



Office of the State Superintendent of Education

DISTRICT OF COLUMBIA
MAYOR ADRIAN M. FENTY

DECEMBER 7, 2010

() ACTION REQUIRED
(X) INFORMATIONAL

TO: Chancellor, District of Columbia Public Schools (DCPS)
Public Charter School Board
Public Charter School Directors

FROM: Tamera J. Lewis 
Assistant Superintendent, Division of Special Education

RE: Significant Cognitive Disability Guidance

Cc: Beth H. Colleye, Interim Superintendent

The Office of the State Superintendent of Education's (OSSE's) Division of Special Education issues this guidance to ensure that all District of Columbia Local Education Agencies (LEAs) are provided with guidance related to the definition of significant cognitive disabilities, to assist teams in decision making that will ensure compliance under Part B of the Individuals with Disabilities Education Act of 2004 (IDEA). This guidance document, which incorporates a review of both professional literature and other State guidance, has been prepared in an effort to provide IEP teams with additional information by which to guide their decision making related to answering the following question, "Does this student have a significant cognitive disability?"

The term "significant cognitive disability" is not a new separate category of disability. It is a designation given to a *small number* of students with disabilities for purposes of their participation in the DC CAS Alternate Assessment (DC CAS-Alt). IEP teams may consider the information below to help guide the discussion of whether or not a student has a significant cognitive disability.

The level of cognitive ability and adaptive behavior skills for some students classified with a disability may prevent attainment of the academic content and achievement standards that are designated at each grade level for all students. When the IEP team meets to discuss the assessment decisions for a student to participate in the DC CAS –Alt, multiple sources of information, including psychological assessments, observations, achievement test data, and curricular content for evidence of a significant cognitive disability must be reviewed and discussed to determine eligibility. An Intelligence Quotient (IQ) score alone is considered to be insufficient documentation to establish eligibility. IEP teams should also consider all information available pertaining to the cognitive abilities of the student, including ability tests. The focal point for discussion needs to be on the impact of the cognitive disability.

Under guidelines issued by the American Association on Intellectual and Developmental Disabilities (AAIDD)¹ and the American Psychiatric Association (APA)², a child is considered to have a cognitive

¹ http://www.aaidd.org/content_100.cfm?navID=21

² American Psychiatric Association (2000). Diagnostic and Statistical Manual of Mental Disorders: Fourth Edition. Washington, DC



disability based on three criteria. One criterion is intellectual functioning. However, AAIDD and the APA note that the following two other factors should be present before a person is considered to have a cognitive disability:

- 1) Significant limitations in two or more adaptive skills areas, such as daily living skills, communication, self-care, social skills, academic skills, and work skills; and
- 2) A condition which is present from early childhood.

A history of poor performance on state assessments and/or deficient reading scores does not automatically qualify a student as having a significant cognitive disability. The US Department of Education estimates that the incidence rate of students with the most significant cognitive disabilities will be approximately one percent³. When examining incidence data, this group typically includes moderate and severe intellectual disabilities as a primary, secondary, and/or tertiary disability; as well as classifications of multiple disabilities, autism, and deaf-blindness, where intellectual disabilities are moderate and/or severe. The following additional information represents what is traditionally found in the literature regarding the characteristics of children who have significant cognitive disabilities:

- The student's demonstrated *cognitive functioning and adaptive behavior* in the home, school, and community environments are significantly below age expectations, even with program modifications, adaptations and accommodations.
- The student's course of study is *primarily* functional and life-skills oriented.
- The student *requires extensive direct instruction and/or extensive supports* in *multiple settings* to acquire, maintain, and generalize academic and functional skills necessary for application in school, work, home, and community environments.
- The student *demonstrates severe and complex disabilities and poor adaptive skills levels* (determined to be significantly below age expectations by that student's comprehensive assessment) that essentially prevent the student from meaningful participation in the standard academic core curriculum or achievement of the academic content standards established at grade level.
- The student's *disability causes dependence on others for many, if not all*, daily living needs, and the student is expected to require extensive ongoing support in adulthood.

For more information on assessment considerations related to significant cognitive disabilities, see:

³ US Department of Education. (August, 2005). *No Child Left Behind Alternate Achievement Standards for Students with the Most Significant Cognitive Disabilities: Non-Regulatory Guidance*. Retrieved December 2, 2010, from www2.ed.gov/policy/elsec/guid/altguidance.pdf



US Department of Education. (August, 2005). *No Child Left Behind Alternate Achievement Standards for Students with the Most Significant Cognitive Disabilities: Non-Regulatory Guidance*. Retrieved December 2, 2010, from www2.ed.gov/policy/elsec/guid/altguidance.pdf

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Snell, M.E., & Brown, F. (2000). Development and implementation of education programs. In M.E. Snell, & Brown (Eds.), *Instruction of students with severe disabilities* (5th ed., pp. 115-172). Upper Saddle River, NJ: Merrill Prentice-Hall.