**Comprehensive Evaluation of Blind and Low Vision Students* During COVID-19:
A Guidance Document**

* This document generally adopts identity-first language (APA 7th edition, 2019) as a show of allyship with blindness communities who have expressed preferences for empowerment via identity. For more information, please view the first 30 minutes of [Dr. Siu's webinar from the American Printing House of the Blind (APH)](). New philosophies of supporting students with visual impairments are also discussed in the [2nd edition Access Technology book]() (Siu and Presley, 2020).

<u>**Purpose of This Guidance Document**</u>
The purpose of this document is to provide resources for Teachers of Blind and Visually Impaired Students (TVIs) and Certified Orientation and Mobility Specialists (COMS) during a unique time of remote and hybrid instruction. It provides a summary of the legal and ethical guidelines as mandated by California and federal orders, an overview of methods required for evaluations, and considerations for in-person and virtual assessments.

Each section of the document begins with a summary followed by more detailed information. Portions of these guidelines are excerpted from the [CA Association of School Psychologists (CASP) Resource Paper (August 15, 2020)]() and are cited accordingly. Phrases within an excerpt that were updated for our area of focus are indicated by brackets [ ]. Readers can also refer to an addendum document that provides an executive summary for ease of review.

This document asserts that although the current health crisis necessitates workarounds for assessing blind and low vision students, <u>these workarounds must not become permanent practices</u>.

The strategies offered in this document are meant as temporary solutions that do not bypass the need for conducting comprehensive evaluations that meet professional standards of excellence.

<u>**1. Need for Evaluation and Relevant State and Federal Guidelines**</u>
Section 1 summary: During the COVID-19 crisis, students with disabilities remain entitled to receive a free and appropriate public education (FAPE) in the least restrictive environment (LRE) consistent with their individualized education program (IEP). In addition, timelines for evaluation and provision of special education services remain valid and are not waived.

The entirety of this section is excerpted from the [CA Association of School Psychologists (CASP) Resource Paper.]()

Introduction

On March 13, 2020, Governor Newsom signed Executive Order (EO) N-26-20 requiring the California Department of Education (CDE) to issue guidance for Local Educational Agencies (LEAs) responding to COVID-19 issues. This included ensuring students with disabilities (SWD) receive a free appropriate public education (FAPE) consistent with their individualized education program (IEP) and meeting other procedural requirements under the Individuals with Disabilities Education Act (IDEA) and California law. Following that, many districts believed that Senate Bill 117 protected them from special education

timelines. However, the bill made clear that "it is not waiving requirements imposed by federal law." CDE has since posted frequent Special Education guidance updates for COVID-19.

Q1: What is the impact of school site closures on special education monitoring timelines and processes?

As of July 2020, the federal government has not waived the federal requirements under the IDEA [which includes Child Find 20 US Code 1412]. The CDE and State Board of Education (SBE) are working with the US Department of Education (USDOE) to determine what flexibilities or waivers may be issued in light of the extraordinary circumstances. At this time, Congress has not passed any additional waiver authority concerning the FAPE and Least Restrictive Environment (LRE) requirements of IDEA, reiterating that learning must continue for all students during the COVID-19 national emergency. USDOE continues to provide updates and Special Education guidance for COVID-19.

Given this information, [we] understand that [Teachers of Blind and Visually Impaired Students (TVIs) and Certified Orientation and Mobility Specialists (COMS) recognize that] assessments not completed during 2019-2020 school closure and regularly scheduled 2020-2021 assessments will all need to be completed whether school doors open physically or virtually. During the time of distance learning, some schools are taking the opportunity to do assessments in one-on-one settings using safety precautions determined by their given county, as allowed under EO N-33-20:

"In some exceptional situations, LEAs may need to provide certain supports and services to individual students in-person in order to maintain students' mental/physical health and safety for the purpose of supporting the student in accessing the alternative options for learning being offered (e.g. distance learning). With that said, alternative service delivery options should seek to comply with federal, state, and local health official's guidance related to physical distancing, with the goal of keeping students, teachers and service providers safe and healthy as the primary consideration." (04-09-2020)

In such cases, service providers may be considered "Essential Critical Infrastructure Workers" under EO N-33-20. "Workers supporting public and private childcare establishments, pre-K establishments, K-12 schools, colleges, and universities for purposes of distance learning, provision of school meals, or care and supervision of minors to support essential workforce across all sectors" are on this list. To review the list of "Essential Critical Infrastructure Workers", see the California Coronavirus (COVID-19) Response.

