

From Identification to Plan: Educating Students with Mental Health Needs

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Agenda

- ◆ Identifying Students with Mental Health Needs
 - ◆ IDEA
 - ◆ Section 504
- ◆ Educating Students with Mental Health Needs
 - ◆ Educational Services & Supports
 - ◆ Extracurricular Supports
 - ◆ Discipline Protections

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Identifying Students with Mental Health Needs



IDEA



Suspecting a Disability under IDEA

- ◆ Districts have an affirmative obligation to timely evaluate any student within their jurisdiction suspected of having a disability under the Individuals with Disabilities Education Act (IDEA). 34 CFR 300.111(a)(1)(i).
- ◆ Regardless of whether a parent (or teacher) makes a referral for special education.
- ◆ Failure to timely evaluate can result in a child find violation.

So, what is a Disability under the IDEA?

- ◆ Eligibility Questions for the IDEA:
 - ◆ Does the student have a disability in an IDEA eligibility category?
 - ◆ Does the student “need special education and related services” to benefit from education?

Disability Categories under the IDEA

- ◆ To qualify for special education and related services under Part B of the IDEA, a student must:
 - ◆ Be between the ages of 3 and 21;
 - ◆ Meet the definition of one or more of the categories of disabilities. which include:
 - ◆ intellectual disability,
 - ◆ a hearing impairment (including deafness),
 - ◆ a speech or language impairment,
 - ◆ a visual impairment (including blindness),
 - ◆ a serious emotional disturbance (referred to in this part as "emotional disturbance"),
 - ◆ an orthopedic impairment,
 - ◆ autism,
 - ◆ traumatic brain injury,
 - ◆ other health impairment,
 - ◆ a specific learning disability,
 - ◆ deaf-blindness, or
 - ◆ multiple disabilities; and
 - ◆ Need special education and related services as a result of his disability or disabilities. 34 CFR 300.8 (a)(1).

Triggering Event for Child Find?

- While a child find analysis is very fact sensitive, the triggering event for child find is always the point in time that district suspects or should have suspected a disability.
- So, what facts support a “suspected disability”?

Case Law: Child Find: Facts

- ◆ *C.B. v. North East Indep. Sch. Dist.*, 80 IDELR 162 (W.D. Tex. Feb. 16, 2022).
 - ◆ 12th grade gifted student, diagnosed with ADHD in 2nd grade, but performed well through her elementary education.
 - ◆ While attending middle school she was diagnosed with GAD, which increased during her 9th grade year (2018-2019). C.B. was medicated with assistance from the school nurse.
 - ◆ During 10th grade (2019-2020), C.B. was placed in an outpatient center due to suicidal ideation and returned to school late September. Her grades began to slip and was then placed in a residential treatment facility due to depression and anxiety in November. C.B. withdrew from school on December 2, 2019.
 - ◆ The district argued it never had reason to suspect C.B. should be evaluated for eligibility for special education services because she was designated as a gifted and talented student and achieved high academic performance throughout the time at issue.
 - ◆ The district further argues that its Child Find obligation to C.B. ceased when she withdrew from school and entered private placement out of state.

Case Law: Child Find: Ruling Rationale

- ◆ *C.B. v. North East Indep. Sch. Dist.*, 80 IDELR 162 (W.D. Tex. Feb. 16, 2022).
 - ◆ The District Court held the district failed to see signs of disability due to C.B.'s history of success.
 - ◆ The district had reason to suspect C.B. may have a disability and should be evaluated for sped services by December 2019.
 - ◆ The Court explained that while the district had knowledge of C.B.'s ADHD and anxiety prior to December 2019, the holistic view and culmination of information did not present reason to suspect a need for evaluation until such time.
 - ◆ However, in December 2019, the district's knowledge of C.B.'s ADHD, increasing anxiety and depression which required outpatient treatment for an extended time, and her eventual withdrawal from school to attend a full-time treatment facility presented sufficient reason to suspect C.B. may have a disability and should be evaluated.

Case Law: Child Find: Facts

💧 *Malloy v. District of Columbia*, 80 IDELR 242 (D.D.C. Mar. 30, 2022).

