

Applied Behavior Analysis (ABA) and the IEP

Guidance for Educational Decision-Making

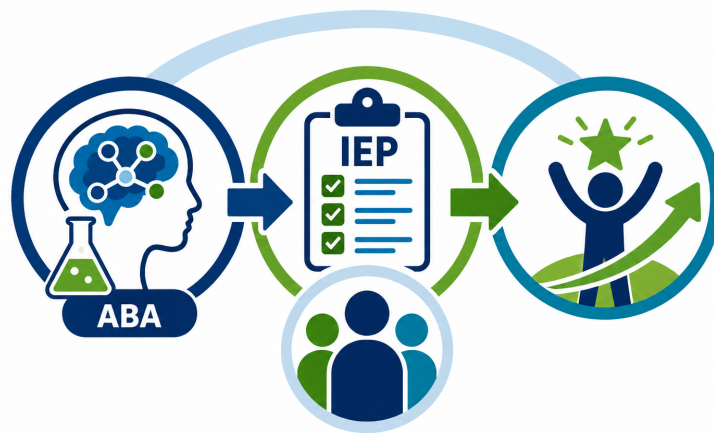


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What is Applied Behavior Analysis (ABA)?

Applied Behavior Analysis (ABA) may be one of many approaches used to support a student with behavioral, communication, social, adaptive, or functional needs. However, a diagnosis, recommendation from an outside provider, or a student's receipt of privately funded ABA services does not automatically mean that ABA is required as part of the student's educational program or IEP.

When discussing ABA in the educational setting, it is important to clarify what is meant by "ABA," as the term may be used in different ways. Understanding these distinctions can help IEP teams focus on the student's individual educational needs and determine what supports, strategies, or services are necessary within the school setting.

ABA Distinction	What it Communicates
ABA as a Science 	The systematic application of behavioral principles, such as reinforcement, prompting, generalization, and data-based decision-making, to support meaningful outcomes.
ABA as a Practice 	Evidence-based behavioral strategies and practices that may already be embedded within educational programming, including functional behavior assessment, task analysis, naturalistic teaching, skill development, and positive behavioral supports.
ABA as an Outside Service 	Clinical or therapeutic services provided outside of the educational program, often through an insurance-funded treatment plan. These services may inform the IEP team's understanding of the student but remain distinct from the IEP team's responsibility to determine the special education programs, services, and supports necessary for the student to receive an appropriate education.

IEP Team Considerations

When parents or outside providers make recommendations related to ABA services, the IEP team should consider each request through the individualized IEP decision-making process. The following are common situations IEP teams may encounter, along with key considerations for determining whether and how the student's educational needs may require changes to the IEP, including the student's services, supports, programming, placement, or length of the school day.

IEP Consideration #1

Parent or Outside Provider Request for ABA Services in the School Setting

When a parent requests that an outside ABA provider deliver services to a student during the school day, the IEP team should consider the request within the context of the district's responsibility to provide FAPE. The IEP team should meaningfully consider information and recommendations from the parent and outside provider, but an outside provider's recommendation does not determine what services must be included in the IEP or who must provide them. The IEP team is responsible for determining, based on the student's individual educational needs, the specially designed instruction, related services, supplementary aids and services, behavioral supports, and other supports necessary for the student to receive FAPE.

In considering ABA as a science of learning and behavior, it is important to recognize that many ABA principles and practices may already be embedded within the IEP process and incorporated into a student's educational program to address behavioral, communication, social, functional, or learning needs.

For example, the IEP team may consider conducting a functional behavioral assessment (FBA), developing or revising a positive behavioral intervention and support plan, identifying function-based interventions, using systematic instruction, reinforcement, prompting, task analysis, data collection, progress monitoring, or providing consultation and training to staff. When these or other supports are necessary for FAPE, it is the district's responsibility to ensure they are appropriately identified, provided, and monitored through the student's educational program.