2. Methods and Purpose of Evaluation and Assessment
Section 2 summary: Remember that the purpose of an evaluation is to determine a student's needs for special education services in the current educational placement. Whether it is a physical or virtual learning environment, an evaluator's task is to determine what a student requires for equitable access to their education. As is the case with any change in educational placement, an evaluator must re-assess and update the evaluation as needed when there are major changes in the learning environment or needs of a student. During this crisis, it is critical to consider alternative ways to evaluate and assess students, even if formal testing measures cannot (and should not) be carried out.

The remainder of this section is excerpted from the CA Association of School Psychologists (CASP) Resource Paper.
As [Local Educational Agencies] (LEAs), school psychologists, [and related services personnel] grapple with determining if a student meets and/or continues to meet eligibility for special education, a clear

understanding of the legal language related to evaluation and reevaluation is helpful. Federal laws (e.g. 20US Code 1414[1]) and interpretation by the Federal Register (i.e. 34CFR 300.304) both use the term "evaluation" to describe the overriding responsibility of LEAs to determine initial and continued eligibility for special education services.

Prior to COVID-19, many LEAs, school psychologists, [and related services personnel] used the terms "evaluation", "assessment", and "testing" interchangeably in practice, even though they are related but not identical practices. In published literature, evaluation, assessment, and testing have all been described separately – indicating [that these terms are] not synonymous practices following the distinction in the law. This means that "evaluation" and "assessment" are both broader activities and that both can be conducted without "testing". [Evaluation and assessment are activities that allow an IEP team to use qualitative and/or quantitative data in order to make determinations about SPED services. Testing refers to the use of a specific instrument to collect quantitative data as part of an assessment that is used in a team evaluation process.]

This attention to the three (3) terms is not mere semantics but serves to support LEAs, school psychologists, [and related services personnel] to meet the letter and spirit of the law and to exercise best practice. Prior to COVID-19, interchanging the 3 terms was common and typically without consequence (i.e. the requirement for an evaluation typically meant a battery of tests). However, given the validity concerns with both virtual and in-person testing, it is critical to consider alternative ways to 'evaluate' children. In particular, "evaluation" and "assessment" are possible practices even if "testing" cannot and should not occur.

[1] It is beyond the scope of this paper to fully describe laws and their interpretations. Readers are encouraged to consult IDEA for detailed wording.

3. Remote Assessment Considerations
Section 3 summary: Regardless of remote or in-person assessment, data collection should always include information from all available data sources and not just from tests. Comprehensive and holistic data collection is necessary to draw defensible conclusions about a student's strengths and needs related to their disability. In remote assessment situations, an evaluator can focus on gathering data from the following sources:
- An extensive review of records (file review)
- Interviews with the IEP team, student's family, and student
- Observations in various learning environments, such as but not limited to: virtual classrooms, online learning management systems (LMSs), and activities in the home.

Remember to evaluate and assess in the spirit of best intentions; recall that the purpose of evaluation is to determine a student's needs for equitable access to their education, and to define for the student:
- A free and appropriate public education (FAPE)
- The least restrictive environment (LRE)
- An individualized educational program (IEP)

When a comprehensive evaluation (including testing in addition to evaluation and assessment) is not possible, it is critical to include a disclaimer statement in the evaluation report that describes:
- A statement that the reported data do not comprise a comprehensive evaluation;
- How data were gathered; including when data were collected through remote video and/or with the assistance of an untrained volunteer;

- Student affect during assessment as some children are reportedly not as engaged in remote assessment and learning as they have been in face-to-face settings and interactions;
- What components of the assessment were and were not included;
- What testing, data collection, and assessment methods were omitted and must be carried out when possible in order to finalize recommendations;
- A validity statement indicating that the results and/or interpretation of the results were likely impacted by the virtual assessment;
- A recommendation that outstanding components of a comprehensive evaluation be completed and findings confirmed once face-to-face assessment is safe. This is especially critical when there is a major change in placement (e.g., transitioning from a virtual to physical classroom, new school or classroom placement) or change in a student's needs related to their disability), or at a minimum prior to transition to a new school or to post-secondary education (e.g., college, transition or living skills program).

