Functional Assessment

The Individuals with Disabilities Education Act (IDEA) was reauthorized in 2004 followed by the publication of the implementing regulations published in the Federal Register on August 14, 2006. The Office of Special Education Programs included in the Federal Register the Analysis of Comments and Changes section in the preamble which provided the rationale for each of the regulatory changes. The following regulations and Federal Register Analysis information is taken directly from the Federal Register to assist in providing clarification and support.

Implementing Regulations

§300.304 (b) (1) Evaluation Procedures
In conducting the evaluation, the public agency must use a variety of assessment tools and strategies to gather relevant functional, developmental, and academic information about the child including information provided by the parent.

§300.320 (a)(1)(i)(ii) Individual Education Program
…IEP…must include a statement of the child’s present levels of academic achievement and functional performance…

Federal Register Analysis: It is not necessary to include a definition of “functional” in these regulations because we believe it is a term that is generally understood to refer to skills or activities that are not considered academic or related to a child’s academic achievement. Instead, “functional” is often used in the context of routine activities of everyday living. We do not believe it is necessary to include examples of functional skills in the regulations because the range of functional skills is as varied as the individual needs of children with disabilities. We also decline to include examples of how functional skills are measured because this is a decision that is best left to public agencies, based on the needs of their children. However, it should be noted that the evaluation procedures used to measure a child’s functional skills must meet the same standards as all other evaluation procedures, consistent with §300.304(c)(1).

Federal Register Analysis: We do not believe it is necessary to include a definition of “functional” in these regulations because the word is generally used to refer to activities and skills that are not considered academic or related to a child’s academic achievement as measured on statewide achievement tests. There is nothing in the Act that would prohibit a State from defining “functional,” as long as the definition and its use are consistent with the Act.

We also do not believe it is necessary for the definition of transition services to refer to all the major life functions or to clarify that functional performance must be a consideration for any child with a disability, and not just for students with significant cognitive disabilities. As with all special education and related services, the student’s IEP team determines the services that are needed to provide FAPE to a child with a disability based on the needs of the child.
Eligibility vs. Program Development (IEP)

The criteria for determining eligibility for special education can be found in “Determining Eligibility for Special Education in South Dakota”. Standardized testing and the resulting scores are used to meet the first prong in determining eligibility. The second prong requires that the disability adversely effect educational performance resulting the child’s need for specially designed instruction. [http://doe.sd.gov/oess/specialed/forms/pdf/DeterminEligibilitySpecEd.pdf](http://doe.sd.gov/oess/specialed/forms/pdf/DeterminEligibilitySpecEd.pdf)

Standardized testing is used to meet the first prong of eligibility, determining a specific disability. Standardized evaluations used for determining eligibility may not be used as the student’s functional assessment. Some standardized diagnostic evaluations elicit functional skills and may be used as long as they were not used for the purpose of eligibility. Functional assessment is used to determine educational impact, the second prong required for eligibility. If the student is found by the IEP team to be an eligible student, who requires specially designed instruction (IEP), the skills identified through functional assessment is what the team will use to develop the students program or IEP.

**Purpose**

Functional assessment is intended to identify specific skills in the area(s) of disability needed to develop the child’s strengths and needs for the present levels of academic achievement and functional performance (PLAAFP). By locating where the students strengths and needs fall in the general curriculum the IEP team will be able to address the level of instruction needed to close the gap. The IEP team may include as many skills as necessary in the students PLAAFP to show growth and close the gap.

During the process of evaluating achievement, districts will gather relevant functional, developmental and academic information. The academic side will consist of the practical skill (strengths and needs) in the areas affected by the disability. (i.e. identifying main ideas in a story). "Functional" is often used in the context of routine activities of everyday living. Functional skills are addressed from the point of view of "use". (i.e. one needs to identify the main ideas in a story so the student can read and develop a resume with the appropriate content). (i.e. adding and subtracting double digit numbers is needed to balance a checkbook or make correct change). One identifies the academic skill the other identifies the functional use of that skill. The academic skills for a student with articulation errors will be the sounds they can produce and the sounds they need to learn how to produce. The functional skills related to this will be their ability to use the sounds correctly in words so they are understood by adults/peers during conversational speech.

With that, both academic and functional will need to be acknowledged for the skill area(s) affected by the disability in the students PLAAFPs. It will look differently for each student. Goals should be developed to fit the student. One student may have a goal to "add/subtract double digit numbers". It may be more appropriate for another student’s goal to be "to add two double digit deposits in their checkbook". You would not write a goal for both just to have one that is academic and one that is functional...the skill to be learned is the same.

