

POLICY BOARD OF EDUCATION OF MONTGOMERY COUNTY

Related Entries: JEE-RA, KLA, KLA-RA
Responsible Office: Chief Operating Officer

Student Transfers

A. PURPOSE

To explain the limited circumstances under which students may be granted a transfer, referred to as a Change of School Assignment (COSA), to attend a school other than their home school or the school assigned in accordance with their Individualized Education Program (IEP)

B. ISSUE

Students are expected to attend the school within the established area in which they reside (home school) or assigned in accordance with their IEP. Students may submit applications for COSAs from the home school or the school assigned through the IEP process in cases of documented unique hardship, a recent family move within Montgomery County, and in certain circumstances to permit a sibling to attend the same school as another sibling.

C. POSITION

1. A student may apply for a COSA based on any of the following criteria:

a) **Unique Hardship**

Students may apply for a COSA when extenuating circumstances related to their specific physical, mental, or emotional well-being or their family's individual or personal situation that could be mitigated by a change of school environment. However, problems that are common to large numbers of families do not constitute a unique hardship, absent other compelling factors. Documentation that can be independently verified must accompany all hardship requests, or the request will be denied. Examples of such unique hardships include, but are not limited to, the following:

(1) **Child care**

Parents/guardians must demonstrate extenuating circumstances, in obtaining age-appropriate supervision of school students before and/or after school because –

- (a) their work hours extend significantly beyond the typical hours for available child care programs and activities located within the home school or otherwise easily accessible child care programs; and /or
 - (b) significant financial constraints limit the family's ability to otherwise access child care, or other student specified needs. The extenuating circumstances must be extremely significant for students beyond the elementary level.
- (2) When there are extenuating circumstances involving the physical, mental, or emotional well-being of the student.
- (a) Parents/guardians seeking COSAs for this reason should provide documentation of –
 - (i) ongoing treatment by a health care provider of issues related to the student's physical, mental, or emotional well-being that are directly related to or significantly impacted by the school environment; and/or
 - (ii) a significant health issue with unique care requirements (e.g., frequent medical appointments far from the student's home school and/or the parent/guardian's work location).

In the absence of such documentation, evidence of such extenuating circumstances may be obtained through consultation with school staff.

b) Family Moves

Students whose families have moved within Montgomery County, during the school year, who wish their student to continue attending their former home school may request a COSA without demonstrating a unique hardship. Such requests should be submitted immediately after the family moves, and such requests will be granted for the remainder of the current

school year only, with the exception that students in Grades 11 or 12 may be granted a COSA to stay through high school graduation.

c) Siblings

- (1) When a sibling seeks to attend the school where a sibling will be enrolled in the regular/general school program, or a special education program, during the year the sibling seeks to enroll
- (2) For elementary school students only, when a sibling attends a magnet, language immersion, or other application program, a COSA may be approved to the regular school program for siblings on a case-by-case basis
- (3) Such approvals require consideration of available classroom space, grade-level enrollment staffing allocations, or other factors that impact the schools involved.
- (4) Section (1), (2) and (3) above do not apply if a boundary change has occurred.
- (5) For the purpose of this policy, siblings include step-brothers and sisters, and half-brothers and sisters.

d) MCPS Staff

- (1) Consistent with MCPS strategic priorities to encourage and support school-based staff who work in Title I Schools, Innovative School Year Calendar Schools, or Focus Schools, staff based in any one of those schools may request a transfer for their own child to attend the school which they work under the following conditions:
 - (a) The staff member is assigned to work in one of the above referenced schools for the upcoming school year in a budgeted full-time equivalent (FTE) position that is eligible for leave, retirement, and health benefits coverage; and
 - (b) The staff member is a Montgomery County resident, and the student is otherwise eligible to enroll in MCPS; and