- 💧 Student had significant absences
 - 💧 10th Grade- Between 43-64 unexcused absences (depending on the class period)
 - 💧 Resulted in a truancy referral to court
 - 💧 11th Grade- 99 absences
- 💧 Student had poor grades
 - 💧 9th Grade- 5 C's, 2 B's, 3- D's, and 1 F
 - 💧 10th Grade- Failed 7 of 9 classes
- 💧 Student had poor state test scores
 - 💧 8th Grade- 1 out of 5 on ELA and Math assessments
 - 💧 9th Grade- 1 out of 5 on the ELA, Math, and Algebra assessments
- 💧 Teachers expressed concerns:
 - 💧 Performing poorly academically and not improving over time
 - 💧 Disinterested in class, lacked focus and ability to complete work successfully
 - 💧 Refused to work, would get up and walk around class, banged on classroom door and cursed after late to class

Case Law: Child Find: Ruling Rationale

- 💧 *Malloy v. District of Columbia*, 80 IDELR 242 (D.D.C. Mar. 30, 2022).
 - 💧 Reversed Hearing Officer's ruling that factually, truancy was the only possible indication of a suspected disability.
 - 💧 Held that the parent met her burden in "showing that school officials overlooked clear signs of a disability and were negligent in failing to order testing. (6th Cir. standard for evaluating child find claims)
 - 💧 HO ignored substantial evidence of a suspected learning or behavioral disability in the form of poor test scores, grades, teacher comments, classroom behavior, and attendance.

Case Law: Child Find: Facts

- ◆ *JZ v. Cataline Foothills Sch. Dist.*, 83 IDELR 62 (D.AZ., May 4, 2023).
 - ◆ In 9th grade, the 504 team conducted an annual review and determined JZ, a student with ADHD, was not achieving to his ability and was not using the accommodations listed in his 504 plan.
 - ◆ As a result, the team determined the plan should stay in place to provide JZ a chance at achieving academic success.
 - ◆ The summer after 9th grade, JZ was hospitalized twice for depression, homicidal ideation, and suicidal ideation.
 - ◆ Diagnosed with ADHD, Bipolar, and Cannabis Use Disorder.
 - ◆ Parents requested a sped evaluation at the start of 10th grade year due to his hospitalization for depression and suicidal ideation.
 - ◆ Parents informed school psych of diagnoses of ADHD, ODD, and MDD, and hospitalization for suicidal ideation and substance abuse problems.
 - ◆ The district denied Parents request for special education eval.

Case Law: Child Find: Ruling Rationale

- ◆ *JZ v. Cataline Foothills Sch. Dist.*, 83 IDELR 62 (D.AZ., May 4, 2023).
 - ◆ The Court held that “the district should have evaluated JZ not merely because Parents asked for an evaluation, but because the parents’ request, communication, and documentation put the district on notice that JZ had received diagnoses for new suspected disabilities beyond his ADHD.”
 - ◆ The Court explained that while a district does not have to evaluate every student whose parent requests an IEP; a district must evaluate a student for a suspected disability when it has notice that the student is displaying signs or symptoms of a particular disability.

Section 504



Child Find: Section 504

- ◆ Districts must “undertake to identify and locate every qualified handicapped person residing in the recipient’s jurisdiction who is not receiving a public education.” 34 CFR 104.32(a).
- ◆ Section 504’s child find requirement applies to individuals with a disability living in a district regardless of whether the student has an official residence or is homeless (district of residence responsible).

Section 504 v. the IDEA

- ◆ Eligibility Questions for Section 504:
 - ◆ Does the student have a physical or mental impairment?
 - ◆ Does the impairment substantially limit a major life activity?

Major Life Activities

- ◆ Including (but not limited to):
 - ◆ Caring for oneself, performing manual tasks, seeing, hearing, eating, sleeping, walking, standing, lifting, bending, speaking, breathing, learning, reading, concentrating, thinking, communicating, and working
OR
 - ◆ Operation of a major bodily function, including (but not limited to)
 - ◆ Functions of the immune system, normal cell growth, digestive, bowel, bladder, neurological, brain, respiratory, circulatory, endocrine, reproductive functions, and operation of individual organ.

