requirements. During such absences, if the school is open and serving other students, the school must ensure that the student continues to receive a free appropriate public education (FAPE), consistent with protecting the health and safety of the student and those providing that education to the student. If feasible, the student's [ARC], or the personnel responsible for ensuring FAPE to a student for the purposes of Section 504, can be utilized to assist with the effort to determine if some, or all, of the identified services can be provided through alternate or additional methods. Accessible technology may afford students, including students with disabilities, an opportunity to have access to high-quality educational instruction during an extended school closure, especially when continuing education must be provided through distance learning."

**KDE Contacts:**

For questions regarding coding and funding please contact:

Office of Finance and Operations  
Division of District Support  
300 Sower Blvd., 4th Floor  
Frankfort, KY 40601  
(502) 564-5279

For questions regarding virtual instruction of quarantined students please contact [Marty Park](#), or [Ben Maynard](#).

Office of Education Technology  
School Digital Readiness Services  
300 Sower Blvd., 4th Floor  
Frankfort, KY 40601  
(502) 892-6328

For questions regarding students with IEPs and virtual instruction of quarantined students with IEPs, please contact:

Office of Special Education and Early Learning  
300 Sower Blvd., 5th Floor  
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