When conducting a remote assessment or reporting assessment results that have been collected virtually and/or reliant on the interpretation of untrained assistants, it is essential to include a disclaimer statement within the evaluation report. This is necessary to ensure that assessment workarounds do not become a permanent way of conducting comprehensive evaluations as remote assessments may be limited in scope and may not yield sufficient data to make meaningful individualized recommendations.

Data Collection

When determining eligibility for specialized services, the IEP team must consider data from all available sources. Use all available data from before school closure and during COVID-19 re-opening (either with virtual or in-person learning). Reference any data that helps describe a student's performance before school closures and compare that to the student's performance during remote or hybrid learning. As with any assessment, consultation with the classroom teacher is helpful to learn what the expectations are of all students, and to gather information about the blind or low vision student's performance and engagement with their learning. Consultations with the student's parent or guardian can provide valuable information about the student's:
- Home environment and how the family has been faring during the COVID-19 pandemic
- Access to resources and supports for distance learning
- Engagement with distance learning
- Expectations of other siblings' performance during distance learning
- Academic performance before and during distance learning

Quantitative and/or qualitative data can be used to determine a student's needs for special education services. How a student is presently engaging in distance learning must be reported as part of their present levels of performance.
- *Quantitative data = Any data in a numerical format, such as counts or percentages*
- *Qualitative data = Any data that is non-numerical and typically describes observations, qualities, or characteristics*

A comprehensive evaluation typically includes quantitative and qualitative data from multiple sources including testing outcomes. In a remote assessment, the evaluator is likely more dependent on qualitative data as gathered from the following sources *(the following is excerpted from the [CA Association of School Psychologists (CASP) Resource Paper](#)):*

As with best practice in assessment pre-COVID, data collection should encompass all available data sources and not just from tests in order to draw the defensible conclusions about student strengths and

potential disabilities. With COVID restrictions in place where test data might not be available or have questionable validity with modified administration procedures, data from extensive record review and carefully structured interviews will be vital to obtain. Some general guidance related to data gathering from records, interviews, and observations is as follows:

- **An extensive review of records (file review)** can yield useful data about the student's previous and current functioning levels (e.g. as comparison). Electronic school records should be readily available for review which can identify the student's functioning prior to school closure and can establish if the student's difficulties are "chronic" in nature and/or establish the rate of growth. More current records since school closure, including student grades and written assignments along with teacher notes regarding participation in online instruction, will yield insights about student performance and quality of thinking abilities. Reviewing records from outside service providers, if any, will also help to determine performance and/or progress and identify the amount and type of intervention as well as reveal the student's response to these interventions.
  - *Additional statement from this document's authors regarding assessment of blind and low vision students:* As with any assessment, the evaluator must make every effort to obtain a copy of a recent eye report from an eye doctor (current within the last year). Families should be encouraged at every annual IEP meeting to schedule annual eye exams and provide a current report every year. Information from an eye report can be compared with previous eye reports to check for any changes in visual functioning and to align with data gathered from a functional vision assessment.
- **Interviews with the IEP team and student's family** should be…structured in order to gain the best insights from informed respondents such as teachers, parents, and/or caretakers. Questions should be tailored to the "assessment questions" [the evaluator seeks to] answer about the student. For example, if it is an initial assessment to determine eligibility for services, questions should be directed to seek evidence of difficulties that reflect [a student's challenges with accessing their learning as a result of their disability]. [If it is a triennial assessment to affirm eligibility and continue with services, questions should be directed to justify the ongoing need for services. Whenever possible, students should be included in the interview process] to identify useful information for cross validation. As always…it is best practice to also inquire about situations where the student is successful.
- [**Observations in various learning environments, including virtual classrooms and online learning management systems (LMSs)** can convey meaningful information]. A possible setting for observation data is to drop into virtual classrooms to observe student participation and/or interaction with others. [This can be accomplished with prior communication with the classroom teacher.] Even more so than in pre-COVID-19 times, understanding the teacher expectations of the class session before observing in order to properly interpret such observation data is crucial. Multiple observations in different subject areas (e.g. in both [challenging and less challenging] subjects) will likely yield the most reliable set of data. This observation data will be further enhanced if the teacher is asked to comment on the data for accuracy.