28 CFR 35.108 (c)(1)(i).

Mitigating Measures

- ◆ The Act explicitly removes the requirement that the impact of mitigating measures be considered when determining whether a person has a disability under the Act. 28 CFR 35.108(d)(1)(viii).
- ◆ However, regular eyeglasses and contact lenses are not considered mitigating measures. Dear Colleague Letter, 58 IDELR 79 (OCR 2012).

Broad Coverage

- ◆ Congress has specifically stated that eligibility should be viewed with “broad coverage”!!!
- ◆ So, whether or not an impairment **significantly limits** a major life activity should not be a sticking point for eligibility.

Technically Eligible Students

- ◆ Under Section 504, unlike the IDEA, a student may have a qualifying disability and be technically eligible but not need a 504 plan. On the other hand, a student may have a qualifying disability and also need special education or related services. Students in the first category are protected by Section 504's anti-discrimination provisions. Students in the second category are covered by those protections but are also entitled to a 504 plan. *Dear Colleague Letter*, 58 IDELR 79 (OCR 2012)

Suspecting a Disability under Section 504

- ◆ Because a district has an affirmative child find duty, a district's own suspicions may trigger an obligation to evaluate, even if the student's parent does not request an evaluation.
 - ◆ This might include documentation of a medical disability, an outside evaluation suggesting a disability, excessive medical or mental health absences, discipline record, poor classroom performance, etc.
- ◆ When a student is ineligible for IDEA services, the district may need to consider whether there is an impairment that substantially limits a major life activity.
 - ◆ However, the courts are split on whether a parent's revocation of IDEA services is also a rejection of Section 504 services.

Case Law: Child Find

- ◆ *E.P. v. Twin Valley Sch. Dist.*, 78 IDELR 69 (E.D. Pa. 2021).
 - ◆ E.P. was already receiving special education services pursuant to an IEP for Gifted.
 - ◆ Kindergarten year, Parent informed his teacher of his sensory processing disorder and asked for specific assistance with his eating disorder as a method for managing behaviors at home.
 - ◆ The district and Parent agreed to reevaluate E.P.'s eligibility for services.
 - ◆ The district concluded that he did not meet the requirements for special education under the IDEA but did qualify for a Gifted IEP.
 - ◆ The district did not offer, and Parent did not ask for, an assessment to determine if he was eligible for Section 504 FAPE supports.
 - ◆ Parents continued to inform the district about E.P.'s struggle with self-regulating, learning, and his behavior issues.
 - ◆ The Court found that the district violated its child find obligations under Section 504 when it relied on an IDEA evaluation to determine E.P.'s entitlement to accommodations because the district had reason to suspect he needed accommodation for his emotional regulation and sensory issues.

Requiring Medical Documentation for Impairment

- ◆ *South Monterey County Joint Union High Sch. Dist.*, 112 LRP 28705 (OCR 2012).
 - ◆ OCR concluded that a district denied a student FAPE when it delayed an evaluation due to the parent's failure to provide a medical diagnosis.
 - ◆ When the parent referred her son for a 504 plan due to academic struggles related to his ADHD, the district required the parent to provide medical documentation for identification under Section 504.
 - ◆ This resulted in an evaluation being delayed almost a year and half until the parent provided an outdated (6 years old) medical statement.
 - ◆ The district implemented a Section 504 plan without completing a current evaluation to determine the impact of the disability on learning.
 - ◆ Because the medical evaluation was outdated, OCR concluded "the plan based on that evaluation was inadequate."

Educating Students with Mental Health Needs



Educational Services & Supports



FAPE under IDEA

- ◆ What is a free appropriate public education (FAPE)?
 - ◆ *Rowley Standard*: For a student who is fully integrated into the regular education setting, the student's IEP should be “reasonably calculated to enable the child to achieve passing marks and advance from grade to grade.” *Board of Educ. of the Hendrick Hudson Central Sch. Dist. v. Rowley*, 553 IDELR 656 (U.S. 1982).
 - ◆ *Andrew F. Standard*: For a student who is not fully integrated into the regular education setting, the student's IEP should be “appropriately ambitious” and give the student a “chance to meet challenging objectives” – goals must be “appropriately ambitious in light of [the child's] circumstances.” *Andrew F. v. Douglas County Sch. Dist. RE-1*, 69 IDELR 174 (U.S. 2017).

