



# COMPREHENSIVE SPECIAL EDUCATION EVALUATION

## Comprehensive Special Education Evaluation: Why it Matters

### Overview

The Individuals with Disabilities Education Act (IDEA) requires special education evaluations to be sufficiently comprehensive to determine special education eligibility and identify the student’s educational needs, whether or not commonly linked to the disability category in which the student has been classified. (34 CFR 300.304). Comprehensive evaluations are conducted in a culturally and linguistically responsive manner; non-discriminatory for students of all cultural, racial, ethnic, socioeconomic and other backgrounds.

The purpose of the Wisconsin Comprehensive Special Education Evaluation Framework is to share a renewed focus on evaluation as a process of collecting and analyzing information about the whole student, with the ultimate goal of understanding the student’s unique educational needs. This framework can be especially helpful when reflecting on commonly used evaluation practices.

For example, the special education evaluation process often begins for a student because someone feels the student has a specific “type” or “category” of disability and makes a referral. While disability categories, or “labels” may help individuals understand general characteristics common to the category or may be an important and preferred way for individuals to identify themselves, labels fail to capture an individual’s unique strengths, assets, and abilities, nor do they adequately describe the extent of a student’s needs. The traditional labeling process also has a high potential for cultural and other types of bias. For more information about conducting culturally responsive special education evaluations and addressing systemic and racial referral and evaluation bias within an equitable MLSS, see the [Addressing Bias in a Comprehensive Special Education Evaluation section of this framework](#).

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## Changing Mindsets

Within a comprehensive evaluation framework, Individual Education Program (IEP) teams approach a referral for an initial special education evaluation or a request for a reevaluation with the whole student in mind, and with the ultimate goal of identifying the student’s unique strengths and needs. By focusing the evaluation process on exploring individual student “needs” rather than primarily on “labeling” the IEP team is better able to make the ultimate evaluation decision as to whether the student needs special education services as a result of a disability. For students found eligible for special education, a “needs” (vs. label) focus throughout the evaluation process can lead to the collection of valid and reliable (i.e. accurate) information about the student. Such information is critical not only to completing a nondiscriminatory evaluation, but also for developing individualized IEP goals and services to address a student’s disability-related needs, so the student can access, engage, and make progress in age and grade-level instruction, settings, and other school-related activities.

For students who are found not, or no longer eligible for special education, comprehensive evaluations that focus on student needs provide information that school staff can use to support the student’s education without special education services, including students who are eligible for protection under Section 504 of the Rehabilitation Act.

The following guidance was developed to help IEP teams foster a “needs” based mindset based on the following prompt question:

*What are potential differences in outcomes when a special education evaluation is guided by a comprehensive “need” focus vs. more traditional disability category “label” focus?*

The chart is organized around the stages of the comprehensive evaluation process: Start, Plan, Implement, Complete. Within each section there are questions to help IEP team members think about the perspective they are using while conducting a special education evaluation. Also see [Comprehensive Evaluation Overview and Framework](#) for additional information and links to required [sample forms](#) used during the evaluation process.

**Prompt Question:** What are potential differences in outcomes when a special education evaluation is guided by a comprehensive “need” focus vs. more traditional disability category “label” focus?

## Start the Evaluation

Comprehensive Evaluation (Need Focus)	Disability Category Evaluation (Label Focus)
<p>Initial</p> <ul style="list-style-type: none"> <li>● What concerns are described in the referral?</li> <li>● What IEP team members should be assigned to learn and share more about this student; what expertise is likely to be needed?</li> </ul>	<p>Initial</p> <ul style="list-style-type: none"> <li>● What disability category fits with the referral?</li> <li>● What individuals generally serve on the IEP team when considering this disability category?</li> </ul>
<p>Reevaluation</p> <ul style="list-style-type: none"> <li>● Is there information the IEP team needs to help us better understand the student’s current disability-related needs or changing needs since the student was last evaluated?</li> <li>● Does the IEP team need to conduct a reevaluation because they need information beyond current IEP progress monitoring data, general education assessments, etc. to continue to address the student’s needs?</li> <li>● Has the student made so much progress that the IEP team believes they no longer need specially designed instruction and are no longer eligible?</li> <li>● What IEP team members should be assigned to learn/share more about this student; what expertise is likely to be needed?</li> </ul>	<p>Reevaluation</p> <ul style="list-style-type: none"> <li>● Should the IEP team waive the reevaluation because they know the student will continue to qualify in their disability category?</li> <li>● Should the IEP team conduct a reevaluation to make sure the student still qualifies for the student’s disability category?</li> <li>● Does the IEP team need a reevaluation because they think they need to add another disability category?</li> </ul>