Triennial Evaluations

Comprehensive re-evaluations typically occur at a minimum every three (3) years or when there is a major change in school placement or student's needs as a result of their disability. In cases where determination of a student's eligibility for educational vision or orientation and mobility services is not in question, the emphasis of a triennial is to document the impact of a student's disability. Considerations must include a student's needs for specialized services in order to access the core curriculum and demonstrate progress in the expanded core curriculum. Any new concerns must also be addressed in the assessment. In a remote assessment situation, focus on gathering data from multiple sources

including a file review, interviews with the family (including the student) and team, and observations in various learning environments. As always, make the best effort to coordinate with the family and student, and obtain a copy of a recent eye report (ideally within the past year). In some cases, there may be sufficient previous data that align with current informally gathered data to document continued eligibility for specialized services.

Initial Evaluations

If continuing an assessment from before school closures, determine what additional information is needed to determine the impact of a student's disability on their access to education. For new assessments (those initiated during the 2020-2021 school year and/or during COVID-19 school closure), it is vital to advocate for conducting as thorough an assessment as safely possible. As consistent with assessment recommendations pre-COVID, reliance on a medical report alone to determine eligibility is insufficient to qualify a child for special education services. Determining eligibility simply based on a medical report does not help the educational team understand the accommodations and supports a student needs to ensure access to the educational environment as necessitated by FAPE ([IDEA §300.304(b)(1)](#)). For all assessments, follow your district's assessment guidelines and procedures specific to COVID-19 and gather data from an extensive file review, interviews with the family and IEP team, and observations in the various learning environments. Be sure to review data from previous reports, including previous interventions and accommodations. As with all assessments, include a disclaimer statement that can be used to guide how the evaluation can be made complete when circumstances allow. The following section provides more information about what to include in a disclaimer statement.

Disclaimer Statement

Remember! **When conducting a remote assessment or reporting assessment results that have been collected virtually and/or reliant on the interpretation of untrained assistants, it is essential to include a disclaimer statement within the evaluation report. This is necessary to ensure that assessment workarounds do not become a permanent way of conducting comprehensive evaluations as remote assessments may be limited in scope and may not yield sufficient data to make meaningful individualized recommendations.**

The disclaimer statement should include the following:
- Statement that the reported data do not comprise a comprehensive evaluation
- How data were gathered
- State what activities the evaluator was and was not able to carry out; identify what excluded activities would be necessary to complete the evaluation
- Discuss the validity of the data that was gathered; how accurate is the reported information? Was the interpretation of the data impacted by the virtual modality and if so, how?
- Recommendation that outstanding (excluded) components of a comprehensive evaluation be completed when there is a major change in placement (e.g., transitioning from a virtual to physical classroom, new school or classroom placement <u>or</u> change in a student's needs related to their disability), <u>or</u> at a minimum prior to transition to a new school or to post-secondary education (e.g. college, transition or living skills program).

4. In-Person Assessment Considerations During COVID-19

Section 4 Summary: If choosing to delegate certain test activities to a non-credentialed person (such as a member of the student's household), be sure to describe how the tests were delegated and ensure

that any needed materials are sanitized and sent to the student's home prior to assessment. When delegating assessment, consider the validity of the test results. If the test results are largely invalid when delegated (see below for validity information), it can be more reasonable to simply rely on qualitative data gathered from an extensive file review, interviews with the family, student, and IEP team, and observations in various virtual learning environments (See Section 3, *Remote Assessment Considerations*). Remember to include a disclaimer statement that identifies how tests were carried out, and that the results of assessments during COVID-19 may not be wholly representative of a student's skills or challenges. If assessing a student in-person, follow proper preparation and safety procedures. These procedures should adhere to your district/county guidelines, which should be referencing state and CDC guidelines.

Delegation of testing to non-credentialed personnel (such as a member of a student's household)

To date, there is no research to confirm the validity and reliability of remote assessments.
- Validity = the degree to which the tool measures what it claims to measure ([Volkmar, 2013](#))
- Reliability = the consistency of a measure (results) across multiple testing occasions and evaluators.

The *[CA Association of School Psychologists (CASP) Resource Paper](#)* sites the [Board of Behavioral Sciences Statutes and Regulation of Relating to The Practice of Educational Psychology](#) (BBS, January 2020), Chapter 13.5, Article 5, section 4989.54. Unprofessional Conduct subsection(s) highlights the inappropriateness of reproducing, describing, or providing access to any psychological test to anyone other than those with professional interests who are expected to safeguard the use of the instrument.

