SPECIAL EDUCATION GUIDANCE

Functional Behavioral Assessments

Introduction and Overview

The term Functional Behavioral Assessment, or FBA, is widely used across clinical and educational settings. FBAs were first developed by the field of Applied Behavior Analysis (ABA) as a clinical method for analyzing how behaviors are functionally related to an individual's environment in which the behavior occurs. FBA is supported by research that suggests that the environment, and especially the people in the environment, either reinforce those behaviors so that the behaviors continue to occur in the future, or the individual escapes the environment that the individual finds aversive. Applied Behavior Analysis, on the other hand, is a process that controls the variables and tests hypotheses about environmental factors that influence an individual's behavior through the application of Functional Analysis.

While a functional analysis manipulates or changes the environment to observe the effects on an individual's behavior, an FBA involves observing behavior in the individual's natural environment. An FBA is a multi-step process that may involve functional analysis and includes collecting data from multiple sources that results in a hypothesis of "why" an individual is engaging in a behavior. If the hypothesis about the function (or purpose) of a behavior is correct, it can lead to ideas for new skills or strategies that can be taught (replacement behaviors), as well as ideas for how to more effectively respond to the individual when the behavior occurs.

In special education, FBAs are used as both an assessment and to inform instructional strategies to ensure a student receiving special education services through an Individualized Education Program (IEP) can access, engage, and make progress in age- and grade-level curriculum, instruction, environments, and activities. FBAs can be used to help meet multiple requirements under the Individuals with Disabilities Education Act (IDEA) including, but not limited to:

- identifying all of a student's special education and related services needs, whether or not commonly linked to the disability category in which the child has been classified, (IEP and evaluation requirement),
- how a student's behavior impedes the student's learning or the learning of others, (IEP requirement),

- using technically sound instruments that may assess the relative contribution of cognitive and behavioral factors, in addition to physical or developmental factors, (evaluation requirement),

- If the district, the parent, and relevant members of the IEP team make the determination that the student's conduct was a manifestation of the student's disability, the IEP team must either conduct an FBA (unless the LEA had conducted a previous FBA) and implement a behavior intervention plan (BIP) for the student. If a BIP has already been developed, the IEP team must review the BIP, and modify it as necessary to address the behavior (Information Update Bulletin 14.02: Manifestation Determination).

FBAs may be used to help clearly define and understand any behavior that interferes with a student's learning or the learning of others. The goal of an FBA is to identify the function and underlying root cause of the behavior(s) in order to develop a plan for adults to better support the student's academic and functional needs. Decades of research have established that FBAs are an evidence-based, high-leverage practice that can improve student outcomes in educational settings. The use of FBAs is included in the IDEA as a required process to address specific circumstances related to disciplinary change of placement.

In 2024, The Office of Special Education and Rehabilitation Services (OSERS) provided guidance stating that "FBAs should be utilized more frequently than currently used to understand behaviors that interfere with learning and inform appropriate instructional strategies or interventions." OSERS also stated that "there are important benefits to conducting FBAs…for students with and without disabilities."

For students with or suspected of having a disability, consent would be required for a particular child if:

- the FBA is one of the assessment tools and strategies conducted as part of an initial evaluation or reevaluation under IDEA, or

- the FBA, along with a review of additional data, is used as an initial evaluation or reevaluation under IDEA. (OSERS, 2024)

It is important to note that the following guidance will provide technical and best practice assistance for conducting FBAs for students with or suspected of having a disability under IDEA. However, in acknowledging that social, emotional, and behavioral functioning can interfere with learning for many reasons not related to a disability, some of the information provided within this guidance can also be applied as best practice strategies for all students when addressing behaviors that interfere with learning.

The Evolving Way Behavior is Understood and Addressed in Education

Our individual and collective understanding of "behavior" continues to evolve over time. One of the challenges of consistently addressing the behavioral needs of students across educational environments is the vast difference in how educators have been socialized and educated to proactively address (prevent) and respond (intervene) to behaviors that interfere with a student's learning or the learning of others.