The request for an outside ABA provider to deliver services during the school day should therefore be considered separately from the question of whether the student requires behavioral supports or ABA-based practices to receive FAPE. A student's need for behavioral intervention does not, by itself, establish a need for an outside ABA provider to deliver that intervention during the school day. The IEP team should first determine what the student needs educationally, and then determine the programs, services, supports, personnel, and setting necessary to address those needs.

As part of this determination, the IEP team should consider the student's evaluation information, behavioral and functional data, progress toward IEP goals, current supports and interventions, response to those supports, and relevant information provided by the family and outside professionals. If the district can appropriately address the student's educational needs and provide FAPE through the IEP, IDEA does not require the district to permit an outside provider to deliver a separate treatment program during the school day simply because that service has been recommended or is available outside of school.



What does this student need educationally to access, participate, and make meaningful progress, and how will the district ensure those needs are addressed through the student's IEP?

IEP Consideration #2

Parent or Outside Provider Recommendation for a Shortened School Day

Students with disabilities should have access to the same educational opportunities as their nondisabled peers, with the individualized supports and services necessary to participate and make progress. A student's school day should not be shortened solely to accommodate privately provided ABA or another outside therapy or service.

A full school day with access to instruction, peers, and the broader educational experience should be the starting point for students with disabilities. A shortened school day reduces a student's access to educational opportunities and may result in a more restrictive educational experience. Therefore, any decision to shorten the school day must be individualized, based on the student's documented educational needs, and determined by the IEP team to be necessary for the student to receive FAPE.

A shortened school day should not be based on provider schedules, therapy availability, funding requirements, administrative convenience, or a preference for outside services during the school day.

A shortened school day should be considered only when the IEP team determines, based on individualized data, that it is necessary due to the student's disability-related needs, such as significant medical, health, or psychological needs, and not simply to accommodate outside services.

Because reducing the school day limits access to instruction, peers, and educational opportunities and may create a more restrictive educational experience, the IEP team should first consider and implement additional or more intensive support and services designed to enable the student to participate in a full school day in the least restrictive environment. Before reducing a student's school day, the IEP team should first consider whether additional, different, or more intensive supports and services, including those outlined below, could enable the student to successfully participate in and benefit from a full school day in the least restrictive environment.

- Specially designed instruction;
- Positive behavioral interventions and supports;
- Supplementary aids and services;
- Related services;
- Environmental supports;
- Communication supports;
- Supplemental adult support or consultation; or
- Program or placement options

IEP Consideration #3

Parent or Outside Provider Recommendation for Students Not Yet Attending

When there is reason to suspect that a student may have a disability and need special education and related services, the district should follow its Child Find and evaluation procedures. Information provided by parents, ABA providers, medical professionals, and other outside providers should be reviewed and meaningfully considered as part of the evaluation and IEP process.

The evaluation should be sufficiently comprehensive to identify the student's educational and functional needs and provide the information necessary for the IEP team to make individualized decisions regarding eligibility, goals, special education programs and services, supplementary aids and services, supports, and placement.

When a student has not yet attended school, the IEP team should also recognize that information regarding how the student will respond to the school environment, instructional expectations, peers, routines, transitions, and school-based supports may be limited.

The IEP team should avoid assuming that a student's needs in a clinical, home, or therapeutic setting will necessarily present in the same manner within an educational environment. Similarly, the intensity or type of services a student receives through a clinical or insurance-funded treatment plan does not, by itself, establish the type or amount of special education services the student requires at school.

The process should not begin with a predetermined decision that the student requires ABA, a shortened school day, a particular level of adult support, or a particular educational placement. Instead, the IEP team should determine the student's educational needs and identify the supports and services necessary for the student to access, participate in, and make progress in the educational environment.

When appropriate, the IEP team should consider whether the student can begin with access to the full school day and appropriate supports, while collecting data and monitoring the student's response to the educational environment. The IEP can then be reconvened or revised if school-based data demonstrate that additional, different, or more intensive supports or services are necessary.