When considering remote testing of students with visual impairments, it is important to distinguish between standardized and non-standardized tests. Standardized tests are given by trained professionals and given in the same way to all students, including time, presentation of materials, scoring, etc. It is not recommended to give standardized tests during remote instruction since the areas requiring standardization cannot be met.

In general, we must conduct our assessments with best intentions while abiding by ethical standards. Be sure to document everything and remember that all recommendations must be defensible. If choosing to delegate any non-standardized test activities to be carried out in a student's home or other location by a non-credentialed person, consider the validity of the test results. If it is too difficult to produce valid test results, then rely instead on data gathered from an extensive file review, interviews with the family, student, and IEP team, and observations in various virtual learning environments (See Section 3, *Remote Assessment Considerations*). Any testing materials that are sent to a student's home should be sanitized before shipping, and arrive with adequate time to orient the assessor to the materials. All efforts to standardize the testing environment should be made, including:
- Ensuring a space free from distractions or interruptions
- Use of reliable technology and tools for remote communication
- Coaching the assessor in how to use measuring tools and testing materials
- Supervising the assessor throughout all delegated testing activities
- Use of the family's primary language to ensure clear directions and communications

Whenever testing is delegated to non-credentialed personnel, it is important to document how and why the testing was conducted in this way. A disclaimer must be included to recognize that test measures might have limited validity due to the nature of how data were gathered. As with all testing, be sure to confirm data using multiple sources of information. It is always important to check for bias with any data

gathered from a single measure. All data should be considered holistically and gathered from multiple sources.

In-person testing with students

The following section is excerpted from the [CA Association of School Psychologists (CASP) Resource Paper](#)):

If your district has decided to do in-person testing with students, here are suggestions for proper preparation & safety procedures. However, always check and adhere to your district's and county's guidelines which should be referencing the state and CDC guidelines.

- **BEFORE testing:**
  o Consider scheduling assessment appointments when other students are not receiving instruction on the same area of campus.
  o Identify a large office space or classroom to allow for appropriate social distancing between [the evaluator] and student - with open door(s) and/or windows for ventilation/air circulation.
  o Maintain a student contact log for contact tracing purposes.
  o [Consider additional informed consent procedures for parents to acknowledge the risk of in-person testing.](#)
  o Consider temperature checks prior to entering school.
  o Ensure all testing material is thoroughly cleaned.
  o Designate a safe waiting area for parents or ask them to wait outside or in car.
- **DURING testing:**
  o Consider use of an air purifier with HEPA filter and UV light sanitizer to minimize germs only if you can close the doors and windows of an office.
  o Student and [evaluator] to hand sanitize at the start and end of every session.
  o [The LEA should] provide face coverings for the evaluator and student during all sessions.
  o Consider use of a plexiglass divider or clear barrier in between student and evaluator.
  o Provide new/cleaned writing utensils for each student in a Ziploc bag and have students put all used utensils and materials in the bag at the end of testing.
  o Adhere to safe distancing protocol in testing room (i.e. only sit on designated chair and no moving furniture, no shaking hands, try not to touch face & sanitize immediately after if so).
  o Develop plans for breaks (have a designated place for snacks and/or water, a designated area where students can walk/move, and where to use the restroom).
  o Consider the use of clear film on each testing flip book/paper materials to allow for cleaning after each student's use.
  o If appropriate, consider use of test material with limited hands-on materials/manipulatives.
- **AFTER testing:**
  o Follow district/state cleaning protocols after every test session for the room, the test manipulatives and restroom, waiting, and hallway areas. See '[Disinfecting testing materials](#)' resource for helpful tips.
  o Evaluators can consider wearing gloves when scoring the individual protocols.
  o If a student or family member tests positive for the virus, the parent agrees to immediately inform the evaluator. The evaluator must also immediately inform the family if staff tests positive for the virus.

o   Document in your testing section the safety precautions that were used (masks, plexiglass, etc.) and include a validity statement if you believe any of the safety procedures may have an impact on the interpretation of results [for example, the student did not demonstrate optimal or expected responses or attention, or the evaluator was unable to set up the testing materials while maintaining a social distance, or did not have all testing materials available].

