



Change in Placement and Change in Location Process Guidance¹

August 2025

INTRODUCTION

The Office of the State Superintendent of Education (OSSE) provides this guidance to support local education agencies (LEAs) in meeting federal Individuals with Disabilities Education Act (IDEA) and District of Columbia requirements related to providing students with disabilities with a free appropriate public education (FAPE) in the least restrictive environment (LRE). Placement and service location are related but separate and distinct notions. A student’s “placement” is the programmatic design, including the amount of services and type of educational environment, that the individualized education program (IEP) team believes is necessary for the student to access FAPE. The student’s “service location” refers to the physical location where the student’s IEP will be implemented. As a student’s level of service increases, the physical location may need to be adjusted to meet the student’s service and accommodation needs. While the IEP team determines the student’s placement, the LEA may determine the student’s service location based on the availability of necessary programming, services, or resources.

If a member of a student’s IEP team anticipates that a student may require a more restrictive nonpublic school placement, it must seek a change in placement (CIP) review from OSSE.

CHANGE IN PLACEMENT PROCESS

Only an LEA can submit a CIP request to OSSE. To submit a CIP request, the LEA must submit a request with a justification for removal statement (JRS) to OSSE via Katie.Red@dc.gov.

There is not a required template for the JRS, but the JRS must include:

- A description of the child’s special education and related service needs;
- A description of the services that have been considered by the team and implemented as strategies for success in the general education environment or LRE;
- A description of any specific placements and/or locations under consideration or requested by the parent and/or the LEA; and
- A description of provisional plans for reintegration back into a less restrictive learning environment.

To support effective and timely processing of your request, LEAs can also provide the following student documentation:

- Current/historical IEPs or multidisciplinary team (MDT) decisions;
- Current/historical progress reports (e.g., report cards, grade summary);
- Current/historical incident and discipline reports;
- Transcript (high school only);
- Current/historical assessments/evaluations;

¹ 5-A DCMR §3025 “Placement Outside of the LEA”

- Parent contact information (e.g., phone number, email address);
- Attendance records;
- Student schedule; and
- Any complaints and associated decisions (e.g., due process, state complaint, request for mediation).

Once a CIP request is submitted:

An OSSE coordinator will be assigned to complete the 30-day review. The coordinator will acknowledge receipt of the case via email, in which they will request specific student documentation and propose meeting dates.

1. ***Initial meeting with the LEA:*** During this meeting, the coordinator will review the case with the LEA and provide initial training and technical assistance.
2. ***Change in placement meeting:*** During this meeting, attended by the parent and LEA, the coordinator will issue a state recommendation regarding whether a more restrictive setting is warranted for the student. If the team moves forward, the service location process begins.

OSSE will not move forward with scheduled meetings if the requested documentation has not been provided. It is the responsibility of the LEA to be fully prepared to present the student’s case, which includes having and providing student records and being available for meetings.

SERVICE LOCATION PROCESS

Should the student’s team determine that a more restrictive environment is warranted, OSSE will proceed with the process to identify a nonpublic school service location.

At the CIP meeting, the coordinator will review the process for sending out admissions packets. Admissions packets are student records sent to nonpublic schools that may include the student’s IEP, evaluations, and other documents that provide information about the student’s education needs. The coordinator will solicit feedback from the parent and LEA on the specific nonpublic schools being considered; however, OSSE can only issue service location placements to schools or programs that hold a certificate of approval (COA). The list of schools that hold a COA can be found [here](#).

To send out student records, OSSE must have a signed consent form from the parent that approves their release. Once the signed consent form has been received, the coordinator will send admission packets to nonpublic schools.

The parent is responsible for communicating with nonpublic schools to schedule in-person visits or interviews, virtual interviews, and/or shadow day visits. It is the responsibility of the LEA to support the parent in completing the required admissions activities.

Once the nonpublic schools under consideration have rendered their decisions on admissions, OSSE will solicit feedback from the parent. OSSE will use the parent and LEA’s feedback, in combination with OSSE’s knowledge of the programmatic features of nonpublic schools, to make a final decision regarding the school selection.

After a school is selected, OSSE will notify the parent, LEA, and nonpublic school of the LEA’s requirement to schedule an IEP meeting. The LEA must complete a prior written notice (PWN) and

submit it to the parent and OSSE. Once the PWN is received, OSSE will issue a Notice of Service Location letter that will be emailed to the parent, LEA, and nonpublic school. Once a service location has been issued and the LEA has issued a PWN of placement, the nonpublic school will begin serving the student immediately, unless other arrangements have been agreed upon by all parties.

CHANGE IN LOCATION

Should a student require a change in location from one nonpublic school to another nonpublic school, or a move from a nonpublic day school to a nonpublic residential school, the LEA should submit a request to OSSE for a change in location (CIL).

Once a CIL request is submitted:

An OSSE coordinator will be assigned to complete the review and will acknowledge receipt of the case. In the acknowledgment email, the coordinator will request specific student documentation and propose meeting dates.

- 1. OSSE/LEA check-in:** During this meeting, the coordinator and the LEA will discuss the location change request, and the coordinator will provide technical assistance as appropriate.
- 2. Change in location meeting date:** During this meeting—attended by the parent, LEA, and current nonpublic school—the team will discuss the need for a change in location and adjustments to programming at the current nonpublic school that could be made to ensure educational stability, then make a determination if a new service location is required.

LEA RESPONSIBILITY

A student placed into a nonpublic setting remains the responsibility of the LEA. OSSE implements the District's policies and procedures regarding the placement of students with disabilities in nonpublic schools for the purpose of ensuring that students with disabilities are educated in the LRE that can appropriately meet their needs.

ADDITIONAL GUIDANCE

If you have questions regarding LEA obligations in the change in placement process or seek more information, please see OSSE's [Nonpublic Placement Information](#) page or contact Katie Reda at Katie.Red@dc.gov.

If you have questions regarding LEA special education obligations, please contact OSSE's policy team at OSSE.DSEpolicy@dc.gov.