Importantly, decisions regarding placement and the length of the school day should be based on the student's individual educational needs and the IEP, with consideration of access to the least restrictive environment, rather than being driven by the availability or scheduling of outside ABA services.

IEP Consideration #4

Parent or Outside Provider Recommendation for ABA Strategies/Supports Written into the IEP

Start by Clarifying What Is Being Requested

When a parent or outside provider asks for “ABA” to be included in the IEP, this creates an important opportunity for collaboration. Rather than beginning with whether the school will or will not provide ABA, the IEP team can first clarify what is meant by the request.

ABA may refer to the science of behavior, specific practices derived from that science, or services delivered by an outside ABA provider. These are not necessarily the same request.

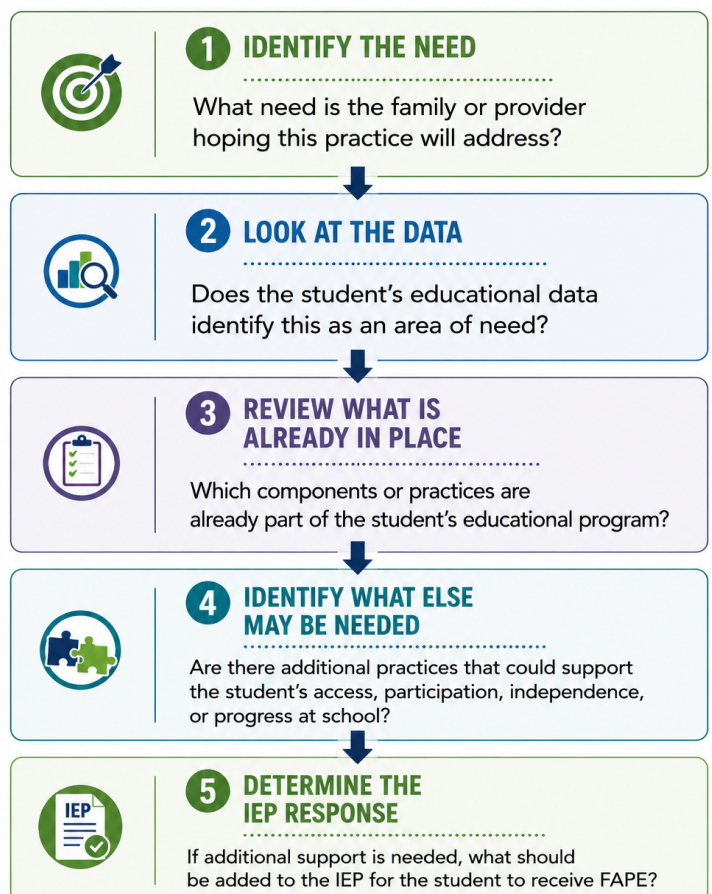
A carefully guided conversation can help the IEP team identify the specific practices or supports the family believes the student needs. For example, the family may be seeking:

- Functional Communication Training
 - Teaches a student an effective and accessible way to communicate needs that may otherwise be expressed through behavior.
- Naturalistic Environment Teaching -
 - Builds skills through naturally occurring activities, interests, and opportunities within the student's everyday environment.
- Systematic prompting and fading -
 - Provides intentional support to help a student learn a skill, then gradually reduces that support to build independence.
- Reinforcement-based teaching strategies -
 - Uses data to understand what is influencing behavior and develops individualized supports that address student needs, teach skills, and improve access and participation.
- Skill-Based Treatment -
 - Uses a structured, individualized approach to teach communication, toleration, and other skills that help students navigate challenging situations safely and successfully.
- Data-based decision-making or progress monitoring -
 - Uses ongoing data to determine whether supports are working and guide decisions about when to continue, adjust, or change them.