- (c) The request is accompanied by a plan for childcare or other supervision during all times during the staff member's duty day.
 - (2) If the student's enrollment in the school in which the staff member works becomes an impediment to the staff member's ability to perform their duties satisfactorily, the student transfer may be rescinded.
 - (3) The superintendent of schools may establish a process and timeline for consideration of such requests, as well as limit eligibility based on staff performance or conduct concerns.
 - (4) MCPS staff who do not work in one of the schools identified in this section may otherwise apply for COSAs for their children in accordance with requirements of this policy and related regulations.
2. COSAs are subject to the following procedures:
- a) COSA applications are to be submitted between the first school day in February and the first school day in April of the school year preceding the year of the desired transfer. Every effort will be made to notify parents/guardians and students of the decision regarding their COSA request by May 31. COSA requests submitted after the first school day in April will not be accepted unless the student is a new resident of Montgomery County or there is a bona fide emergency or event that could not have been foreseen prior to the first school day in April. Documentation supporting this situation must be supplied.
 - b) High school students who receive an approved COSA out of their current feeder pattern must attend the new school for one calendar year to be eligible to participate in athletics. A waiver from this restriction may be requested.
 - c) Parents/guardians accepting a COSA assume responsibility for transportation, and recognize that student parking is regulated on a school-by-school basis.
 - d) Reassignment from one consortium school to another after lottery assignments are finalized for that year are handled through the Division of Consortia Choice and Application Program Services, based on a unique hardship.

- e) The COSA application will be approved or denied after considering –
 - (1) the reasons for the request;
 - (2) for students receiving special education services, whether the IEP can be implemented at the requested school;
 - (3) applicable staffing and services available at the requested school;
 - (4) school capacity, including grade level and cluster capacity, and other issues that implicate the ability of the school to admit new students; and
 - (5) if the requested school has a utilization rate of less than 80 percent, the request may receive special consideration after factoring in any issues of capacity at the grade or cluster level.
- 3. Students attending an elementary school on a COSA must reapply for a COSA to attend a middle school other than their home middle school. Starting with students who enter 6th grade during school year 2021-2022, a student attending a middle school on a COSA seeking to attend the high school in that middle school's feeder pattern will have to reapply for a COSA. Starting with students who enter 3rd grade in 2021-2022, students in a middle school immersion program must apply for a COSA in order to attend a high school other than their home school, including the high school in that middle school's feeder pattern.
- 4. Students who have been admitted to countywide programs, regional programs, or programs specifically identified by the superintendent of schools in a publication that will be issued annually and distributed broadly to promote equitable access to these programs are not required to obtain a COSA to attend a school other than their home school. MCPS reserves the right to require students to return to their home school if they cease participation in the program.
- 5. MCPS shall implement a process, separate from the COSA process described in this policy, for the purpose of considering certain academic transfer requests for high school students as described below.
 - a) Students may request academic transfers to participate in either –
 - (1) a multi-year sequence of related courses, as defined in the district or school course catalog, that is not available at the student's home school, or

- (2) a multi-year single course sequence, as defined in the district or school course catalog, that is not available at the student's home school.
 - b) Such a process will include deadlines for submission of academic transfer requests that align with MCPS timelines for course registration and staffing needs.
 - c) Such transfers will be permitted only if space is available after local students enroll.
 - d) Consistent with the district's strategic priorities, MCPS may also consider adjustments to academic programming at the student's home school in lieu of granting the academic transfer request.
 - e) MCPS reserves the right to require students to return to their home school if they withdraw from the course-sequence for which the academic transfer request was granted.
6. Any child who has an older sibling who is currently enrolled in a language immersion program, and will continue to be enrolled in that language immersion program the year the younger sibling seeks to enroll, may participate in a lottery established by the superintendent of schools for admission into the language immersion program. Such lottery shall include a weighting process that takes into consideration factors to include: (a) students who have an older sibling who is currently enrolled in a language immersion program and will continue to be enrolled in that language immersion program in the year the younger sibling seeks to enroll; (b) socio-economic status and poverty; and, (c) other factors as identified by the superintendent of schools, such as, in specific circumstances, a catchment area. Any child who has an older sibling who was enrolled in a language immersion program during the 2017-2018 school year and has an older sibling who will continue to be enrolled in the language immersion program the year the younger sibling seeks to enroll, may enroll in the language immersion program without the necessity of participating in the lottery conducted for admission into that program.