**Prompt Question:** What are potential differences in outcomes when a special education evaluation is guided by a comprehensive “need” focus vs. more traditional disability category “label” focus?

### Plan the Evaluation

Comprehensive Evaluation (Need Focus)	Disability Category Evaluation (Label Focus)
<p>Review of existing data involves compiling existing information related to developmentally and educationally relevant questions to help identify what, if any, additional information is needed to determine eligibility and identify the student’s educational needs. <i>Note: The review is to help plan the evaluation and not to analyze findings to make eligibility decisions. The analysis of existing data and any new assessment findings are discussed during the evaluation meeting.</i></p>	<p>Review of existing data involves compiling existing information related to disability category to identify what information is needed to decide if the student meets disability category criteria.</p>
<p>Questions are broad, varied, and examine whole student:</p> <ul style="list-style-type: none"> <li>• What are the student’s strengths and assets?</li> <li>• What do the student’s difficulties look like?</li> <li>• Under what conditions does the student do well? What helps the student learn (<i>settings, people, content, expectations, teaching strategies, grouping, etc.</i>)?</li> <li>• Under what conditions does the student have difficulty? What makes it more difficult for the student to learn (<i>settings, people, content, expectations, teaching strategies, grouping, etc.</i>)?</li> <li>• Does the IEP team see concerns with all subjects, teachers, or learning environments?</li> <li>• Why is the student having difficulty meeting age or grade level standards and expectations?</li> <li>• Why is the student demonstrating or not demonstrating behaviors or having difficulty with (____)??</li> <li>• What does the IEP team know about the student in the six areas of strength and need?</li> <li>• Are there any mental health or social and emotional strengths or concerns?</li> <li>• What other questions does the IEP team have about this student? I wonder..?</li> </ul> <p>What information does the IEP team need to better understand the student and decide if the student has a disability that affects access, engagement, and progress in age or grade level general education curriculum, instruction, environments, and activities?</p>	<p>Questions are narrow, specific, and primarily focused on disability category criteria:</p> <ul style="list-style-type: none"> <li>• “I think the student has “disability category” ....do they meet the disability category criteria?</li> <li>• We need to conduct an “disability category” evaluation</li> <li>• The student isn’t meeting grade level standards....what disability do they have?</li> <li>• What do I/we have to do to get this student <i>into</i> special education?</li> <li>• Does the student meet the cut scores for “disability category?”</li> <li>• What information or assessments do I need to identify the students as (disability category)?</li> <li>• What test scores or data exists that might correspond to disability category criteria?</li> <li>• Does this student already have a diagnosis? If so, what?</li> </ul> <p>What disability category does the IEP team think applies and what data will the IEP team need to document so the student qualifies?</p>