Move From the Label to the Student's Educational Needs

Once the specific practice or support being requested is understood, the IEP Team should shift the conversation from the label of ABA to the educational need the recommendation is intended to address. The Team can use the decision-making process shown here to connect the request to the student's educational data, consider what is already in place, and determine whether additional or different supports are necessary for the student to access, participate, and make meaningful progress.

The outcome of this process remains an individualized IEP Team decision. Information and recommendations from families and outside providers can meaningfully inform the discussion, but they do not independently determine the programs, services, supports, or methodology required by the IEP. The student's identified educational needs should drive what is ultimately included in the IEP.



Identify Who Can Implement the Support

If the IEP team determines that a practice derived from ABA is appropriate, the next question is not necessarily, “*Who will provide ABA?*” Instead, the IEP team can determine who can appropriately implement the identified practices within the student's individualized educational program.

Depending on the practice and the student's needs, implementation may involve a special education teacher, school social worker, speech-language pathologist, paraprofessional, behavior specialist, or other school-based staff.

The IEP team should then consider what those staff need to implement the practice effectively. This may include training, consultation, coaching, data systems, or other implementation supports.

The goal is not to debate whether ABA belongs in schools. It is to identify what the student needs, determine which practices can meet those needs, and build the school team's capacity to implement them effectively.

Additional IEP Team Considerations

The IEP Is Driven by Educational Need

The IEP team is responsible for determining the special education programs, services, supplementary aids and services, supports, and placement necessary for a student to receive a Free Appropriate Public Education (FAPE) in the Least Restrictive Environment (LRE).

Decisions must be based on the student's unique and individualized educational needs, using relevant evaluation data, school-based information, parent input, progress data, observations, and information from other relevant sources. When parents provide recommendations from ABA providers, medical professionals, or other outside providers, the IEP team should meaningfully consider that information as part of the individualized decision-making process.

Outside recommendations, however, should not be adopted automatically or viewed in isolation. The IEP team should consider how the recommendation relates to the student's educational needs, access to instruction, progress toward IEP goals, participation with nondisabled peers, independence, communication, behavior, regulation, and functioning within the school environment.

A recommendation for ABA services, a shortened school day, increased adult support, or a particular placement should prompt the IEP team to consider what educational need the recommendation is intended to address and whether that need can be appropriately addressed through the student's IEP. This may include consideration of additional or different special education services, supplementary aids and services, positive behavioral supports, communication supports, environmental modifications, staff supports, or other evidence-based strategies.

When a recommendation would reduce the student's access to the school day, instruction, or opportunities to participate with nondisabled peers, the IEP team should carefully consider whether the change is necessary based on the student's individual educational needs and whether additional or different supports could enable the student to participate successfully in a less restrictive option.

IEP TEAM DECISION-MAKING PROCESS

• from ABA Request to IEP Implementation •



Similarly, the type, frequency, or intensity of services included in a clinical or insurance-funded ABA treatment plan does not, by itself, establish what services are required within an educational program. Clinical recommendations may inform educational decision-making, but the IEP team remains responsible for determining what the student requires in the school setting to receive FAPE.

Ultimately, while recommendations from an outside provider can and should inform the IEP team's discussion and individualized decision-making, the IEP team remains responsible for determining the programs, services, supports, and placement necessary to address the student's educational needs and provide FAPE in the LRE.

Collaboration Matters

Families and outside providers bring valuable perspectives and information about a student's strengths, needs, communication, behavior, regulation, and strategies that have been successful across settings. Meaningful collaboration ensures that this information is welcomed, thoughtfully considered, and integrated with evaluation data, school-based information, and the expertise of the IEP team.

Collaboration does not mean automatically adopting an outside recommendation. Rather, it means bringing all relevant information and perspectives to the table, asking how they relate to the student's educational needs, and working together to make individualized decisions that support access, participation, progress, independence, and belonging.