If the IEP does not address functional skills in the PLAAFPs, the IEP team should at least write a statement in the PLAAFP that the team considered functional skills and decided the academic skills are more applicable to the student and why.
Process
District Evaluation Team:
Based upon a review of referral information, existing data or new concerns, the evaluation team must decide what evaluation data is needed to determine eligibility/continued eligibility and develop the students program (IEP). It is possible, but unlikely, that the evaluation team would not want to update or administer achievement information (academic, developmental or functional). Based upon the category of disability for which the student is being evaluated, the district evaluation team will determine all required or necessary evaluations including any prior evaluations that will be pulled forward and used to make decisions. Once the district has decided what the evaluation package will look like, the recommended evaluation package is discussed with the parents to see if they feel any other areas of evaluation need to be included. This process is to be followed for initial evaluation, reevaluation, dismissal, or administering additional evaluations for whatever reason.

Prior Notice/Consent:
The district completes the prior notice/consent to include all areas of evaluation decided upon by the district and the parent. Functional assessment is considered part of achievement testing and can be documented on the prior notice as such. Consent is required if any new evaluations will be administered. If no evaluations are deemed necessary, parents must be informed of their right to a full evaluation. The 25 school day evaluation timeline begins when the district receives the signed consent from the parent. If new functional assessment will be conducted, consent is required and it must be conducted within the 25 school day timeline.

Evaluation Reports:
All new evaluation results (including functional) must be analyzed/summarized and documented into a report that must be given to parents. Copies of all evaluation results (old reports pulled forward or new reports) must be available for the team to make decisions. Evaluators may summarize and write individual reports (including functional) or the reports may be pulled together in a consolidated report (including functional). If the functional assessment data is formatted with the strengths and needs listed under each skill area affected by the disability, this information can be transferred directly to the PLAAFP in the IEP.

Prior Notice for the Meeting:
Document all tests records and reports that will be used during the decision making process (testing areas). If no new evaluations will be administered, the district must give the parents 5 day notice or the parent may choose to waive the 5 day notice so the meeting can be held immediately. Include all other content requirements.

Meeting/Eligibility Determination & Program/IEP Development:
Based upon all of the evaluation data gathered, including functional, the IEP team will determine if the student is eligible for special education. The district will document the team’s decision and provide the parent with a copy of the eligibility determination document. If eligible, the team will develop the student’s program (IEP).

Present Levels of Academic Achievement and Functional Performance (PLAAFP):
--Strengths: Identify the specific skills (linked to academic and functional assessment) the student has accomplished in the skill areas affected by the disability (including transition).
--Needs: For the skill areas affected by the disability (including transition), identify the specific skills (linked to academic and functional assessment) required by the student to achieve the present goals and make progress toward content standards in the general curriculum.
Note: Do not make or write placement decisions or restate test scores in the PLAAFPs.

--How the student's disability affects his or her involvement and progress in the general curriculum: Questions to consider; is the student receiving instruction in the general curriculum? How is the disability affecting progress in the general curriculum? What core content area(s) does the disability affect? What is the observable effect of the disability in the general education setting?
For preschool children, the PLAAFP describes how the disability affects the child's participation in age appropriate activities.
--Parent Concern: Documents the parents concerns or comments regarding their child educational program.
Sources of Functional Assessment

The sources of functional assessment will vary from student to student. No one source may be sufficient to gather all the information needed to develop the student’s program. More likely, several sources will be used to gather the information (student worksheets, teacher reports, Curriculum Based Measurement (CBM’s), informal checklists etc.). All sources will then be analyzed by skill area affected by the disability and summarized into a written report.

Oral Expression
Informal Checklists/Teacher Made Materials
Speech Sample
Brigance:
- Comprehensive Inventory of Basic Skills–Revised (CIBS–R) Grades Pre-K–9
- Inventory of Early Development–II Birth–developmental age 7

Listening Comprehension
Informal Checklists/Teacher Made Materials
Brigance:
- Comprehensive Inventory of Basic Skills–Revised (CIBS–R) Grades Pre-K–9
- Inventory of Early Development–II Birth–developmental age 7

Written Expression
Curriculum based assessment
Fitzgerald Read and Write Word List
Informal Checklists/Teacher Made Materials
Six Traits of Writing—Northwest Educational Laboratories
Spellmaster
Story starters
Work samples
Writing samples
AIMSweb
Brigance:
- Comprehensive Inventory of Basic Skills–Revised (CIBS–R) Grades Pre-K–9
- Inventory of Early Development–II Birth–developmental age 7

Basic Reading
Burns and Roe Reading Inventory
Curriculum based assessment
Dynamic Indicators of Basic Early Literacy Skills (DIBELS)
Dolch Sight Word List
Fitzgerald Read and Write Word List
Fry Instant Sight Word List
AIMSweb (English and Spanish)
Informal Checklists/Teacher Made Materials
Informal Test for Diagnosing Specific Reading Problems
Reading and Study Skill Mastery Activities (Study Skills)
Reading Skills Competencies Test
Woodcock Reading Mastery Test-R
Work samples
Eckwall/Shanker Reading Inventory
Brigance:
- Comprehensive Inventory of Basic Skills–Revised (CIBS–R) Grades Pre-K–9
- Inventory of Early Development–II Birth–developmental age 7