## Plan the Evaluation (continued)

<p>Focus is on collective responsibility for problem-solving and decision-making, and on broad opportunity for student, parent, family, and educator input related to identifying strengths and needs:</p> <ul style="list-style-type: none"> <li>● What opportunities did educators provide for student and family voice and input on problem solving?</li> <li>● Has each IEP member had input into what information the team needs to understand the student better so they can understand the factors contributing to the “concerns?”</li> <li>● Does the IEP team have a well thought-out plan for completing an evaluation in a linguistically and culturally responsive manner that will provide sufficient, valid, and reliable information to apply disability category criteria, as well as identify the student’s educational needs?</li> <li>● Will our evaluation plan lead to answering the questions the IEP team has about this student?</li> </ul>	<p>Problem-solving and decisions about whether and what type of additional information is needed may be left to a single individual. <i>(This may limit engagement and important information from student, parent, family, and educators):</i></p> <p>What information does the IEP team need to identify the student with a (disability category label) and document that as a result, the student requires specially designed instruction?</p>
<p>Information gathered includes information that will help the team know what has worked in the past to support learning, as well as interventions that were not effective.</p> <ul style="list-style-type: none"> <li>● What learning opportunities, instruction, and interventions has the student had previously?</li> <li>● How has the student responded to previous interventions?</li> <li>● What current data has already been collected about a student’s present levels of academic and functional performance? Are there areas that do not have current data in which the IEP team thinks such data is needed?</li> <li>● Does the IEP team need to collect additional information or conduct additional testing?</li> </ul>	<p>Information gathered through the lens of what is needed to apply eligibility criteria and identify potential disability related needs typically associated with the category(ies) selected for focus.</p> <ul style="list-style-type: none"> <li>● What learning opportunities, instruction, and interventions has the student had previously?</li> <li>● How has the student responded to previous interventions?</li> <li>● What current data has already been collected about a student’s present levels of academic and functional performance related to areas of concern typically associated with the category under consideration? Are there areas that do not have current data in which the IEP team thinks such data is needed?</li> </ul>

**Prompt Question:** What are potential differences in outcomes when a special education evaluation is guided by a comprehensive “need” focus vs. more traditional disability category “label” focus?

### Implement the Evaluation Plan

Comprehensive Evaluation (Need Focus)	Disability Category Evaluation (Label Focus)
<p>Information is collected and organized as outlined in the evaluation plan (and forms IE-2, IE-3, RE-4, RE-5) in all relevant areas irrespective of disability category. <i>(This decreases the probability that something is missed.)</i></p> <ul style="list-style-type: none"> <li>● Is our evaluation plan answering the questions the IEP team has about this student?</li> </ul> <p>If new questions have arisen or the IEP team does not expect enough information will be collected to answer the questions they have about the student, does the IEP team need to adjust the evaluation plan and amend the notice and consent so they can gather the additional information needed to complete a comprehensive evaluation?</p>	<p>Information is collected and organized as outlined in the evaluation plan (and forms IE-2, IE-3, RE-4, RE-5) based on what is required to apply disability category criteria. <i>(This increases the probability that something important for identifying student needs is missed.)</i></p> <ul style="list-style-type: none"> <li>● Did the IEP team collect and assess everything included in the category criteria?</li> </ul>
<p>Assessments and other information are interpreted in terms of “what this means for this student.” Each individual who administers assessments or collects or compiles other information asks themselves the following questions:</p> <ul style="list-style-type: none"> <li>● Is the IEP Team conducting the evaluation in a culturally and linguistically responsive manner and interpreting results based on the student’s and family’s culture, ethnicity, and home language?</li> <li>● How does information collected help identify the student’s needs?</li> <li>● How does the student’s performance, behavior, etc. compare to age and grade level standards and expectations?</li> <li>● Is the IEP team collecting information that addresses concerns or skills the parent feels is important?</li> <li>● If and how does a history of trauma affect assessment findings?</li> </ul> <p>Is the IEP team considering all available information?</p>	<p>Assessments and other information is interpreted in terms of “does this meet the disability category criteria.” Information collected during the evaluation that doesn’t fit the disability category criteria may be ignored or left out.</p> <ul style="list-style-type: none"> <li>● Does the IEP team have the information needed for documentation on the disability category criteria form?</li> <li>● If the student performs a “skill” sometimes or enough to meet criteria, the skill may not need to be addressed.</li> <li>● How does or does not a history of trauma fit into the disability eligibility criteria?</li> </ul>

**Prompt Question:** What are potential differences in outcomes when a special education evaluation is guided by a comprehensive “need” focus vs. more traditional disability category “label” focus?