Our goal is to recognize ABA as a shared science and thoughtfully integrate practices grounded in behavioral science into educational environments in ways that strengthen dignity, inclusion, meaningful participation, and student success, while keeping each student's individualized educational needs at the center of IEP decision-making.

The Kent ISD Special Education Department believes every student deserves an educational program designed to respond to their unique disability related needs through evidence-based practices, meaningful progress monitoring, and thoughtful implementation. The requirements of IDEA and the principles of ABA are often more alike than different, with both emphasizing individualized needs, meaningful goals, evidence-based support, and progress toward outcomes that matter. When students also receive ABA services outside of school, we have an opportunity to build bridges across settings rather than work in parallel. By bringing families, schools, and ABA providers together around shared priorities, we can learn from one another, value the unique expertise each team brings, and spend less time navigating differences and more time focused on student progress. Working together creates greater consistency, stronger support, and more opportunities to advance what matters most: student access, dignity, belonging, independence, and meaningful progress.

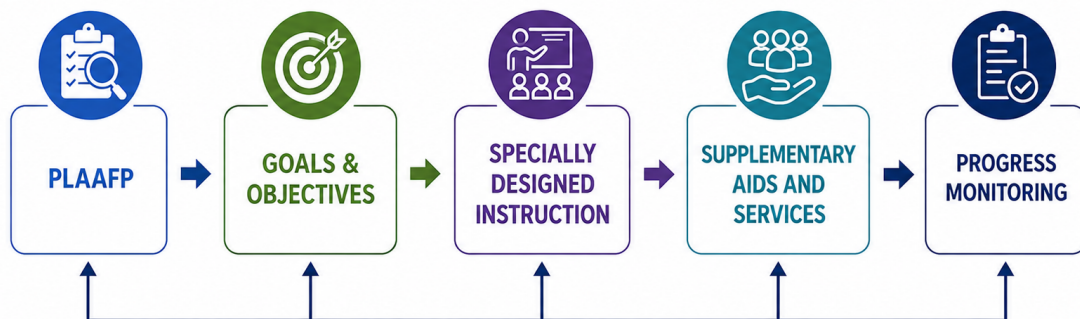
Collaboration Within the IEP

Information shared by families and outside ABA providers can provide valuable insight into a student's strengths, needs, learning characteristics, communication, behavior, and successful strategies. When relevant to the student's educational needs, this information can be meaningfully considered throughout the IEP development process. The goal is not to replicate a clinical ABA treatment plan within the school setting, but to consider what information, strategies, and data may help the IEP team design an effective educational program.

Present Levels of Academic Achievement and Functional Performance (PLAAFP)

Consider information that helps the IEP team develop a comprehensive understanding of the student's current strengths and needs.

- What assessments or data are being used in the home or clinical setting?
- What does the outside provider's data indicate about the student's current strengths and areas of need?
- How does the student learn most effectively?
- What recent accomplishments, emerging skills, or changes have been observed?
- Are there differences or similarities in how the student communicates, engages, regulates, or demonstrates skills across home, clinical, and school environments?



Supplementary Aids and Services (SAS)

Consider whether strategies or supports that have been successful in other settings may be relevant and appropriate within the educational environment.

- What evidence-based practices have been effective during home or clinic-based services?
- What visual, communication, sensory, behavioral, environmental, or instructional supports are being used?
- What strategies promote independence, participation, engagement, and generalization of skills?
- Are there supports that could be incorporated into the IEP to increase the student's access to instruction and participation with peers?

IEP Goals and Objectives

Outside provider information may help the IEP team better understand skills being developed across environments and identify opportunities for alignment and generalization.

- What communication, behavioral, social, adaptive, or functional skills are currently being addressed through ABA services?
- How are these skills measured and how is progress monitored?

- Are there skills that also represent an identified educational need and should be considered by the IEP team?
- How can school-based goals support the student's ability to generalize meaningful skills across people, settings, and activities?