5. Final Considerations When Assessing Students with Visual Impairments During COVID-19

A. **Exiting a student from special education during COVID-19**. Be very cautious about exiting students from services unless that procedure had already begun pre-COVID. Without comprehensive testing, justifications for exiting a student could be considered very questionable.

B. **Role of the TVI/COMS.** TVIs and COMS may be charged with adapting and amending the IEP goals, accommodations, and services to consider the child's vision impairment in the context of online instruction (Holbrook et al., 2017). As part of a VI Specialist's role in ensuring students' equitable access to education, this advocacy for accommodations in an online learning environment is paramount (Siu & Presley, 2020). *Example: Non-vision specialists might not understand the role that visual fatigue plays in a student's ability to participate remotely in their mainstream classes for long periods of time.*

C. **Transitioning from remote to in-person assessment.** As California districts begin to transition to on-site evaluation, special considerations may need to be given to students with visual impairments, who may, for example, struggle with mask use in conjunction with glasses, need to touch surfaces as part of navigation, and need to be in close contact with a guide. Additionally, PPE such as plexiglass shields and face shields can introduce glare as a variable and invalidate the results. If on-site evaluation is being considered by any special education team member, these additional challenges should be brought forth by vision specialists to ensure that the student is a good candidate for in-person evaluation.

6. Additional Resources

US Department of Education

- COVID-19 ("Coronavirus") Information and Resources for Schools and School Personnel (U.S. Dept. of Education)
- FERPA and the Coronavirus Disease 2019 (COVID-19), Available in English and Spanish (U.S. Dept. of Education, March 2020)
- Fact Sheet: Addressing the Risk of COVID-19 While Protecting the Civil Rights of Students (U.S. Dept. of Education, Office of Civil Rights)

National and California Association of School Psychologists (NASP and CASP) and Other COVID-19 Related Resources

- CA Association of School Psychologists (CASP) Resource Paper
- COVID-19: Special Education and Service Delivery (NASP)
- COVID-19 Resources (CASP)
- "CleanRoom" Assessment Testing During COVID-19 Shutdown (Ivonne Watson, Bilingual School Psychologist)
- COVID-19 Impact Profile Checklist and Questionnaires (Riverside Insights)

Updated August 25, 2020

Information Specific to Students With Visual Impairments

- COVID-19 Updates: Parent Resources, Teacher Resources, Guide for Accessing Zoom meeting through a Keyboard (CSB)
- School Reopening Guidance Overview: California State Special Schools (CA Dept. of Education)
- CA School for the Blind Assessment Center, a statewide resource that provides support with:
  - Parent and staff consultation
  - Student assessment
  - Professional development
- CA Guidelines for Programs Serving Students with Visual Impairments (2014)
- CA Clearinghouse for Specialized Media & Technology (CSMT) Technology Webinar Series (June, 2020)
- Guidance Letter for Remote Instruction (ACVREP, COMS Subject Matter Expert Committee)

References

Publication Manual of the American Psychological Association: 7th Edition. (2019)

Holbrook, C. M., McCarthy, T., & Kamei-Hannan, C. (2017). *Foundations of Education: Volume II: Instructional Strategies for Teaching Children and Youths with Visual Impairments*. Louisville, KY: APH Press.

Volkmar, F. R. (2013). *Encyclopedia of Autism Spectrum Disorders*. Springer.

Siu, Y., & Presley, I. (2020). *Access Technology for Blind and Low Vision Accessibility*. Louisville, KY: APH Press.

Authors' Note

We wholeheartedly thank the California Association of School Psychologists (CASP) for their foundational work in publishing the Resource Paper that supported this Guidance Document. In kind, we offer this Guidance Document for other agencies and organizations to revise for local needs and trends. We hope that this Guidance Document will support practitioners in their work during uncertain times.

Guidance Document Authoring Team
Yue-Ting Siu, TVI/COMS, Ph.D (Chair)
Lizbeth Barclay, TVI/COMS
Kathryn D. Botsford, TVI/COMS, Ph.D
Nicholas B. Casias Ed.D., COMS
Monique Coleman, TVI
Stephanie Herlich, TVI/COMS
Vanessa Herndon, TVI
Amanda McKerracher, Ph.D
May Nguyen, MS, LEP, NCSP
Amanda Lueck, TVI/COMS, Ph.D
Sharon Sacks, TVI, Ph.D