## Completing the Evaluation

Comprehensive Evaluation (Need Focus)	Categorical Evaluation (Label Focus)
This step includes the IEP team evaluation meeting and development of the evaluation report.	This step includes the IEP team evaluation meeting and development of the evaluation report.
Decisions about special education eligibility and educational need use a “whole student” inquiry approach focused on identifying student strengths and needs “whether or not commonly linked to a particular disability category.”	Special education eligibility and decisions about student needs are focused on applying disability category criteria for likely category(ies) predetermined at time of referral.
IEP team discussion of evaluation findings and consideration of eligibility is driven by a clear understanding of the nature and effects of a student’s potential or continuing disability on access, engagement, and progress in age or grade-level curriculum, instruction, environments, and other activities. Analysis of existing and new information focuses on the <a href="#">Six Areas of Academic and Functional Skill</a> . Developmentally and educationally relevant questions generated during evaluation planning are revisited and help guide discussion and decision-making during the IEP team meeting. Efforts are made to ensure parental engagement in all aspects of the meeting.	IEP team discussion of evaluation findings and consideration of whether a student is eligible for special education is driven by disability category criteria elements. Information from existing and new information is considered and student needs are discussed during the meeting. Educational needs documented in the evaluation report are likely to be category specific. Specific strengths and disability related needs helpful for IEP development may have to be inferred from the final evaluation report.
The decision about a student’s need for special education is explicit and embedded throughout the team’s consideration of eligibility or continuing eligibility.	Need for special education is considered in terms of available general education options and educator experience with students with the same disability category. If the student is found eligible or continues to be eligible, identified disability related needs may be limited to the findings applied to categorical criteria.



## Completing the Evaluation (continued)

### Evaluation Meeting

- What are the answers to our educationally relevant questions given the data and information the IEP team has collected and compiled?
- What does assessment data mean in terms of grade or age level expectations?
- How does new data and information compare to existing data and information?
- Are there patterns or inconsistencies across information that the IEP team needs to discuss further?
- Are there any factors that may have affected student assessment performance that lead us to question the reliability and validity of any data (including, but not limited to cultural or linguistic factors, systemic bias, and assessment bias)? If so, how should the IEP team interpret findings?
- Are educators engaging the parent in the discussion and analysis? Is the discussion about analysis and findings understandable to all IEP team participants, including parents?
- What does the evaluation information mean in relation to disability category criteria?
- What do the findings from assessments and other information mean in relation to effects on the student's access, engagement, educational progress, and need for special education?
- How has the student responded to prior intervention? What does data and other information collected tell us about needs that have previously been addressed?
- What are the current individual and unique disability-related needs of the student that should be addressed with IEP goals and/or services?
- Is there anything else the IEP team has learned about this student that will be helpful for IEP development or review and revision (if eligible) or for making decisions about general education options within the school's MLSS (if student is not, or no longer eligible) including protection under Section 504, if eligible?

### Evaluation Meeting

- What are the assessment data? What scores are average, below average, significant, not-significant as compared to norms?
- How do the findings from information the IEP team collected fit into the eligibility category criteria being considered?
- Does this student show disability-related needs typical of students with this disability category? What are some examples of this student's individual needs?
- Does the student meet eligibility criteria for the category(ies) under consideration?
- Does the student need special education services? If so, what needs are typically addressed by services for students with this disability category that are consistent with this student's needs?

## Completing the Evaluation (continued)

### Evaluation Report

The evaluation report clearly describes the reason the student meets or does not meet special education eligibility criteria and identifies the student's strengths and needs irrespective of the disability category in which the student is identified. The report provides sufficient data about current performance in relevant academic and functional skill areas and includes information useful for IEP development. It includes documentation of how the disability affects access, engagement, and progress in age or grade-level curriculum, instruction, environments, and activities (effects of disability) and identifies disability related needs in terms of academic and functional skills the student needs to develop or improve access, engagement, and progress in general education.