Moving Beyond The Four Functions of Behavior

Traditionally, the goal of an FBA was to identify the function of a behavior and develop an intervention plan to extinguish and replace the behavior. Although there have been various interpretations, the four most commonly referenced functions of behavior are attention-seeking, escape or avoidance, access to tangibles (gain something), and sensory stimulation. These four functions of behavior came out of numerous research studies conducted in controlled settings.

In educational contexts, interventions were often narrowly targeted at one or more of the four hypothesized functions of behavior. For example, in the past, the function of behavior was addressed with fairly consistent and prescribed interventions. This included strategies such as withholding reinforcement (e.g., planned ignoring) of the behavior or extinguishing sensory-seeking behavior. Although these interventions may have shown outcomes in a clinical or research context, within an educational context these could serve to escalate behaviors and create a response cycle leading to punishment, use of seclusion or restraint, disciplinary removals, or new or different behaviors that interfered with a student's learning.

Moving Beyond Replacement Behavior

Another common intervention and support used within educational contexts to address the function of behavior included identifying a replacement behavior to take the place of the behavior interfering with the student's learning or the learning of others. The thought was that in understanding the function, the intervention plan could be developed to include a replacement behavior that was more acceptable and that served the same purpose or function as the less desirable behavior. For example, if a student was perceived to be escaping from an undesired activity by disruptive or harmful behavior, the student was taught to use a break card to temporarily escape the undesired activity. Another example is the replacement of a self-stimulatory behavior that was perceived as stigmatizing with one that was more socially acceptable, such as using a fidget to replace hand flapping or pacing. Although identification of a replacement behavior is often successful to address very consistent and specific types of behavior, it may not address the root cause(s) of why a student is behaving in a certain way. In addition, educators may be too eager at times to replace a behavior that is perceived as undesirable but serves a student's need for safety, regulation, communication, or other basic needs that do not need to be replaced.

Moving Toward Understanding Root Cause

Educators increasingly recognize that behaviors are complex and not as simple as what is observed from the outside. Addressing behavior in natural settings (such as school) is not the same as doing so in a clinical or research environment. More and more educators are moving beyond thinking of behaviors as simple stimulus-response reactions; i.e., students solely act in a certain way to get something, to get out of something, or to gain attention. They understand that behavior is a form of communication; that a person's behavior is a signal of their sensory or emotional state. Subsequently, instructional frameworks are following suit.

Behaviors, whether we perceive them as positive or negative or desired or undesired, do not occur in a vacuum. Instead, they occur within an individual's environment and experiences. Behavior is a response to those events and experiences. One's behavior communicates to others what the individual is thinking or feeling. It may communicate an unmet need, an emotion the student cannot yet identify or manage, missing or undeveloped skills, or that an expectation exceeds the student's capacity. The goal, then, of an FBA is not just to identify the function of behavior. It also helps those who conduct FBAs to gain an understanding of the environment and context surrounding the behavior as well as to identify the underlying root cause of the behavior. These insights are then used by school staff to develop a plan to better support and meet the student's needs, and not solely to replace or change a student's behavior.

With the goal of understanding function **and** root cause, those administering the FBA collect data not only about the student's actions and responses but also about the wider context of the systems in and around schools and how they interact with each other and with the student. Understanding the effects of the learning environment, relationships, and systems on the student who is demonstrating behaviors that interfere with their learning or the learning of others is a vital component of a meaningful and educationally relevant FBA. The data collected needs to reflect a broader view and include data from the instruction, curriculum, environment, adult support and relationships, as well as the learner.

With this understanding and vantage point, adults are better able to meet a student's needs by creating a safe and supportive environment and by teaching, practicing, and reinforcing new skills for social and emotional growth. The IEP team can use the data collected during an FBA to create a plan that addresses the student's unmet needs, missed learning or skills, or other needs that require changes to the adults' approach, environmental changes, or instructional strategies or other support. In short, the FBA provides information critical to students' access, engagement, and progress in their education. In addition, by understanding the function and root cause of a student's behavior through both educational and ecological lenses, educators can gather better assessment information to create a more effective IEP. This should also lead to more effectively meeting the student's needs within the school's equitable multi-level systems of support, which include culturally responsive practices, universal design for learning, comprehensive school mental health systems, trauma-informed schools, and social and emotional learning.

