



## FBA confusion: Who does what, when, and how?

A [functional behavioral assessment](#) is a process designed to uncover the purpose behind a student's problem behavior. It frequently occurs after an MDR team determines that a student's conduct that gave rise to a change in placement was a manifestation of her disability. [34 CFR 300.530](#) (f).

As with the definition of FBA, the IDEA does not explicitly identify which staff member must conduct an FBA. While it may appear to be a free-for-all, allowing an unqualified staff member to conduct an FBA has serious implications. These implications include running afoul of applicable state law requirements, fielding potential parent [independent educational evaluation](#) requests, and having insufficient data to develop an appropriate IEP, which can collide with FAPE obligations, said Julie Reznik of Shipman & Goodwin LLP in Hartford, Conn.

Dive into the nitty-gritty of an FBA, including how to identify the professional best suited to conduct the FBA and the responsibilities he must carry out.

### Who should do it?

Like the IDEA, OSERS also hasn't specified who must conduct an FBA. Some state laws may require certain individuals, said Reznik. It's important to review state law for any specific requirements that may apply to your district, she said.

"If it's not addressed by state law, then it's a decision left to school districts," said Reznik. "I think it's important for the district to ensure that the person is appropriately qualified and has received adequate training in the type of data collection and analysis involved in an FBA."

Qualified professionals can include Board Certified Behavior Analysts, school psychologists, [school social workers](#), and special ed teachers, explained Reznik. However, some BCBA's might require parent consent to move forward with the FBA because their certifying agency requires it; this is dependent on jurisdiction, said Reznik.

Regardless, the person who conducts the FBA is determined on a case-by-case basis, she said. For example, one student might need a team approach, while another might just need a BCBA, Reznik said. Factors like staff availability and time constraints must also be considered when conducting an FBA, she added.

## What data should be collected?

Reznik said with FBAs, districts want to understand the target behaviors, how often the conduct occurs, and the [antecedents](#). In other words, determine what is prompting the behavior, which can be gleaned from student observations, she said. *See Redding Bd. of Educ., 118 LRP 46831* (SEA CT 10/29/18) (Classroom observations and collection of data about what preceded and followed the behaviors helped establish why the student engaged in them and make suitable recommendations for revising the IEP to better address the conduct.).

This helps identify interventions that might work for a particular student, with the goal of reducing the undesired behavior going forward, Reznik said.

## How should it be done?

The appointed staff member who conducts the FBA has several responsibilities. Reznik said they must ensure that target-specific behaviors, such as those that interfere with the student's learning or the learning of others or that result in removal from class, are documented. Information about these behaviors should be [collected](#) over several days in various settings, at different times of day, and during a variety of activities to ensure a holistic view of the behaviors and a complete understanding of the student, she said. That professional must also document antecedents leading up to the target behaviors, she added. It's important for that individual to gather input from a variety of sources, such as parents, staff members, and, if applicable, outside providers, said Reznik.

"Make sure the FBA report is presented in a logical, concise manner that separates data by setting, time of day, activity, and the reporter, just so we have clear data to present," she said. "And of course, ensure that the report is shared with parents in advance of any decision making, so that they can meaningfully participate."

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