D. DESIRED OUTCOMES

- 1. To maintain the stability of school attendance boundaries by promoting home school attendance and respecting the space needs or limitations and staffing allocations of the individual schools
- 2. To provide a process for students to receive a COSA when circumstances arise regarding a documented unique hardship, a recent family move within Montgomery

County, or certain circumstances to permit a sibling to attend the same school as another sibling

3. To provide clarity that the COSA process is distinct from the admissions processes for countywide programs, academic transfer requests, and administrative placements initiated by MCPS staff, the criteria for which are established by the superintendent of schools through administrative regulation

E. IMPLEMENTATION STRATEGIES

This policy is implemented through administrative regulation.

F. REVIEW AND REPORTING

This policy will be reviewed on an annual basis in accordance with the Board of Education policy review process.

Policy History: Resolution No. 288-72, April 11, 1972, amended by Resolution No. 825-72, December 12, 1972, reformatted in accordance with Resolution No. 333-86, June 12, 1986 and Resolution No. 458-86, August 12, 1986, accepted by Resolution No. 517-86, September 22, 1986; reviewed February, 1995; amended by Resolution No. 92-02, March 12, 2002; non-substantive modification, November 16, 2006; amended by Resolution No. 124-17, March 17, 2017; amended by Resolution No. 457-20 and Resolution No. 458-20 on October 6, 2020.

REGULATION

MONTGOMERY COUNTY PUBLIC SCHOOLS

Related Entries: ACA, COA-RB, COA-RC, IOI-RA, JEE, JGA, JGA-RA, JGA-RB, JGA-RC, FAA

Responsible Divisions: Division of School Leadership and Improvement; Division of Teaching and Learning

Student Transfers and Administrative Placements

I. PURPOSE

To establish procedures concerning within-county Changes of School Assignments (student transfers) and administrative placements

II. BACKGROUND

Students are expected to attend the school for the established attendance area in which they reside or the school to which they are assigned in accordance with an Individualized Education Program (IEP). As set forth in Montgomery County Board of Education Policy JEE, *Student Transfers*, a Change of School Assignment (COSA) request for a student to attend a school outside such attendance area may be initiated by the parent/guardian/eligible student (i.e., a student who has reached 18 (the age of majority) or is emancipated prior to the age of 18), or Montgomery County Public Schools (MCPS) staff.

III. DEFINITIONS

- A. The *assigned school* is a school other than the student's home school. The assigned school is the school assigned in accordance with the student's Individualized Education Program (IEP); participation in a countywide, regional, or other program established by the superintendent of schools; or administrative placement. When a student is granted a COSA, the requested school becomes the assigned school.
- B. The *home school* is the school within the established attendance area in which the student resides.

IV. TIMELINES AND APPLICATION PROCEDURES FOR REQUESTING A CHANGE OF SCHOOL ASSIGNMENT (COSA)

A. Application Procedures

1. To request a transfer to a school other than a student's home school, parents/guardians/eligible students may locate the annual COSA booklet—which contains student transfer procedures, deadlines, and the transfer request form—on the MCPS website or from their home school.
2. MCPS Form 335-45, *Request for COSA*, is available at every MCPS school and on the MCPS website in multiple languages.

B. Timelines

1. Timelines for COSA requests are established and updated each year in the COSA booklet, in compliance with Board Policy JEE, *Student Transfers*, and shared with schools and the community in late January every year.
2. Students must enroll in and attend their home school while a COSA request is being processed.
3. The completed MCPS Form 335-45 must be submitted to the principal/designee of the student's home school by the deadline stated in the COSA booklet.
 - a) The principal/designee of the student's home school will sign the form to signify verification of residency and acknowledge the request. Such a signature does not constitute agreement or disagreement with the request.
 - b) The student's home school will forward the completed form to the Student Support and Attendance Services (SSAS) for processing.
 - c) The SSAS will complete a review prior to making a decision.
4. Students receiving special education services available in all schools (for example, Speech and Language, Home School Model, Hours-based Staffing, or Learning and Academic Disabilities Services) should follow the regular COSA process.
 - a) If the student's Individualized Education Program (IEP) requires special education services that are not offered in all schools, the

parent/guardian/eligible student should indicate on the COSA form that the student receives special education services in a specialized program, in addition to submitting appropriate documentation indicating the reason for the COSA request.