To better understand function and root cause, many schools and educators now utilize models of human development, neuroception, brain and body states, and relational practices to support adult and student needs. Teams recognize that internal or external stimuli influence behavior and are looking beyond "behaviors" to consider the stress response and the student's activated fight, flight, freeze, or fawn response. Some school teams engaged in the TRAIN-WI Program which provided training to educators using Dr. Bruce Perry's Neurosequential Model in Education (NME) program. More information can be found on the Neurosequential Model in Education webpage. Additional learning can be found in Dr. Lori Desautels' book *Connections Over Compliance: Rewiring Our Perceptions of Discipline*, the book from Julie Causton and Kate Macleod *From Behaving to Belonging: The Inclusive Art of Supporting Students Who Challenge Us*, and Dr. Mona Delahooke's book *Beyond Behaviors: Using Brain Science and Compassion to Understand and Solve Children's Behavioral Challenges*. These resources are offered as suggestions, and should not be seen as an endorsement.

Additional learning can also be found in the Inclusive Strategies to Address Behavioral Needs of Students with IEPs.

"Of the two people in the equation, student and the adult,
the one most likely able to change their behavior is the adult."
Hugh Davis, WI Family Ties

Related Systems that Support a Meaningful and Educationally Relevant FBA

Understanding the impact of the learning environment and school-wide systems on a student who is demonstrating behaviors that interfere with their learning or the learning of others is a vital outcome of a meaningful and educationally relevant FBA. An FBA and the resulting interventions and supports will be more effective within an educational system structured to meet the needs of all students. Below are brief descriptions of some of the major systems and practices that have a significant impact on student success.

1. **Wisconsin's Framework for Multi-Level Systems of Supports** (WiMLSS)**:** Implementing a multi-level systems of supports means providing services, practices, and resources for each and every learner based upon responsiveness to effective instruction and intervention. In this system, high quality instruction, strategic use of data, and collaboration interact within a continuum of supports, starting with a strong universal level, to ensure learner success. Schools provide varying types of supports at differing levels of intensity to proactively and responsively adjust to the needs of the whole child. These include the knowledge, skills, and habits learners need for success beyond high school, including developmental, academic, behavioral, social and emotional skills. For more information go to the Wisconsin's Framework for Multi-Level Systems of Supports webpage.

2. **Culturally Responsive Problem Solving:** Problem-solving teams ensure that learning opportunities are strengthened for every student. By understanding how to problem-solve within the diverse cultural context of schools, educators should

recognize cultural differences are a factor in how we perceive and understand human behavior and functioning. Cultural differences are generally viewed as group-level differences that are borne out of a group's traditions, beliefs, and norms. Cultural beliefs can influence educators' perspectives on behavior, academic performance, mental health, or other concerns (Murrell, 2007). For more information, go to the Culturally Responsive Problem Solving webpage.

3. **Universal Design for Learning (UDL):** Universal Design for Learning principles help ensure learning is accessible, engaging, and effectively assessed based on each student's individual needs. By proactively designing academic environments and experiences from the beginning, **each and every** student gains knowledge, skills, and enthusiasm for learning. UDL is not a special education initiative or a regular education initiative: it is an every-child initiative. For more information, go to the Universal Design for Learning webpage.

4. **Wisconsin School Mental Health Framework:** This framework provides guidance to build and strengthen a comprehensive school mental health system. It focuses on ages 3-21 and links with the "Systems of Care" philosophy. Trauma sensitive schools and social and emotional learning are components of this system of supports. For more information, go to Wisconsin's School Mental Health Framework.