FAPE under Section 504

- ◆ Section 504 defines “appropriate education” to mean
 - ◆ the provision of general or special education and related aids and services that are designed to meet the individual needs of students with disabilities as adequately as the needs of nondisabled students are met. 34 CFR 104.33 (b)(1)(i).

The FAPE Standard: IDEA vs. Section 504

- ◆ The primary difference between the standards of FAPE under the IDEA and Section 504 is the type of educational benefit required.
- ◆ The IDEA focuses on students' progress in relation to their own potential.
- ◆ Section 504 requires courts to consider whether students with disabilities are receiving educational services as effective as those made available to their nondisabled peers.

Related Services Under IDEA

- ◆ Related Services means transportation and such developmental, corrective, and other supportive services as are required to assist a child with a disability to benefit from special education.

Amount of Related Services

- ◆ The IEP team must include the projected start date, anticipated frequency, location, and duration of the related services.

34 CFR 300.20(a)(7).

- ◆ The IEP must specify the amount and type of related services needed to meet the child's needs.

Letter to Rowland, 75 IDELR 108 (OSEP 2019).

Related Services

- ◆ Related Services include:
 - ◆ Speech-language pathology and audiology services
 - ◆ Interpreting services
 - ◆ Psychological services
 - ◆ Physical and occupational therapy
 - ◆ Recreation, including therapeutic recreation
 - ◆ Early identification and assessment of disabilities in children
 - ◆ Counseling services, including rehabilitation counseling
 - ◆ Orientation and mobility services
 - ◆ Medical services for diagnostic or evaluation purposes
 - ◆ School health and school nurse services
 - ◆ Social work services in schools
 - ◆ Parent counseling and training

Defining Related Services under Section 504

- ◆ Unlike the IDEA, Section 504 regulations do not list specific types of related services.
- ◆ Letters of Findings issued by the Office for Civil Rights demonstrate that the legal principles regarding the identification of specific related services are substantially similar under both laws. See, e.g., *Spokane (MO) R-VII Sch. Dist.*, 58 IDELR 201 (OCR 2011); *Pasadena (CA) Unified Sch. Dist.*, 80 IDELR 139 (OCR 2021); *Beaufort County (SC) Sch. Dist.*, 121 LRP 34036 (OCR 06/07/21); and *Puerto Rico (PR) Dep't of Educ.*, 77 IDELR 264 (OCR 2020).

Counseling Services

- 🔹 Counseling Services-

- 🔹 Section 504—Must be provided if required for the school district to meet that student's individual educational needs as adequately as it meets the needs of nondisabled students. 34 C.F.R. § 104.33(b).
- 🔹 IDEA—Must be provided if require to assist the student in benefiting from special education.
- 🔹 Must be determined necessary by the IEP or 504 Team, not just because private provider recommends.

Selecting Appropriate Accommodations

- ◆ Accommodations should:
 - ◆ Enable students to participate more fully in instruction and assessments and better demonstrate their knowledge and skills.
 - ◆ Be based upon individual student need and not upon the category of disability, level of instruction, or program setting.
 - ◆ Be provided on a regular basis during instruction.
 - ◆ Foster and facilitate independence for students, not dependence.
 - ◆ Provide access – not advantage.

Behavior Intervention Plans

- ◆ Circuit Courts have also held that a district may have a duty under Section 504, similar to IDEA, to develop a BIP if it is necessary to address the behaviors of a student with a disability.
 - ◆ *Morgan v. Chris L.*, 25 IDELR 227 (6th Cir. 1997, unpublished) (finding that despite the student's long history of behavioral difficulties and failing grades, the district failed to create a plan of intervention to address them);
 - ◆ *A.G. v. Paradise Valley Unified Sch. Dist. No. 69*, 67 IDELR 79 (9th Cir. 2016) (noting the because a seventh-grader with autism could have remained in her middle school's gifted program had the district developed a BIP, the parent's Section 504 and Title II claims against the district could proceed).

Impact of Mental Health Issues on BIP Development

- ◆ While most behavior specialists would not consider mental health issues (such as anxiety) as a “function” of behavior, most will acknowledge that emotional stability can contribute to/be a factor related to behavior.
- ◆ Mental health struggles (increased anxiety, periods of emotional instability) can be an environmental factor or antecedent to behavioral challenges.
- ◆ Social skills/emotional deficits (skill deficits) may exist and require intervention to decrease behavioral incidents.