**Reading Fluency**
Burns and Roe Reading Inventory
Curriculum based assessment
DIBELS
Informal Checklists/Teacher Made Materials
Selected reading samples—using a science/social studies textbook and having the student read orally from a selection presented earlier in the year
Timed oral reading sample
Eckwall/Shanker Reading Inventory
AIMSweb
Brigance:
- Comprehensive Inventory of Basic Skills–Revised (CIBS–R) Grades Pre-K–9
- Inventory of Early Development–II Birth–developmental age 7

**Reading Comprehension**
Burns and Roe Reading Inventory
Curriculum based assessment
DIBELS
Informal Checklists/Teacher Made Materials
Informal Test for Diagnosing Specific Reading Problems
Woodcock Reading Mastery Test-R
Work samples
Eckwall/Shanker Reading Inventory
Spache Diagnostic Reading Inventory
Qualitative Reading Inventory-Second Edition
AIMSweb
Brigance:
- Comprehensive Inventory of Basic Skills–Revised (CIBS–R) Grades Pre-K–9
- Inventory of Early Development–II Birth–developmental age 7

**Math Calculation**
Curriculum based assessment
Informal Checklists/Teacher Made Materials
Key Math
Work samples
Star Math
AIMSweb
Brigance:
- Comprehensive Inventory of Basic Skills–Revised (CIBS–R) Grades Pre-K–9
- Inventory of Early Development–II Birth–developmental age 7
**Math Problem Solving**
Curriculum based assessment
Informal Checklists/Teacher Made Materials
Key Math
Work samples
Star Math
Brigance:
- Comprehensive Inventory of Basic Skills–Revised (CIBS–R) Grades Pre-K–9
- Inventory of Early Development–II Birth–developmental age 7

**Transition**
Brigance:
- Employability Skills Inventory Secondary Special Ed, Vocational, Adult Ed, ESL Programs
- Life Skills Inventory Secondary Special Ed, Vocational, Adult Ed, ESL Programs
- Inventory of Essential Skills Remedial–Grade 6+, Adult Ed
Community Based Vocational Exploration Narrative
Functional Skills Inventory
Informal Checklists/Teacher Made Materials
Situational assessment—takes a student on the job to find out what he or she can or cannot do
Supported employment functional assessment from job coach
Transition checklists—informal questionnaires given to the student
Street Survival Skills Questionnaire
Transition Tackle Box
Enderle-Severson Transition Rating Scales (ESTR)
Transition Planning Inventory (TPI)
Employer-completed work evaluations
Independent Living, Self-Advocacy, Post-Secondary Education Readiness, Service Provider Awareness, etc.

**Behavior**
Adaptive behavior checklists
Behavior checklists
Behavior Evaluation Scale (completed by the teacher)
Informal Checklists/Teacher Made Materials
On-task classroom monitoring checklist

**Speech**
Informal Checklists/Teacher Made Materials
Speech sample
Brigance:
- Comprehensive Inventory of Basic Skills–Revised (CIBS–R) Grades Pre-K–9
- Inventory of Early Development–II Birth–developmental age 7

**Language**
Informal Checklists/Teacher Made Materials
Language sample
Brigance:
- Comprehensive Inventory of Basic Skills–Revised (CIBS–R) Grades Pre-K–9
• Inventory of Early Development–II Birth–developmental age 7

**Occupational Therapy:**
Informal Checklists/Teacher Made Materials
Occupational Therapist's observation in classroom, PE and unstructured settings (playtime/recess, lunchroom)
Brigance:
• Comprehensive Inventory of Basic Skills–Revised (CIBS–R) Grades Pre-K–9
• Inventory of Early Development–II Birth–developmental age 7

**Physical Therapy:**
Informal Checklists/Teacher Made Materials
Physical Therapist's observation in classroom, PE and unstructured settings (playtime/recess, lunchroom)
Brigance:
• Comprehensive Inventory of Basic Skills–Revised (CIBS–R) Grades Pre-K–9
• Inventory of Early Development–II Birth–developmental age 7

**Developmental Delay:**
Coordinating Assessment and Programming for Preschoolers (CAAP)
Informal Checklists/Teacher Made Materials
Hawaii Early Learning Profile
Brigance:
• Infant & Toddler Screen Birth–23 months
• Early Preschool Screen–II—New Copyright! Ages 2 & 2 1/2
• Preschool Screen–II—New Copyright! Ages 3 & 4
• K & 1 Screen–II—New Copyright! Kindergarten & Grade 1
• Inventory of Early Development–II Birth–developmental age 7