- What information does the IEP team need to include in each section of the evaluation report form?
- What evidence must be included to support our eligibility decision?
- What analyses, summaries, or other documentation of our meeting discussion and decisions does the IEP team want to be sure to include in the evaluation report?
- What information must be included about the effects of the student's disability and disability related needs that will be helpful for IEP development?
- If the student was found not or no longer eligible under IDEA, what information should the IEP team communicate that will be helpful for general educators who will continue to support the student's learning? [This may include information related to the decision that the student is eligible for protection under Section 504 of the Rehabilitation Act.]

### Evaluation Report

The evaluation report documents the IEP team's eligibility decisions and summarizes the reason the student meets or does not meet disability eligibility criteria and needs or does not need special education. The report provides sufficient information about current performance related to category specific areas of potential need. Supporting data related to the effect of disability and disability related needs are likely to be limited to those used to apply category specific criteria. Effects of disability and disability related needs may need to be inferred. Information about all of a student's disability related needs useful for IEP development may be embedded in individual evaluator's reports (if written and shared) or shared during individual evaluators summaries during the IEP team meeting and may not be explicitly documented in the body of the main evaluation report.

- What information does the IEP team need to include in each section of the evaluation report form?
- What evidence must be included to support our eligibility decision?

## **After the Evaluation: IEP Development and Other Outcomes**

For students found initially eligible or who continue to be eligible, development of annual IEP goals and special education services (i.e. specific types, amounts, frequency, and duration of services) is procedurally not part of the evaluation process but happens following the eligibility determination. It is possible for the student's same IEP team to continue meeting to develop, or review and revise an IEP immediately following an initial evaluation or reevaluation, as long as appropriate notice and procedural requirements are followed. More often, an IEP team meeting to develop or review the student's IEP is held sometime after the evaluation meeting, and sometimes with different or additional IEP team participants. In all cases, an IEP team meeting to develop an initial IEP or review and revise (as appropriate) and eligible student's IEP must be held within 30 days following an initial evaluation or reevaluation.

Readers are encouraged to refer to guidance on developing [College and Career IEPs](#) for more information on this topic.

## After the Evaluation: IEP Development and Other Outcomes (continued)

Comprehensive Evaluation (Need Focus)	Disability Category Evaluation (Label Focus)
<p>IEP goal and service decisions are based on deeper discussion of effects of disability and unique disability-related needs.</p>	<p>IEP goal and service decisions are generally made within the context of those typically included in the IEPs of students identified with the same category of disability (i.e. label) (e.g., all students with SLD participate in Wilson Reading Program).</p>
<p>If the student is found eligible or continues to be eligible for special education services, the initial or revised IEP addresses the student's unique disability-related needs in any of the Six Areas of Academic and Functional Skill identified during the evaluation. Goals and services address disability-related needs, irrespective of the student's identified disability category (i.e. label). Identification of all disability-related needs, irrespective of label, during an evaluation leads to IEP goals and alignment of IEP services that have the greatest likelihood of addressing the effects of the student's disability and their access, engagement, and progress in age or grade-level general education curriculum, instruction, environments and other school activities. A broad range of special and general educators and specialists may be involved in coordinating IEP development and implementation.</p>	<p>If the student is found eligible or continues to be eligible for special education services, the initial or revised IEP focuses primarily on disability-related needs, typically associated with the disability category label in which the student was identified. IEP goals and services may be limited to addressing category specific needs explicitly or implicitly identified during the evaluation. A narrow range of special and general educators who generally work with students with the same categorical label may be involved in coordinating IEP development and implementation.</p>
<p>If the student is found not, or no longer eligible, information collected during the evaluation related to student needs is explicit and provides clear recommendations that may be addressed with other services within the school's equitable MLSS (e.g. 504 plan, tiered general education supports and interventions).</p>	<p>If the student is not, or no longer eligible, general education recommendations for addressing student needs may be limited to what can be inferred from information documenting whether the student meets disability category criteria. Substantive discussion with evaluators following the evaluation meeting may be needed to get more explicit recommendations to address with other services within the school's equitable MLSS (e.g. 504 plan, tiered general education supports and interventions).</p>



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