Impact of Mental Health Issues on BIP Development

- ◆ When developing the BIP, mental health professionals can assist in recommending/providing interventions and strategies to assist a student with mental health issues that may contribute to the behavior identified in the FBA.
- ◆ Counseling related services/special education interventions to teach strategies to use preventatively (antecedent strategies) to reduce mental health struggles (anxiety, frustration, anger, etc.) and to use once a behavioral issue (and associated emotions) occurs (consequence), such as calming/coping strategies.
- ◆ Social skills groups to teach appropriate social skills.

Case Law: Facts

Lee v. Board of Educ. for Prince George's County, 124 LRP 3463 (D. Md. 01/31/24).

- ◆ A parent of a 6th grader with SLD requested an IEE.
- ◆ IEE concluded the student met the diagnostic criteria for generalized anxiety disorder.
 - ◆ Student had a history of frequent absences from school since pre-K.
 - ◆ C.L. accrued 36 absences in 5th grade, 29 in 6th and 45 in 7th grade.
- ◆ The student showed no signs of anxiety or behavior while at school, and the district had implemented the student's IEPs and student had made progress (as shown by progress reports).
- ◆ The district addressed the anxiety concerns through the IEP by instructing teachers to use a “gentle” tone and offer breaks if needed.
- ◆ Parent alleges the absences were related to anxiety and the district failed to provide supports related to the anxiety or conduct an FBA.

Case Law: Ruling Rationale

Lee v. Board of Educ. for Prince George's County, 124 LRP 3463 (D. Md. 01/31/24).

- ◆ The Court upheld an ALJ's finding that the district did not have to address behaviors unrelated to the student's disability due to the lack of connection between the student attendance and anxiety.
 - ◆ A district does not have to address all behaviors that might affect an IDEA-eligible student's attendance, but must determine whether the behaviors affecting the student's attendance were related to his disability.
- ◆ It upheld that the student's IEPs, which included supports for anxiety, were reasonably calculated to provide FAPE.

Case Law: Behavior: Facts

I.S. v. Fulton County Sch. Dist., 124 LRP 37988 (11th Cir. Oct. 31, 2024).

- ◆ I.S. was a high schooler with autism and a history of severe anxiety, social phobia, depression, suicidal thoughts, and self-harm.
 - ◆ I.S. had school refusal issues beginning in middle school, which led to his parents withdrawing him and enrolling him in a private day school for several years.
- ◆ The district entered into a settlement agreement to pay for the private day school (Eaton), but two weeks into the school year, I.S. refused to attend.
- ◆ The district held several IEP meetings with the parents to develop a transition plan for I.S. to get back into school at Eaton, which included I.S. taking online classes, meeting with a behavior analyst at various locations 2 hours per week, and in-home instruction by a certified teacher for 4 hours per week.
- ◆ A couple of months later, the parents gave notice of their intent to enroll I.S. in a residential facility and seek district reimbursement through due process.
 - ◆ The district claimed the parents had not given it enough time to try to reintegrate I.S. back into a school setting and I.S. had progressed (from initially resisting leaving his room and refusing to do any work, to willingly meeting the behavior analyst at coffee shops and libraries to work on assignments).

Case Law: Behavior: Ruling Rationale

I.S. v. Fulton County Sch. Dist., 124 LRP 37988 (11th Cir. Oct. 31, 2024).

- ◆ The Court held that the parents failed to prove a denial of FAPE.
 - ◆ The district repeatedly requested more access to I.S. for behavioral and academic support than the parents were able to provide.
 - ◆ The parents turned down offers for additional in-home teaching assistance and were not interested in enrolling I.S. in additional online courses as recommended by the district.
 - ◆ The parents withdrew I.S. as he was beginning to make significant progress towards the reintegration plan but before the district could fully implement the plan.

Extracurricular Supports



Reasonable Modifications for Extracurricular Activities

- Districts must:
 - Make reasonable modifications as well as provide aids or services that are necessary to ensure a disabled student has the opportunity to participate in extracurricular activities.
- District' are not required to:
 - Provide modifications to the extent that the modifications would fundamentally alter the program.
 - “Fundamental Alteration” may occur when a modification alters such an essential aspect of the activity that it would be unacceptable even if it affected all competitors equally, including when a change provides an unfair advantage to a player with a disability.
 - Negate safety standards or the requirement of a certain skill level.