- b) Decisions regarding requests for students receiving special education services that are not available in all schools will be made after July 1.
- 5. The parent/guardian/eligible student will receive written notification of approval or denial of a COSA request from the SSAS.
- 6. The home and requested schools will be notified that the request has been approved or denied.

V. STUDENT TRANSFERS SUBJECT TO AUTOMATIC APPROVAL

The following student transfers are automatically approved but require submission of MCPS Form 335-45, *Request for a COSA*, for record-keeping purposes:

- A. Paired schools are considered one school for COSA purposes. However, if students attend a paired elementary school on an approved COSA, they must submit a new MCPS Form 335-45, *Request for a COSA* (which will automatically be approved), to attend the upper elementary grade school. Each pairing has unique characteristics that can impact the implementation of transfers.
- B. Students assigned to Poolesville Elementary School who wish to attend Monocacy Elementary School must submit MCPS Form 335-45, *Request for a COSA*, which will automatically be approved.
- C. Out-of-area students in Downcounty Consortium middle school special programs are guaranteed enrollment in a Downcounty Consortium high school by participating in the *Choice* Process lottery.

VI. RETURNING TO THE STUDENT'S HOME SCHOOL

- A. A parent/guardian/eligible student may elect for a student to return to their home school at any time if the student—
 - 1. is attending a school on an approved COSA; or
 - 2. attends a countywide or regional program, or a program specifically identified by the superintendent of schools.

3. Students who are attending a school other than their home school because they are participating in a countywide or regional program will be required to return to their home school if they discontinue participation in such program.
- B. A student's return to their home school is determined by the appropriate MCPS administrator as follows:
1. Returning to a home school from a school assigned through a student's IEP is determined on a case-by-case basis by the Office of Special Education.
 2. Returning to a home school from a school assigned through an administrative placement as set forth in section VII.
 3. A principal may request the SSAS director to rescind a student's COSA with proper cause. Where safety is not a concern, the SSAS director will consider whether the principal/designee has notified the parent/guardian/eligible student of any concerns and whether available supports and appropriate behavior intervention strategies have been considered and attempted to allow the student to remain and either failed or were determined to be inappropriate for the maintenance of a safe, positive learning environment.
 4. COSA requests after an extended suspension generally are not approved and will be addressed by the SSAS director, in consultation with the school principals involved.
- C. When a student must reapply for a COSA
1. In certain circumstances, COSAs may be limited to one year only.
 - a) In cases where a family moves during a school year, a COSA may be granted to complete the school year (with certain exceptions set forth in Board Policy JEE, *Student Transfers*, section C.1.b).
 - b) In such cases, students must enroll in their home school for the next school year, unless parents/guardians/eligible students reapply for and receive a COSA to continue in the assigned school the next year.
 2. Unless otherwise set forth above, COSAs are granted for sufficient years to allow the student to complete grades at that school, and students must

reapply for a COSA to attend the next school in that feeder pattern. See Board Policy JEE, *Student Transfers*, section C.3.

VII. ADMINISTRATIVE PLACEMENTS

- A. MCPS has the authority and reserves the right to reassign a student to a different school or alternative instructional program for safety reasons.
- B. The Division of School Leadership and Improvement (DSLII) staff members are responsible for monitoring the academic progress, student engagement, and social adjustment of students with administrative placements. Students who are administratively placed have the right to participate in athletics and other extracurricular activities on placement.
- C. Administrative Placement Requested by DSLII
 - 1. A principal may request the administrative placement of a student for safety reasons through the appropriate DSLII area superintendent.
 - 2. Consistent with Board Policy JGA, *Behavior Intervention, Safety, and Well-being Plan*, the DSLII area superintendent is responsible for reviewing the request to consider the student's age, previous conduct impacting school safety, cultural or linguistic factors that may provide context to understand student behavior, circumstances surrounding any relevant incidents, and imminent threat of serious harm.
 - 3. The DSLII area superintendent submits the request to the SSAS director, who will, in consultation with the principal, the pupil personnel worker (PPW) assigned to the student's home school, and the appropriate DSLII area associate superintendent, review—
 - a) the student's educational, medical, and behavioral record; and
 - b) the request, to determine if appropriate behavior intervention strategies have been considered, attempted, and either failed or were determined to be inappropriate for the maintenance of a safe, positive learning environment.