5. **Trauma Sensitive Schools:** Supportive school environments and positive relationships with adults within the school setting can empower trauma survivors to flourish and learn to their potential. Schools can build on these efforts by providing universal, selected, and targeted strategies that emphasize strengths and address the educational needs of students who have been affected by trauma. For more information, go to Mental Health - Trauma Sensitive Schools.

6. **Social and Emotional Learning (SEL):** Making SEL skills part of the learning equation helps children succeed in school and life. With social and emotional skills, children can manage their feelings, build healthy relationships, and navigate social environments. When adults are supported by effective policies and training, children develop the skills needed to prepare them for the world. For more information, go to Social and Emotional Learning.

7. **Comprehensive Special Education Evaluation (CSEE):** The Wisconsin comprehensive special education evaluation framework provides 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. IEP teams can use the Six Areas of Academic and Functional Skill to identify all of the student's needs, whether or not commonly related to the student's disability category. For more information on CSEE, go to the Comprehensive Special Education Evaluation webpage. For additional information on the Six Areas, go to the Comprehensive Special Education Evaluation: Six Areas of Academic and Functional Skill webpage.

Part of the CSEE resource material includes research-based guidance on how to identify and reduce bias in the special education evaluation process, as well as providing strategies on how to recognize and harness the strengths, assets, and competence of all students so they can graduate from school, college, career, and community ready. For more information, go to the Addressing Bias in Comprehensive Special Education Evaluations webpage.

8. **College and Career Ready IEPs:** For all students ages 3 through 21 who require special education services, the IEP supports access, engagement, and progress in academic and functional skills. In this way, the IEP is key to helping such students develop the knowledge, skills, and habits that will allow them to succeed in life after high school. For more information, go to the College and Career Ready IEP webpage.

9. **Supporting Neurodiverse Students Professional Learning System (SNS):**

The SNS provides statewide and district-level technical assistance, which includes consulting, coaching, professional learning, and resource brokering to educators, families, and community organizations that support students with Individualized Education Programs (IEPs) who have neurodiverse needs. The SNS provides in-person and virtual professional learning opportunities, coaching, and consulting to meet the needs of educators as they develop positive behavioral interventions and support for students with IEPs whose behaviors interfere with the student's learning or the learning of others.

The SNS also provides targeted support to school teams engaged in three-year systems change grants or one-year intensive grants, known as the Enhancing Social and Emotional Skills in Students with IEPs (ES3). The ES3 support embeds coaching, training, and resources to implement evidence-based improvement strategies matched to student needs and make connections to existing district-level initiatives and continuous improvement plans. For more information, go to the SNS webpage.

Reflection and Discussion Activities

1) How does this introduction and overview to FBAs either reinforce or change your views of what an FBA is and the purpose of FBAs within an educational context?

2) Read the section on the evolving ways behavior is understood and addressed in education, then reflect on these questions:

    a) How were you socialized or taught to think about *how* to understand and address "behavior" that interferes with learning or the learning of others?

    b) Which, if any, of the ways described are you most familiar or comfortable with, and which are you less familiar or comfortable with (e.g. four functions of behavior, replacement behavior, behavior as communication, root cause, and broader ecological context)?

    c) What are some major strengths, deficits, or barriers for each of the FBA processes described in this section?

d) Are there any major ways to think about either "behavior" or functional behavioral assessment that you believe are missing from this introduction?

3) Read the section on related systems that support a meaningful and educationally relevant FBA, then reflect on these questions:

   a) Which of these related systems are school teams using in your school or district?

   b) How well do you feel you are connecting the FBA process to existing systems of support used in your school or district?

   c) How might you improve how your existing systems of support are connected to the FBA processes used in your school or district?

   d) If applicable, how might other systems of support not listed in this introduction be used to improve your school or district's processes for conducting FBAs?

   e) Which of these systems of support would you prioritize to integrate into your process for conducting FBAs?

Wisconsin Department of Public Instruction
Division of Learning Support, Special Education Team
Eva Shaw, Education Consultant
201 West Washington Avenue
Madison, WI 53703
(608) 266-7475
eva.shawl@dpi.wi.gov

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