Case Law: IEP: Facts

J.A. and M.A on behalf of G.A. v. Royal Oak Sch. Dist., 125 LRP 26919
(E.D.Mich. Sept. 4, 2025).

- ◆ Plaintiffs allege that the district's IEP violated the IDEA and denied G.A. FAPE and equal access by failing to state that G.A. was allowed to participate in specific extracurricular activities.
- ◆ G.A., a 13-year-old with numerous diagnoses including Fetal Alcohol Spectrum Disorder, ADHD, and Reactive Attachment Disorder, struggled with emotional regulation particularly in the afternoons, including elopement from classrooms, physical aggression, and yelling curse words.
- ◆ Despite the IEP being silent on the issue, the district provided a 1:1 paraprofessional to support G.A. when he chose to attend a weightlifting club.
- ◆ G.A. was allowed to attend soccer club until he became too physically aggressive towards other students and was told he could no longer attend.
- ◆ G.A. was told he was not allowed to attend a school dance because the school did not have support available for him to attend.

Case Law: IEP: Ruling Rationale

J.A. and M.A on behalf of G.A. v. Royal Oak Sch. Dist., 125 LRP 26919
(E.D.Mich. Sept. 4, 2025).

- ◆ The Court found in favor of the district.
 - ◆ While the IEP should have included a statement about G.A.'s participation in extracurricular activities pursuant to the IDEA, failure to do so was merely a technical error that did not result in substantive harm.
 - ◆ G.A. was provided support to allow him to participate in weightlifting club.
 - ◆ Based on the limited evidence submitted by the parents, the Court deferred to the judgement of school officials that G.A.'s behavior became unsafe during soccer club, justifying removal.
 - ◆ While “simply announcing that no support was available” for the school dance is not equal access, the Court concluded that failing to provide access to one event (which G.A. was arguably unable to safely attend) clearly did not deny FAPE or show that the IEP, taken in its entirety, did not provide educational

Discipline Protections



Disciplinary Protections under IDEA & Section 504

- ◆ The discipline protections for Section 504 are almost identical to IDEA.
 - ◆ Although Section 504 does not mention the words “manifestation determination,” OCR has interpreted Section 504 to require an MDR for disciplinary actions resulting in a significant change of placement.
 - ◆ If the conduct was a manifestation of the student’s disability, the student generally cannot be expelled or suspended for the conduct beyond the “10th day.”
 - ◆ Section 504 prohibits districts from disciplining students with disabilities more harshly than nondisabled students.
 - ◆ Although no “interim alternative educational setting language” appears in Section 504, OCR has stated that districts may remove a qualifying student to an IAES for up to 45 days due to weapon’s offense involving a gun.
 - ◆ It is unclear with other weapons, drugs, and dangerous behavior.
- ◆ However, there is no specific requirement to provide educational services (FAPE) when there is no manifestation and the student is expelled or suspended beyond 10 days—but provide what would be provided to similar nondisabled students.

Manifestation Determination

- ◆ A manifestation determination is the evaluation of the relationship between the student's conduct in question and the student's disability.
 - (1) Was the conduct caused by or did it have a direct and substantial relationship to the child's disability?
 - (2) Was the conduct the direct result of the district's failure to implement the IEP/Section 504 plan?

Making the Manifestation Determination

- ◆ If either (1) or (2) is applicable, the conduct is a manifestation of the student's disability:
 - (1) Was the conduct caused by or did it have a direct and substantial relationship to the child's disability?
 - (2) Was the conduct the direct result of the district's failure to implement the IEP/Section 504 plan?

Manifestation Determination Review

- ◆ Must consider information from a variety of sources.
- ◆ Team Members:
 - ◆ IDEA—The LEA, the parent, and the relevant team members as determined by the parent and the district.
 - ◆ Section 504—Should include persons knowledgeable about the child's disability and needs, the evaluation data, and placement options.
- ◆ If the conduct is not a manifestation, the district may discipline the student as it would discipline a non-disabled student.

Thank You!

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