4. The SSAS director—
 - a) approves or denies the DSLI-initiated administrative placement request; and
 - b) if the request is approved, the SSAS director selects the school where the student will be placed.
 5. A conference may be scheduled by the PPW with the principal, the parent/guardian, and the student to review the reason(s) for the administrative placement.
 6. The parent/guardian or eligible student may appeal the SSAS director's decision to administratively place the student. The appeal must be submitted to the Division of District Operations/Student Conduct and Appeals within 15 calendar days, following procedures set forth in section VIII.
 7. The parent/guardian or eligible student may request a review of the school assignment following procedures set forth in section VII.F.
 - a) If the parent/guardian/eligible student is also seeking an appeal of the decision to administratively place the student, the review of school assignment will wait until the resolution of that appeal.
 - b) See also section VIII.D, 3-4.
- D. Administrative Placement Initiated by the Superintendent of Schools/Designee
1. An administrative placement may be initiated by the superintendent of schools/designee.
 2. The parent/guardian or eligible student may appeal the superintendent of schools/designee's decision to administratively place the student. The appeal must be submitted to the Board of Education within 10 calendar days, following procedures set forth in section VIII.
- E. Administrative Placement Involving a Reportable Offense
- MCPS Regulation COA-RC, *Responding to Reportable Offenses by Students*, sets forth the requirements and procedures for developing an educational program and safety plan for a student who has been arrested for a reportable offense, which means an offense that occurred off MCPS property and involved certain crimes of

violence defined in COMAR.13A.08.01.17.A.(8)(c). These crimes of violence include, but are not limited to, arson; assault; burglary; criminal organization activity; offenses related to controlled dangerous substances and noncontrolled substances; offenses related to destructive devices and weapons; and using a minor to manufacture, deliver, or distribute a controlled dangerous substance.

School of Assignment for Administrative Placements

1. The SSAS director assigns the school where a student will be administratively placed. The school assignment will take into consideration school capacity, transportation, and opportunities for the student's overall school success, including positive peer relationships and engagement in the school community.
2. The PPW may schedule a conference with the parent/guardian and the student to consider possible schools to which the student may be assigned.
3. When the superintendent of schools/designee determines an administrative placement is necessary following an extended suspension, the SSAS director will—
 - a) notify the parents/guardians/eligible student in writing that the student will be administratively placed in a new school at the conclusion of the extended suspension, and
 - b) inform the parents/guardians/eligible student of the new school assignment, in writing, no fewer than five work days prior to the end of the suspension period.
4. Request for a review of the school assignment

Once notified of the new school assignment, the parent/guardian/eligible student may request a review of the school assignment if they believe the assignment creates an undue hardship for the family or precludes opportunities for the student's overall school success, including positive peer relationships and engagement in the school community.

- a) That request should be made in writing to the SSAS director, who will review the request.
- b) If the SSAS director reviews the request and determines that the new school assignment does not create an undue hardship for the family or preclude opportunities for overall school success, the

parent/guardian/eligible student should follow the process for appealing a change of school assignment (COSA) under section VIII C. of this regulation.