Specially Designed Instruction (SDI)

Collaboration may also provide useful information as the IEP team determines the intentional adaptations to content, methodology, or delivery of instruction necessary to address the student's disability-related educational needs.

- What does explicit, intentional, and systematic instruction look like for this student?
- How are complex skills broken into smaller, teachable components?
- What prompting strategies are effective, and how are prompts systematically faded to promote independence?
- What reinforcement and feedback strategies support learning and engagement?
- How are skills practiced across people, environments, and activities to promote generalization?
- What data collection and progress-monitoring approaches can inform instructional decision-making?
- How can effective behavioral practices be incorporated into SDI while maintaining access to age-appropriate instruction, peers, and inclusive educational opportunities?

Effective collaboration creates opportunities for families, outside providers, and school teams to share what they know about the student, identify strategies that support success across environments, and promote consistency and generalization, while maintaining the IEP team's responsibility to determine the educational services and supports necessary for the student to receive FAPE in the LRE.

Prior Written Notice: Documenting the IEP Team's Decision-Making

When requests related to ABA services, outside providers, or shortened school days arise, the IEP team should work with the district Special Education Director to engage in a thoughtful, individualized discussion that considers parent input, provider recommendations, and relevant educational data. Prior Written Notice (PWN) provides an important opportunity to clearly document that collaborative decision-making process, including the options the IEP team considered and the reasons those options were or were not selected.

The examples below are intended to support IEP teams in developing clear, student-specific PWN language. They are not intended to serve as predetermined responses or standard reasons for denying a request. IEP teams should use only those examples that accurately reflect the options discussed, the information reviewed, and the individualized decisions made by the IEP team.

Option Considered	Possible Reason Not Selected
Parent request to shorten the student's school day to allow participation in privately provided ABA during school hours.	The IEP Team considered whether a shortened school day was necessary to address the student's unique disability-related needs and determined that it is not required at this time. The team determined that the student's needs should first be addressed through [identify the specific support, service, accommodation, modification, or specially designed instruction that will be implemented] to promote successful participation in the full school day in the least restrictive environment.
Add privately provided ABA as a service within the IEP.	The IEP team considered the recommendation and information provided by the family and ABA provider. Based on the student's educational data and identified needs, the team determined that the student's needs can be addressed through the specially designed instruction, behavioral supports, related services, and supplementary aids and services identified in the IEP. The team did not identify an educational need requiring privately provided ABA as an IEP service at this time.
Specify ABA as the required methodology for addressing the student's behavioral needs.	The IEP team considered the recommended ABA strategies and identified components that may be helpful within the educational environment. The IEP team determined that the IEP should identify the student's educational needs, goals, services, and supports without limiting implementation to a single methodology when the data do not demonstrate that one specific methodology is necessary for FAPE.
Allow the outside ABA provider to deliver services during the school day.	The IEP team considered the request and the information the provider could contribute. The IEP team determined that the student's identified educational needs can currently be addressed through the student's school-based IEP services and supports. The IEP team will continue to collaborate with the family and consider relevant information from outside providers.

Option Considered	Possible Reason Not Selected
Modify the student's school schedule around the ABA provider's availability.	The IEP team considered the proposed schedule but determined that changes to the student's educational program should be based on the student's educational needs rather than the availability or scheduling needs of an outside provider.
Immediately add ABA or a shortened day while the student is undergoing an initial evaluation.	The IEP team considered the request but determined that additional evaluation information is necessary to identify the student's educational needs and determine eligibility and, if eligible, the appropriate special education programs and services. The IEP team did not want to predetermine services or placement before completing the evaluation and IEP process.
Maintain the student's current IEP without considering information from the ABA provider.	The IEP team determined that relevant information from the family and outside provider should be considered as part of the IEP process. The IEP team reviewed the information alongside school-based evaluation, progress, behavioral, functional, and classroom data when determining the student's educational needs and appropriate supports.