VIII. APPEALS

COSA Denial	COSA Rescission	Administrative Placement by DSLI	Administrative Placement by Superintendent	School of Assignment (for Administrative Placements)
To superintendent within 15 calendar days of the denial decision	To superintendent within 15 calendar days of the rescission decision	To superintendent within 15 calendar days of the placement decision	See below (appeal directly to the Board)	Request a review of the assigned school by the director of SSAS. If unsatisfied with SSAS decision, appeal to the superintendent within 15 calendar days of SSAS decision.
To Board within 30 calendar days of the superintendent/designee's decision	To Board within 30 calendar days of the superintendent/designee's decision	To Board within 10 calendar days of the superintendent/designee's decision	To Board within 10 calendar days of the superintendent/designee's decision	To Board within 30 calendar days of the superintendent/designee's decision

A. Appeals to the Superintendent of Schools

1. The chief of the Division of District Operations serves as the superintendent of schools' designee for appeals of COSA decisions and administrative placements (except for administrative placements initiated by the superintendent of schools).
2. Appeals of a COSA denial, COSA rescission, or administrative placement must be made in writing and must be received by the superintendent of schools/designee within 15 calendar days of the date of the decision letter (except when the administrative placement was initiated by the superintendent of schools, see section VIII.E.1).

3. The appeal should state the reasons for seeking a review of the decision and include any additional information to be considered.
4. The superintendent of schools/designee will review all available information before issuing a decision.
5. Although the matter is usually considered based on the documents received and telephone conferences, in-person conferences may be arranged by the superintendent of schools/designee's hearing officer.
6. Decisions will be made promptly, given the number, complexity, and timing of appeals being handled at the same time.

B. Appeal of a Denied COSA Request

1. A COSA request that is denied may be appealed to the superintendent of schools/designee.
2. The student must enroll in and attend the home school while the appeal of a COSA denial is in process, except in the case of administrative placements.
3. Appeals of COSA denials received by the superintendent of schools/designee before July 1 will be decided prior to the beginning of school.

C. Appeal of a Rescinded COSA

1. If a student's COSA is rescinded, the rescission may be appealed to the superintendent of schools/designee.
2. The student may remain enrolled in the assigned school (i.e., the school to which the student had received a COSA) during the appeal.
3. If the superintendent of schools/designee upholds the rescission, the student returns to their home school. The student remains in their home school if the parent/guardian/eligible student chooses to appeal to the Board of Education.

D. Appeal of an Administrative Placement

1. The decision to administratively place a student may be appealed to the superintendent of schools/designee, except when the administrative

placement was initiated by the superintendent of schools (see section VIII.E.1).

2. The school to which a student was administratively placed may be appealed to the superintendent of schools/designee, after first requesting a review by the SSAS director (see section VII.F).
3. The student must remain in the assigned school to which the student was administratively placed during the appeal, except as specified in VIII.C.3.
4. When an administrative placement follows an extended suspension, the student may stay at the school attended during the extended suspension, or they may attend the school to which they were assigned following the suspension.

E. Appeal to the Board of Education

1. An appeal of the decision of the superintendent of schools/designee must be made in writing and received by the Board—
 - a) within 30 calendar days of the date on the superintendent of schools' decision letter regarding a COSA denial or COSA rescission.
 - b) within 10 calendar days of the date on the superintendent of schools' decision letter regarding a decision to administratively place the student.
2. Appellants are strongly encouraged to file any appeal as soon as possible.
3. As set forth in Board Policy BLB, *Rules of Procedure in Appeals and Hearings*, the superintendent of schools/designee will be given the opportunity to respond, with a copy sent to the appellant, before the Board considers the appeal.
4. During the Board appeal process, the student should be enrolled in the school stipulated in the decision made by the superintendent of schools/designee.
5. The Board's decision will be rendered in writing, based on procedures set forth in Board Policy BLB, *Rules of Procedure in Appeals and Hearings*.

Regulation History: Formerly Regulation 265-2, February 22, 1980, revised January 23, 1992, revised April 25, 1994; revised

December 23, 1994; revised December 30, 1997; revised July 20, 1998; revised December 2, 1999; updated office titles June 1, 2000; revised December 6, 2000; revised January 7, 2002; revised January 10, 2003; revised November 29, 2006; non-substantive revision, November 27, 2007; non-substantive revision, November 17, 2008; revised January 04, 2010; revised November 18, 2010; revised, December 12, 2011; revised December 20, 2012; revised November 6, 2013; revised December 13, 2013; revised April 5, 2018; revised January 7, 2019; revised September 28, 2023; revised November 21, 2024; technical update of directory information October 9, 2025.